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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16
17 DISNEY ENTERPRISES, INC., et al.,

18 Plaintiffs,

19 v.

20 MIDJOURNEY, INC., a Delaware
corporation,

21 Defendants.
22

Case No. 2:25-cv-05275-JAK-AJR

**DEFENDANT’S FEDERAL
RULE OF CIVIL PROCEDURE
7.1 DISCLOSURE
STATEMENT AND LOCAL
RULE 7.1-1 CERTIFICATION
AND NOTICE OF
INTERESTED PARTIES**

1 Pursuant to Federal Rule of Civil Procedure 7.1, Defendant Midjourney, Inc.
2 (“Midjourney”) by and through its undersigned counsel, hereby states that it does not
3 have a parent corporation and further states that no publicly held corporation owns
4 10% or more of its stock.

5 Further, pursuant to Local Rule 7.1-1 of the United States District Court for
6 the Central District of California, the undersigned certifies that the following listed
7 persons, associations of persons, firms, partnerships, corporations (including, but not
8 limited to, parent corporations), or other entities (i) have a financial interest in the
9 subject matter in controversy or in a party to the proceeding, or (ii) have a
10 nonfinancial interest in that subject matter or in a party that could be substantially
11 affected by the outcome of this proceeding:

- 12 • David Holz, CEO of Midjourney, Inc.
- 13 • Landmark American Insurance Company
- 14 • Lloyds of London
- 15 • Continental Casualty Company
- 16 • Starstone Specialty Insurance Company
- 17 • Relm Insurance Ltd. via Trisura Specialty Insurance Company

18 Respectfully Submitted,

19
20 Dated: July 1, 2025

COOLEY LLP

21 By: /s/ Bobby Ghajar

22 Bobby Ghajar
23 John Paul Oleksiuk
24 Judd Lauter
25 Ellie Dupler

26 *Counsel for Defendant Midjourney, Inc.*