

1 MARI T. SAIGAL (State Bar No. 318556)  
Mari.Saigal@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 Plaintiffs  
6  
7  
8

9 UNITED STATES DISTRICT COURT  
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
11

12 In Re 17 U.S.C. § 512(h) Subpoena to  
13 TONIC DOMAINS CORPORATION  
14  
15  
16  
17  
18  
19

Case Number: 2:20-mc-00197

**DECLARATION OF JAN VAN  
VOORN IN SUPPORT OF  
ISSUANCE OF SUBPOENA  
PURSUANT TO 17 U.S.C. § 512(h)**

20 I, Jan van Voorn, the undersigned, declare that:

21 1. I am Executive Vice President and Chief of Global Content Protection  
22 for the Motion Picture Association, Inc., on behalf of Amazon Content Services  
23 LLC, Columbia Pictures Industries, Inc., Disney Enterprises, Inc., Netflix Studios,  
24 LLC, Universal City Studios Productions LLLP, Warner Bros. Entertainment Inc.  
25 (“ACE Members”) who are members of the Alliance for Creativity and  
26 Entertainment (“ACE”), a global coalition of leading content creators and on-  
27 demand entertainment services committed to supporting the legal marketplace for  
28


1 video content and addressing the challenge of online piracy. The ACE Members,  
2 whether themselves or through subsidiaries and affiliates, own the copyrights in the  
3 below referenced copyrighted works.

4       2. The ACE Members (via the Motion Picture Association, Inc.) are  
5 requesting issuance of the attached proposed subpoena that would order Tonic  
6 Domains Corporation to disclose the identities, including names, physical addresses,  
7 IP addresses, telephone numbers, e-mail addresses, payment information, account  
8 updates and account histories of the users operating the websites listed in the  
9 attached **Exhibit A**.

10       3. The purpose for which this subpoena is sought is to obtain the identities  
11 of the individuals assigned to these websites who have exploited ACE Members'  
12 exclusive rights in their copyrighted motion pictures without their authorization.  
13 This information will only be used for the purposes of protecting the rights granted  
14 to ACE Members, the motion picture copyright owners, under Title II of the Digital  
15 Millennium Copyright Act.

16  
17       I declare under penalty of perjury under the laws of the United States of  
18 America that the foregoing is true and correct to the best of my knowledge,  
19 information or belief.

20       Executed at Redondo Beach, California, on October 15, 2020.

21  
22  
23  
24  
25  
26  
27  
28  
  
\_\_\_\_\_  
Jan van Voorn

# **Exhibit A**

**EXHIBIT A**

<b>Website</b>	<b>Sample 1 Infringing Title</b>	<b>Sample 1 Infringing URL</b>	<b>Sample 2 Infringing Title</b>	<b>Sample 2 Infringing URL</b>
1337x.to	Frozen II	<a href="https://1337x.to/torrent/4292403/Frozen-II-2019-1080p-WEBRip-5-1-YTS-YIFY/">https://1337x.to/torrent/4292403/Frozen-II-2019-1080p-WEBRip-5-1-YTS-YIFY/</a>	Beautiful Boy	<a href="https://1337x.to/torrent/3501672/Beautiful-Boy-2018-WEBRip-720p-YTS-YIFY/">https://1337x.to/torrent/3501672/Beautiful-Boy-2018-WEBRip-720p-YTS-YIFY/</a>
5movies.to	Frozen II	<a href="https://5movies.to/movie/frozen-ii-103936/">https://5movies.to/movie/frozen-ii-103936/</a>	Beautiful Boy	<a href="https://5movies.to/movie/beautiful-boy-89573/">https://5movies.to/movie/beautiful-boy-89573/</a>
azm.to	Frozen II	<a href="https://azm.to/movie/frozen-ii">https://azm.to/movie/frozen-ii</a>	Beautiful Boy	<a href="https://azm.to/movie/beautiful-boy">https://azm.to/movie/beautiful-boy</a>
filmpalast.to	Dolittle	<a href="https://filmpalast.to/stream/dolittle-english">https://filmpalast.to/stream/dolittle-english</a>	Beautiful Boy	<a href="https://filmpalast.to/stream/beautiful-boy-2018">https://filmpalast.to/stream/beautiful-boy-2018</a>
goldesel.to	Dolittle	<a href="https://goldesel.to/filme/x264/408600-die-fantastische-reise-des-dr-dolittle-2020-german-ld-bdrip-x264-prd">https://goldesel.to/filme/x264/408600-die-fantastische-reise-des-dr-dolittle-2020-german-ld-bdrip-x264-prd</a>	Beautiful Boy	<a href="https://goldesel.to/filme/1080p/392286-beautiful-boy-2018-german-dl-1080p-bluray-x264-encounters">https://goldesel.to/filme/1080p/392286-beautiful-boy-2018-german-dl-1080p-bluray-x264-encounters</a>
kimcartoon.to	Frozen II	<a href="https://kimcartoon.to/Cartoon/Frozen-II/Movie-HD-2?id=95952">https://kimcartoon.to/Cartoon/Frozen-II/Movie-HD-2?id=95952</a>	Despicable Me	<a href="https://kimcartoon.to/Cartoon/Despicable-Me/Movie?id=2130">https://kimcartoon.to/Cartoon/Despicable-Me/Movie?id=2130</a>
kinox.to	Dolittle	<a href="https://ww2.kinox.to/Stream/Die_fantastische_Reise_des_Dr-Dolittle-1.html">https://ww2.kinox.to/Stream/Die_fantastische_Reise_des_Dr-Dolittle-1.html</a>	Beautiful Boy	<a href="https://ww2.kinox.to/Stream/Triple_Frontier.html">https://ww2.kinox.to/Stream/Triple_Frontier.html</a>
Ololo.to	Frozen II	<a "="" href="https://ololo.to/video/l9gMGgH1IO9MxuJN3r2jYHghHPUilmSGq9ebTCQRFhniqhvit1wgJGq31H4tgaNzEO2CKEIXa2J4MEtsRdEfdQa0NnQLioK+hqBre0PKSt8=">https://ololo.to/video/l9gMGgH1IO9MxuJN3r2jYHghHPUilmSGq9ebTCQRFhniqhvit1wgJGq31H4tgaNzEO2CKEIXa2J4MEtsRdEfdQa0NnQLioK+hqBre0PKSt8=</a>	Beautiful Boy	<a "="" href="https://ololo.to/video/aCl3quQP1h0I06H3BoSjv28gYf/Gis9TrQqdraBSRqKr6MDC90ohuywnqo5SY74rsMrIpw6o20oukoePgYdANZ2hLUgeNC1j3nAM75qDr0=">https://ololo.to/video/aCl3quQP1h0I06H3BoSjv28gYf/Gis9TrQqdraBSRqKr6MDC90ohuywnqo5SY74rsMrIpw6o20oukoePgYdANZ2hLUgeNC1j3nAM75qDr0=</a>
seriesflix.to	Grey's Anatomy Season 7 Episode 11	<a href="https://seriesflix.to/episodio/anatomia-de-grey-7x11/">https://seriesflix.to/episodio/anatomia-de-grey-7x11/</a>	How to Get Away with Murder: Season 5 Episode 11	<a href="https://seriesflix.to/episodio/como-defender-a-un-asesino-5x11-online/">https://seriesflix.to/episodio/como-defender-a-un-asesino-5x11-online/</a>

