

District Judge Robert S. Lasnik

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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Petitioner,

v.

CORVUS EYE PRODUCTIONS LLC,

Respondent.

NO. C18-00644-RSL

~~PROPOSED~~ ORDER

THIS MATTER comes before the Court on Petitioner United States of America's Motion for Judgment by Default against Respondent Corvus Eye Production, LLC (hereinafter "Respondent").

The Court, having reviewed the pleadings and materials in this case, it is hereby

**ORDERED** that:

Petitioner's Motion for Judgment by Default is **GRANTED**; and

Respondent is **ORDERED** to produce all "documents" or "records" in its custody or control that are responsive to the Federal Aviation Administration administrative subpoena attached hereto as Appendix A, to CHARLES RALEY, c/o Lisa Melanson, FAA Enforcement Division, Western Team, 1200 District Avenue, Burlington, MA 01803, within 30 days of the date of this Order.

1  
2 DATED this 9<sup>th</sup> day of August, 2018.

3  
4 RS Lasnik

5 Robert S. Lasnik  
6 United States District Judge

7 Presented by:

8 /s/ David East

9 DAVID R. EAST WSBA #31481

10 Assistant United States Attorney

11 United States Attorney's Office

12 700 Stewart Street, Suite 5220

13 Seattle, Washington 98101

14 Phone: (206) 553-7970

15 Fax: (206) 553-4073

16 Email: [david.east@usdoj.gov](mailto:david.east@usdoj.gov)

# **APPENDIX A**



U.S. Department  
of Transportation  
Federal Aviation  
Administration

Office of the Chief Counsel

Enforcement Division  
Western Team  
1200 District Avenue  
Burlington, MA 01803

**BY FEDERAL EXPRESS and CERTIFIED MAIL. RETURN-RECEIPT  
REQUESTED**

**March 24, 2017**

Jeremiah Kaynor  
Executive Producer & CEO  
Corvus Eye Productions LLC  
7824 East Fir Street  
Port Orchard, WA 98366

**Re: IN THE MATTER OF THE INVESTIGATION RELATING TO UAS  
FLIGHT OPERATIONS BY CORVUS EYE PRODUCTIONS LLC**

Enclosed is a subpoena with regard to the above-referenced matter. No personal appearance is necessary if the requested information is provided prior to the return date of this subpoena. Please mail the requested information to the attention of Charles Raley at the address at the top of this letter. If you have any questions, please contact Mr. Raley at (310) 725-7108 or at [charles.rale@faa.gov](mailto:charles.rale@faa.gov).

Thank you for your cooperation.

Naomi Tsuda  
Assistant Chief Counsel for Enforcement

By:

Charles Raley, Senior Attorney  
Enforcement Division, Western Team  
email: [charles.rale@faa.gov](mailto:charles.rale@faa.gov)  
Telephone: (310) 725-7108 (main)  
(310) 725-6816 (fax)

Enclosures

UNITED STATES OF AMERICA  
DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
OFFICE OF THE CHIEF COUNSEL  
ENFORCEMENT DIVISION

IN THE MATTER OF THE  
INVESTIGATION RELATING TO UAS  
FLIGHT OPERATIONS CONDUCTED BY  
CORVUS EYE PRODUCTIONS LLC

SUBPOENA DUCES TECUM

TO: Jeremiah Kaynor  
Executive Producer & CEO  
Corvus Eye Productions LLC  
7824 East Fir Street  
Port Orchard, WA 98366

At the instance of the Federal Aviation Administration, you are hereby required to produce records or documents required for the subject investigation.

**AUTHORITY**

This subpoena is issued pursuant to the provisions of 14 Code of Federal Regulations (C.F.R.) Section 13.3, and is authorized under the provisions of 49 United States Code (U.S.C.) Sections 46113(a), 46101, 46104, 46313, and is judicially enforceable under 49 U.S.C. Section 46104(b). Moreover, refusal to comply with this subpoena may result in criminal prosecution pursuant to 49 U.S.C. Section 46313.

**DEFINITION OF "DOCUMENTS" AND/OR "RECORD"**

For the purposes of this subpoena, "documents" or "records" means information stored in any form; any written, recorded or graphic matter, however produced or reproduced; and copies and drafts thereof, and may include correspondence; telegrams; electronic mail; memoranda; reports; notes; drafts; minutes; contracts; agreements; books; records; vouchers; invoices; purchase orders; diaries; logs; computer printouts; memory programs; information stored in computer application, in whatever form; backup materials of any kind; card files; press clippings; newspapers or newsletters; sworn or unsworn statements or employees; lists; audits; deposit slips or cancelled checks; monthly or other periodic statements; ledgers; journals; notices; affidavits; court papers; appointment books; minutes or records of conferences or telephone calls; receipts; written reports or opinions of investigators or experts; status reports; drawings; charts; photographs; or recordings within your possession, or subject to your control, of which you have knowledge, or to which you now have, or have had access, or of which any of your agents, attorneys, accountants, or consultants have knowledge.

