

1 BROWN RUDNICK LLP  
 Joel S. Miliband, #77438  
 2 jmiliband@brownrudnick.com  
 4 Park Plaza, Suite 420  
 3 Irvine, California 92614  
 Telephone: (949) 752-7100  
 4 Facsimile: (949) 252-1514

5 Michael R. Graif  
 Seven Times Square, 46<sup>th</sup> Floor  
 6 New York, NY 10026  
 Tel.: 212-209-4800  
 7 mgraif@brownrudnick.com

8 Daniel A. Rozansky, #161647  
 drozansky@brownrudnick.com  
 9 2121 Avenue of the Stars, Suite 720  
 Los Angeles, California 90067  
 10 Telephone: (424) 525-0200  
 Facsimile: (424) 525-0201

11 Katherine C. Dearing (*pro hac vice*)  
 12 1900 N Street, Fourth Floor  
 Washington, D.C. 20036  
 13 Tel.: 202-536-1700  
 kdearing@brownrudnick.com

14 Attorneys for Plaintiff and Counterclaim-Defendants  
 15 Rapid Relief Team (RRT) Ltd., and Counterclaim-Defendants  
 Brown Rudnick LLP, Katy-Jade Church, and Michael Graif

16 **UNITED STATES DISTRICT COURT**  
 17  
 18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
 19 **OAKLAND DIVISION**

19 RAPID RELIEF TEAM (RRT) LTD.,  
 20 Plaintiff and Counterclaim-  
 21 Defendant,  
 22 vs.  
 23 CHERYL BAWTINHEIMER,  
 24 Defendant and  
 Counterclaim-Plaintiff.  
 25 vs.  
 26 BROWN RUDNICK LLP, KATY-JADE  
 27 CHURCH, and MICHAEL GRAIF,  
 28 Counterclaim-Defendants.



Case No. 4:25-cv-10864-JST  
 HON. JON S. TIGAR  
**NOTICE TO THE COURT  
 REGARDING FACTUAL  
 STATEMENTS MADE IN JUNE  
 18, 2026 HEARING**  
 Action Filed: December 19, 2025  
 Amended Complaint Filed: January  
 30, 2026

1                    **NOTICE TO THE COURT REGARDING FACTUAL STATEMENTS**  
2                    **FROM JUNE 18, 2026 HEARING**

3                    Plaintiff and Counterclaim-Defendant Rapid Relief Team (RRT) Ltd. and  
4 Counterclaim-Defendants Brown Rudnick LLP, Michael Graif, and Katy-Jade Church  
5 write this letter to provide a factual correction to the record concerning a statement  
6 made during the recent June 18, 2026 hearing.

7                    During the course of the discussion regarding Defendant and Counterclaim-  
8 Plaintiff Cheryl Bawtinheimer’s (“Defendant”) Motion for a Preliminary Injunction,  
9 undersigned counsel noted that, putting all other points aside, the requisite irreparable  
10 harm was lacking because it was within Defendant’s ability to repost edited versions  
11 of the videos in question without the allegedly infringing content, i.e., the Cookie Bird  
12 Logo (the “Logo”). Counsel for Defendant responded that this was incorrect, and that  
13 editing each video to delete the Logo would necessarily mean that the entire portions  
14 of the videos where the Logo was shown would be deleted, thus resulting also in the  
15 deletion of all the audio and video during these portions of the video.

16                    This is factually incorrect. As YouTube explains, a YouTube user can easily  
17 blur images or specific parts of videos directly on YouTube, even after a video has  
18 been uploaded.<sup>1</sup> Indeed, the process is very simple:

- 19                    1. Sign in to [YouTube Studio](#).  
20                    2. From the left menu, select **Content** .  
21                    3. Click the title or thumbnail of the video you’d like to edit.  
22                    4. From the left menu, select **Editor** .  
23                    5. Under the “Video editor” section, select **Blur** > select **Custom blur**.  
24                    6. Click and drag the box to adjust the blur.  
25

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27                    <sup>1</sup>[https://support.google.com/youtube/answer/9057652?hl=en&ref\\_topic=9257785](https://support.google.com/youtube/answer/9057652?hl=en&ref_topic=9257785&sjid=4916318937459730362-EU)  
28                    [&sjid=4916318937459730362-EU](https://support.google.com/youtube/answer/9057652?hl=en&ref_topic=9257785&sjid=4916318937459730362-EU).

1 7. Click **SAVE**.

2 Furthermore, Plaintiff has confirmed that this blurring action may be taken  
3 without affecting the existing URL of the video or its existing comments. Accordingly,  
4 Plaintiff reiterates its statement that Defendant can easily make the requested edits to  
5 the videos in question without losing the associated audio and video, the URL, or the  
6 comments, and therefore Defendant has not suffered the requisite irreparable harm to  
7 justify any injunction.

8 For the avoidance of doubt, Plaintiff also reiterates its open offer that Defendant  
9 can re-post the subject videos at any time if Defendant will blur (or otherwise delete)  
10 the Logo in these videos<sup>2</sup>, pending the Court’s final determination, at summary  
11 judgment or trial, whether Defendant’s use of the Logo constitutes fair use.

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25 <sup>2</sup> There is also a “Trim” feature on YouTube that allows for modification by  
26 removing a particular section or sections of an existing video without affecting the  
27 existing URL or comments.

28 [https://support.google.com/youtube/answer/9057455?hl=en&ref\\_topic=9257785&sjid=15079805500647603098-NA](https://support.google.com/youtube/answer/9057455?hl=en&ref_topic=9257785&sjid=15079805500647603098-NA).

1 DATED: June 24, 2026

Respectfully submitted,

2 BROWN RUDNICK LLP

3  
4 By: /s/ Daniel A. Rozansky

5 Joel S. Miliband  
6 4 Park Plaza, Suite 420  
7 Irvine, California 92614  
8 Telephone: (949) 752-7100  
9 Facsimile: (949) 252-1514  
10 jmiliband@brownrudnick.com

11 Michael R. Graif  
12 Seven Times Square  
13 New York, NY 10026  
14 Tel.: 212-209-4800  
15 mgraif@brownrudnick.com

16 Daniel A. Rozansky  
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20 Facsimile: (424) 525-0201  
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23 1900 N Street, Fourth Floor  
24 Washington, D.C. 20036  
25 Tel.: 202-536-1700  
26 kdearing@brownrudnick.com

27 *Attorneys for Plaintiff and Counterclaim-*  
28 *Defendants Rapid Relief Team (RRT) Ltd.,*  
*and Counterclaim-Defendants*  
*Brown Rudnick LLP, Katy-Jade Church,*  
*and Michael Graif*