UNITED STATES COPYRIGHT CLAIMS BOARD

Ben Camacho Enterprises LLC,
Claimant,
v.
Eleven Public Affairs,
Respondent.

Docket No. 25-CCB-0108

CLAIMANT'S REPLY EVIDENCE LIST

Pursuant to 37 C.F.R. § 222.15(c)(1), Claimant submits the following documentary evidence with its reply testimony. This evidence is limited to contradicting and rebutting specific evidence presented in Respondent's response testimony—specifically, Respondent's certification that its Evidence B (Storyblocks invoice) documents "Eleven Public Affairs's active commercial subscription" (Resp. Evidence List, Doc. 68) and the related sworn statements in the Witness Statement of Carlos Madriles (Doc. 66, ¶ 7). None of these documents was previously presented as part of Claimant's direct testimony. Both respond to Respondent's certification and sworn characterization of its subscription invoices—first made in Respondent's response testimony filed June 16, 2026, after the close of discovery—and the need to rebut that characterization did not arise until it was made. Claimant has filed a Request to Use Evidence Not Previously Submitted regarding these two exhibits, and submits them subject to the Board's ruling on that request.

Reply Ex. 1 — Screen Capture: linktr.ee/carlosmadriles (captured July 3, 2026)
Carlos Madriles's public Linktree page, in which Mr. Madriles identifies himself as a "Serial Entrepreneur" and lists Eleven Public Affairs, Inc. and Dymond Media as separate businesses he operates. Rebuts Respondent's certification that the Storyblocks invoice documents Eleven Public Affairs's subscription: the email address on that invoice, carlos@dymondmedia.com, belongs to a different Madriles company, not to the Respondent entity.

Reply Ex. 2 — Screen Capture: dymondmedia.com (captured July 3, 2026)
Homepage of Dymond Media, an audio-visual and video production company operated by Mr. Madriles. Rebuts the same certification, and shows that Dymond Media's business is video

production—consistent with the subscription Respondent itself describes as "for licensing video footage" (Resp. Evidence List, Doc. 68) serving Dymond Media rather than Respondent.

Reply Ex. 3 — Email from Carlos Madriles to Ben Camacho (July 4, 2026)
Written statement by Respondent's principal, sent in response to Claimant's request for consent to use the above evidence, stating: "The invoice is billed to Carlos Madriles, not to Dymond Media. 'Dymond Media' appears only in my email address. I own both Eleven Public Affairs and Dymond Media." Confirms, in Mr. Madriles's own words, that the Storyblocks invoice is billed to him personally and that Dymond Media is a separate company he owns—the facts Respondent's certification of Evidence B contradicts.

Certification
I certify that the documents identified above are genuine and unaltered to the best of my knowledge.

_____
Ben Camacho
Owner, Ben Camacho Enterprises LLC
Claimant
Date: July 4, 2026