**RECORDS OR DOCUMENTS TO BE PRODUCED:**

Any and all records or reports in your custody or control related in any manner to UAS operations conducted by Corvus Eye Productions LLC, including but not limited to:

- 1) All unmanned aircraft systems (UAS) operations conducted by Corvus Eye Productions LLC pursuant to FAA Exemption No. 11890.
- 2) All solicitation for business by Corvus Eye Productions LLC for operations to be conducted pursuant to FAA Exemption No. 11890.
- 3) All aerial photography and/or videography obtained through the use or assistance of any UAS operated by Corvus Eye Productions LLC pursuant to FAA Exemption No. 11890.
- 4) All compensation received relating to UAS operations conducted by Corvus Eye Productions LLC pursuant to FAA Exemption No. 11890.
- 5) All contracts and invoices involving the use of any UAS operated by Corvus Eye Productions LLC pursuant to FAA Exemption No. 11890, including all contracts with UAS operators.
- 6) The name and contact information for each UAS operator that Corvus Eye Productions LLC utilized, hired, or contracted with for operations conducted pursuant to FAA Exemption No. 11890.
- 7) Copies of the FAA issued airman certificate for each UAS operator that Corvus Eye Productions LLC utilized, hired, or contracted with for operations conducted pursuant to FAA Exemption No. 11890.
- 8) The brand, model, description, FAA registration number, and other identifying data concerning any UAS that Corvus Eye Productions LLC used for any operation pursuant to FAA Exemption No. 11890.
- 9) All copies of FAA Exemption No. 11890 provided to any person or entity that utilized, hired, contracted with or purchased services relating to Corvus Eye Productions LLC UAS operations.
- 10) All Corvus Eye Productions LLC UAS operations conducted from a moving vehicle.
- 11) All Corvus Eye Productions LLC UAS operations conducted at night.
- 12) All Corvus Eye Productions LLC UAS operations involving UAS weighing 10 pounds or less conducted within 500 feet of non-participating persons.
- 13) All Plan of Activities submitted by Corvus Eye Productions LLC to any FAA Flight Standards District Office.

**DEADLINE FOR RECEIPT BY THE FAA OF RECORD PRODUCTION:**

April 28, 2017.

**PLACE FOR PRODUCTION OF RECORDS:** The specified records must be mailed or hand-delivered or otherwise produced to Charles Raley, C/o Lisa Melanson, FAA Enforcement Division, Western Team, 1200 District Avenue, Burlington, MA 01803.

The undersigned, an officer designated by the Administrator of the Federal Aviation Administration, executed this subpoena in Washington, D.C., this 23rd day of March, 2017.

NAOMI  
CAROL  
TSUDA

Digitally signed by  
NAOMI CAROL TSUDA  
Date: 2017.03.23  
16:31:55 -0400

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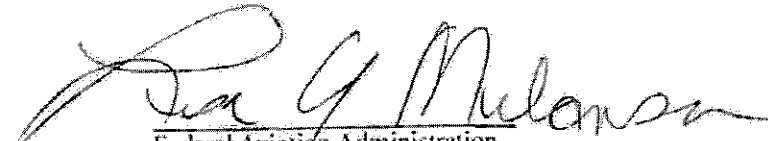
Naomi Tsuda  
Assistant Chief Counsel for Enforcement

CERTIFICATE OF SERVICE

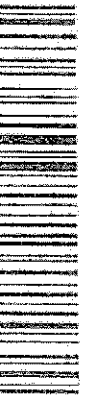
I hereby certify that the foregoing Subpoena has been served to Corvus Eye Productions LLC via Federal Express and Certified Mail, Return-Receipt Requested, on this date, to the following:

Jeremiah Kaynor  
Executive Producer & CEO  
Corvus Eye Productions LLC  
7824 East Fir Street  
Port Orchard, WA 98366

Dated this <sup>4~~1~~</sup>27 day of March, 2017.

  
Federal Aviation Administration





SENDER: COM

7/24/2015

ON DELIVERY

- Complete item
- Print your name and address so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

- Agent
- Addressee
- Recipient by (Printed Name)
- Date of Delivery
- Is delivery address different from item 1?  Yes  No
- If YES, enter delivery address below:

1. Article Addressed to:

Jeremah Kaynor  
 Executive Producer & CEO  
 Corvus Eye Productions  
 7824 East Fir Street  
 Port Orchard, WA 98366

Supen for GR LAN 3/24/17

9590 9402 1319 5285 2085 23

2. \*Article Number (Transfer from service label)

2015 0640 0005 9480 6166

PS Form 3811, July 2015 PSN 7530-02-000-9053

- 3. Service Type
  - Adult Signature
  - Adult Signature Restricted Delivery
  - Certified Mail®
  - Certified Mail Restricted Delivery
  - Collect on Delivery
  - Collect on Delivery Restricted Delivery
  - Insured Mail
  - Insured Mail Restricted Delivery
  - Priority Mail Express®
  - Registered Mail™
  - Registered Mail Restricted Delivery
  - Return Receipt for Merchandise
  - Signature Confirmation™
  - Signature Confirmation Restricted Delivery

Domestic Return Receipt

*fed ex No. 8109 9824 8740*