



Keyonn L. Pope
(312) 471-8771
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April 13, 2022

VIA EMAIL

Cloudflare, Inc.
101 Townsend Street
San Francisco, CA 94107
legal@cloudflare.com
registrar-abuse@cloudflare.com

Case: 1:22-mc-00045
Assigned To : Unassigned
Assign. Date : 4/13/2022
Description: Misc.

Re: *DMCA Notification*

To Whom It May Concern:

I write on behalf of Entertainment Software Association (“ESA”). ESA is a U.S. trade association that represents the interests of the leading publishers of interactive games for video game consoles, personal computers, handheld devices, and the Internet (“ESA Member Companies”). ESA Member Companies own the intellectual property, including copyright, patent, and trademark rights, associated with their entertainment software products. ESA is authorized to represent ESA Member Companies in enforcement actions against third parties that infringe or contribute to the infringement of ESA Member Companies’ intellectual property rights.

We recently learned that Cloudflare, Inc. (“Cloudflare”) is hosting nsw2u.xyz, darkw.pl, rapidu.net, torrentfunk.com, and torrentdownloads.pro (“Infringing Websites”) on its network. The Infringing Websites are distributing unauthorized copies of ESA Member Companies’ copyrighted games. We have a good faith belief that the copyright owner, its agent, or the law have not authorized this activity. We assert that the information in this notification is accurate, based upon the data available to us.

Therefore, we ask that Cloudflare consider the infringing nature of the Infringing Websites operators’ conduct, and whether the Infringing Websites’ activities violate Cloudflare’s terms of services.

This correspondence does not waive any rights to recover damages incurred due to any unauthorized activity. ESA and ESA Member Companies expressly reserve all rights and claims for other relief. In addition, if applicable, ESA’s use of Cloudflare’s required notice form is merely meant to facilitate removal of the infringing material and is not meant to suggest or imply that Cloudflare’s activities and services are within the scope of the DMCA safe harbor.

Cloudflare, Inc.
April 13, 2022
Page 2

Feel free to contact me at kpope@rshc-law.com or (312) 471-8771 to discuss this notice.

Sincerely,

A handwritten signature in black ink, appearing to read 'K.L. Pope', with a stylized flourish at the end.

Keyonn L. Pope