Website	Sample 1 Infringing Title	Sample 1 Infringing URL	Sample 2 Infringing Title	Sample 2 Infringing URL
swatchseries.to	The Romanoffs Season 1 Episode 1	<a href="https://www1.swatchseries.to/episode/the_romanoffs-2_s1_e1.html">https://www1.swatchseries.to/episode/the_romanoffs-2_s1_e1.html</a>	Grey's Anatomy Season 7 Episode 11	<a href="https://www1.swatchseries.to/episode/greys_anatomy_s7_e11.html">https://www1.swatchseries.to/episode/greys_anatomy_s7_e11.html</a>
vumoo.to	Frozen II	<a href="http://vumoo.to/movies/frozen-2-2019">http://vumoo.to/movies/frozen-2-2019</a>	Beautiful Boy	<a href="http://vumoo.to/movies/beautiful-boy-2018">http://vumoo.to/movies/beautiful-boy-2018</a>
bs.to	Grey's Anatomy Season 7 Episode 11	<a href="https://bs.to/serie/Grey-s-Anatomy/7/11-Rueckkehr/en">https://bs.to/serie/Grey-s-Anatomy/7/11-Rueckkehr/en</a>	The Romanoffs Season 1 Episode 1	<a href="https://bs.to/serie/The-Romanoffs/1/1-Die-blaue-Stunde/de">https://bs.to/serie/The-Romanoffs/1/1-Die-blaue-Stunde/de</a>
cine.to	Frozen II	<a href="https://cine.to/#tt04520988">https://cine.to/#tt04520988</a>	The Fate Of The Furious	<a href="https://cine.to/#tt04630562">https://cine.to/#tt04630562</a>
stream.to	Frozen II	<a href="https://stream.to/de/movie/200196-die-eiskoenigin-2">https://stream.to/de/movie/200196-die-eiskoenigin-2</a>	Beautiful Boy	<a href="https://stream.to/de/movie/144579-beautiful-boy">https://stream.to/de/movie/144579-beautiful-boy</a>
kinomax.to	Triple Frontier	<a href="https://kinomax.to/13030-triple-frontier-2019.html">https://kinomax.to/13030-triple-frontier-2019.html</a>	Dolittle	<a href="https://kinomax.to/10407-die-fantastische-reise-des-dr-dolittle-2020.html">https://kinomax.to/10407-die-fantastische-reise-des-dr-dolittle-2020.html</a>
HD-streams.to	Spider-Man: Homecoming	<a href="https://hd-streams.to/en/movies/spider-man-homecoming/">https://hd-streams.to/en/movies/spider-man-homecoming/</a>	Wonder Woman	<a href="https://hd-streams.to/en/movies/wonder-woman/">https://hd-streams.to/en/movies/wonder-woman/</a>
cinenator.to	Dolittle	<a href="https://www.cinenator.to/movies/die-fantastische-reise-des-dr-dolittle/">https://www.cinenator.to/movies/die-fantastische-reise-des-dr-dolittle/</a>	Beautiful Boy	<a href="https://www.cinenator.to/movies/beautiful-boy/">https://www.cinenator.to/movies/beautiful-boy/</a>
movie4k.to	Despicable Me	<a href="https://www5.movie4k.to/Despicable-Me-watch-movie-7269343.html">https://www5.movie4k.to/Despicable-Me-watch-movie-7269343.html</a>	Wonder Woman	<a href="https://www5.movie4k.to/Wonder-Woman-watch-movie-8678867.html">https://www5.movie4k.to/Wonder-Woman-watch-movie-8678867.html</a>
ddl.to	Frozen II	<a href="https://ddl.to/h9bnasbib39l">https://ddl.to/h9bnasbib39l</a>	Spider-Man: Far from Home	<a href="https://ddl.to/j4hrpve4b7xr">https://ddl.to/j4hrpve4b7xr</a>
vup.to	Joker	<a href="https://vup.to/fgn5yv0lz501">https://vup.to/fgn5yv0lz501</a>	Frozen II	<a href="https://vup.to/4fj6c1jcs9vn">https://vup.to/4fj6c1jcs9vn</a>