



Mr. Jan van Voorn
Executive Vice President & Chief of Global
Content Protection
Motion Picture Association, Inc.,
On Behalf of the Alliance for Creativity and
Entertainment

15301 Ventura Blvd., Building E
Sherman Oaks, CA 91403
Phone: (818) 995-6600
Email: Jan_vanVoorn@motionpictures.org

May 12, 2020

VIA EMAIL TO LEGAL@CLOUDFLARE.COM
Justin Paine
Cloudflare, Inc., Legal Department
101 Townsend Street
San Francisco, CA 94107

Re: Nites.is

Dear Mr. Paine:

I am writing on behalf of the Alliance for Creativity and Entertainment ("ACE").

ACE is a global coalition of leading content creators and on-demand entertainment services committed to supporting the legal marketplace for video content and addressing the challenge of online piracy. ACE includes some of the world's largest and most respected motion picture and television rights owners including, among many others, Paramount Pictures Corporation, Sony Pictures Entertainment Inc., Universal City Studios LLC, Walt Disney Studios Motion Pictures, Warner Bros. Entertainment Inc., Amazon Content Services LLC and Netflix Studios, LLC (together, the "ACE Members").

ACE is organized for the purpose of preventing and mitigating online theft of copyrighted films and television programs, and undertakes initiatives to identify and take action against piracy threats to create an online environment in which copyrighted film and television content is more secure and online content theft can be addressed more effectively and efficiently.

The ACE Members, whether themselves or through subsidiaries and affiliates, own or are the exclusive licensees of copyrights in a vast library of motion pictures, television programs and audio-visual coverage of sports events (the "Copyrighted Works").

We have determined that one or more users of your system or network have infringed ACE Members' Copyrighted Works via the website nites.is (the "Website"), including the specific Copyrighted Works and corresponding infringing URLs referenced below:





Website	Sample Infringing URL	Infringed Work	Copyright Holder
nites.is	https://nites.is/movies/bad-boys-for-life	Bad Boys for Life (2020)	Columbia Pictures Industries, Inc.
nites.is	https://nites.is/movies/cars-3	Cars 3 (2017)	Disney Enterprises, Inc. and Pixar
nites.is	https://nites.is/movies/bloodshot	Bloodshot (2020)	Columbia Pictures Industries, Inc.
nites.is	https://nites.is/movies/bird-box	Bird Box (2018)	Netflix Studios LLC
nites.is	https://nites.is/movies/yesterday	Yesterday (2019)	Universal City Studios Productions LLLP and Perfect Universe Investment Inc.
nites.is	https://nites.is/movies/a-quiet-place	A Quiet Place (2018)	Paramount Pictures Corp.

Enclosed is a subpoena compliant with the Digital Millennium Copyright Act. The subpoena requires that you provide information concerning the individuals offering infringing material described in this notice. As is stated in the attached subpoena, you are required to disclose to the Motion Picture Association, Inc. (on behalf of the ACE Members) information sufficient to identify the infringer(s). This would include the individuals' names, physical addresses, IP addresses, telephone numbers, e-mail addresses, payment information, account updates and account history.

We are providing this notice based on our good faith belief that the use of motion pictures and television programs owned by the ACE Members in the manner occurring via the websites identified below is not authorized by the copyright owners, their agents, or the law. The information in this notification is accurate and, under penalty of perjury, we are authorized to act on behalf of the ACE Members, which own or control exclusive rights under copyright that are being infringed in the manner described herein. This letter is without prejudice to the rights and remedies of the ACE Members, including to recover damages and any other claims for relief, all of which are expressly reserved.

If you would like to discuss a resolution of this matter, or if you have any questions, please contact me at (818) 995-6600, or via email at Jan_vanVoorn@motionpictures.org.

Very truly yours,





www.alliance4creativity.com

A handwritten signature in blue ink, appearing to read "Jan van Voorn".

Jan van Voorn

Attachment and Enclosure

