

1 OLIVER BROWN (State Bar No. 335952)
Oliver.Brown@mto.com
2 MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue
3 Fiftieth Floor
Los Angeles, California 90071-3426
4 Telephone: (213) 683-9100
Facsimile: (213) 687-3702

5 Attorneys for Motion Picture Association, Inc.
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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION

11 In Re 17 U.S.C. §512(h) Subpoena to
12
13 CLOUDFLARE, INC.

Case Number: 2:26-mc-00080

**REQUEST TO THE CLERK FOR
ISSUANCE OF SUBPOENA
PURSUANT TO 17 U.S.C. § 512(h)**

1 Petitioner Motion Picture Association, Inc., through undersigned counsel and
2 its authorized representatives, hereby requests that the Clerk of this Court, pursuant
3 to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h), issue the
4 attached proposed subpoena to Cloudflare, Inc. to identify alleged infringers of
5 copyrighted works.

6 Petitioner has satisfied the requirements for issuance of a subpoena pursuant
7 to 17 U.S.C. § 512(h), namely:

- 8 (1) Petitioner has attached hereto a copy of the notification required by 17
9 U.S.C. §512(c)(3)(A);
- 10 (2) Petitioner has concurrently filed a proposed DMCA subpoena; and
- 11 (3) Petitioner has attached hereto the sworn Declaration of Larissa Knapp
12 confirming that the purpose for which the proposed subpoena is sought
13 is to obtain the identity of the alleged infringer(s), and that such
14 information will only be used for the purpose of protecting copyright
15 holders’ rights under U.S. Code Title 17.

16 Having complied with all statutory requirements, Petitioner respectfully
17 requests that the Clerk expeditiously issue and sign the proposed subpoena pursuant
18 to 17 U.S.C. § 512(h)(4) and return it to undersigned counsel for service on the
19 subpoena recipient.

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21 DATED: AUGUST 26, 2026

MUNGER, TOLLES & OLSON LLP

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23 By: /s/ Oliver L. Brown
24 OLIVER L. BROWN

25 Attorney for Motion Picture Association,
26 Inc.