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5 Attorneys for Motion Picture Association, Inc.  
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9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
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12 In Re 17 U.S.C. § 512(h) Subpoena to  
13 CLOUDFLARE, INC.  
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Case Number: 2:26-mc-00043

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

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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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DATED: May 15, 2026

MUNGER, TOLLES & OLSON LLP

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

Attorney for Motion Picture Association,  
Inc.