UNITED STATES COPYRIGHT CLAIMS BOARD

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

Docket No. 25-CCB-0108

CLAIMANT'S REQUEST TO USE EVIDENCE NOT PREVIOUSLY SUBMITTED

Claimant Ben Camacho Enterprises LLC respectfully requests permission to use two pieces of documentary evidence not previously provided to the parties, as part of its reply testimony under 37 C.F.R. § 222.15(c)(1).

The evidence is: (1) a screen capture of the public Linktree page of Carlos Madriles (linktr.ee/carlosmadriles), Respondent's principal, which lists Eleven Public Affairs, Inc. and Dymond Media as separate businesses he operates; and (2) a screen capture of the public homepage of dymondmedia.com, the website of Dymond Media, an audio-visual and video production company operated by Mr. Madriles.

Good cause exists. In its response testimony filed June 16, 2026—after the close of discovery—Respondent offered three subscription invoices as evidence and certified each as documenting "Eleven Public Affairs's active commercial subscription" (Resp. Evidence List, Doc. 68; Evidence A–C, Docs. 65, 67, 69), and its principal swore that "Eleven maintains active subscriptions" to the three services (Witness Statement of Carlos Madriles, Doc. 66, ¶ 7). The Storyblocks invoice (Doc. 65) is addressed to an email account at dymondmedia.com. That address sits beneath an ineffective redaction on Doc. 65: the black box does not remove the underlying text, and anyone who selects, copies, and pastes the document's contents into another file can read it. The two proposed exhibits show that dymondmedia.com is the domain of a separate company operated by Mr. Madriles rather than the Respondent entity, and they directly contradict Respondent's certification and sworn characterization of what its invoices document. Whatever the date on which the underlying invoices were exchanged, Respondent's certification and sworn characterization of them as Eleven Public Affairs's business records were first made

on June 16, 2026, after the close of discovery. The need to rebut that characterization did not exist until it was made, so Claimant could not have provided this rebuttal evidence earlier in the proceeding. The proposed exhibits are publicly available pages published by Respondent's own principal; there is no surprise or prejudice to Respondent.

Claimant requested Respondent's consent to the use of this evidence by email on July 4, 2026, and disclosed both proposed exhibits by link. Respondent declined the same day. In declining, Respondent's principal stated in writing: "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." Claimant accordingly requests permission to use that email as a third piece of reply evidence: (3) the July 4, 2026 email exchange between the parties. Mr. Madriles's written statement confirms in his own words the facts the first two exhibits establish—that the Storyblocks invoice is billed to him personally and that Dymond Media is a separate company he owns alongside Eleven Public Affairs—and the same good cause applies: the statement did not exist until July 4, 2026.

Claimant's reply testimony is due July 7, 2026. Claimant will file the exhibits with its reply testimony, subject to the Board's ruling on this request.

Certification

I certify that the statements above are accurate and truthful to the best of my knowledge.



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