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9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
11

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

Case Number: 2:20-mc-00278

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

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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 and Paramount Pictures Corporation (“ACE Members”) who are members of the
26 Alliance for Creativity and Entertainment (“ACE”), a global coalition of leading
27 content creators and on-demand entertainment services committed to supporting the
28

1 legal marketplace for video content and addressing the challenge of online piracy.
2 The ACE Members, whether themselves or through subsidiaries and affiliates, own
3 the copyrights in the 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 November 4, 2020.

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Jan van Voorn

Exhibit A

EXHIBIT A

Website	Sample 1 Infringing Title	Sample 1 Infringing URL	Sample 2 Infringing Title	Sample 2 Infringing URL
lordfilm.to	Dolittle	https://my.lordfilms.to/40089-udivitelnoe-puteshestvie-doktora-dulittla.html	Wonder Woman	https://my.lordfilms.to/13644-chudo-zhenschina.html
ddl-warez.to	Dolittle	https://ddl-warez.to/download/636434/Die.fantastische.Reise.des.Dr.Dolittle.2020.German.DL.2160p.UHD.BluRay.x265-ENDSTATION/	Beautiful Boy	https://ddl-warez.to/download/609497/Beautiful.Boy.2018.German.DL.1080p.BluRay.AVC-SAVIOURHD/
boerse.to	Frozen II	https://boerse.to/thema/die-eiskoenigin-2-frozen-ii-2019-german-dts-dl-1080p-bluray-x265-fd.2681786/	Beautiful Boy	https://boerse.to/thema/beautiful-boy-2018-german-dts-dl-1080p-bluray-x264-vector.2707148/
pepecine.to	Frozen II	https://pepecine.to/titles/dG1kYnxtb3ZpZXwzMzA0NTc%3D/frozen-2	Beautiful Boy	https://pepecine.to/titles/dG1kYnxtb3ZpZXw0NTE5MTU%3D/beautiful-boy-siempre-ser-s-mi-hijo
ymovies.to	Frozen II	https://ymovies.to/film/frozen-ii-83235/	Beautiful Boy	https://ymovies.to/film/beautiful-boy-2018-78847/
pelis24.to	Wonder Woman	https://www.pelis24.to/old/peliculas/ver-online-wonder-woman-1/	Beautiful Boy	https://www.pelis24.to/old/peliculas/ver-online-beautiful-boy/
kinoz.to	Dolittle	https://www.kinoz.to/Stream/Die_fantastische_Reise_des_Dr-Dolittle-1.html	Wonder Woman	https://www.kinoz.to/Stream/Wonder_Woman-4.html
monova.to	Dolittle	https://monova.to/BD907DDD1BAE61EC35CD51FAD818285932951DDE	Triple Frontier	https://monova.to/476CDD2EBB64B33F275DA70B42A4CE0C14831E21
unblocked.to	Frozen II	https://1337x2.unblocked.to/torrent/4292403/Frozen-II-2019-1080p-WEBRip-5-1-YTS-YIFY/	Beautiful Boy	https://1337x2.unblocked.to/search/Beautiful+Boy/1/

Website	Sample 1 Infringing Title	Sample 1 Infringing URL	Sample 2 Infringing Title	Sample 2 Infringing URL
glodls.to	Frozen II	http://glodls.to/frozen-ii-2019-1080p-bluray-ac3-x264-mrsk-f-10881892.html	Beautiful Boy	http://glodls.to/beautiful-boy-2018-2160p-web-dl-hdr-ddp5-1-h265-cmrg-tgx-f-9874370.html
byte.to	Frozen II	https://byte.to/category/MicroHD-3D/Die-Eiskoenigin-2-2019-3D-HOU-2019-German-940p-AC3-microHD-x264-RAIST-1085275.html	Beautiful Boy	https://byte.to/category/SD-XviD/Beautiful-Boy-2018-German-Ac3-BdriP-XviD-HaN-1057284.html
enstream.to	Frozen II	https://enstream.to/film-la-reine-des-neiges-2-YpXWsF-streaming	Beautiful Boy	https://enstream.to/film-my-beautiful-boy-S9Tn-streaming
series24.to	The Romanoffs Season 1 Episode 1	https://www.series24.to/serie/the-romanoffs/season-1/episodio-1-621/	Watchmen S1E1	https://www.series24.to/serie/watchmen/season-1/episodio-1-1107/
hdgo.to	Frozen II	http://hdgo.to/movie/zGe0253x-frozen-2.html	Beautiful Boy	http://hdgo.to/movie/Xvjy6lnd-beautiful-boy-2018.html
ilgeniodellostreaming.to	Dolittle	https://ilgeniodellostreaming.to/film/dolittle-streaming/	Beautiful Boy	https://ilgeniodellostreaming.to/film/beautiful-boy-streaming-ita/
movie-blog.to	Frozen II	https://movie-blog.to/die-eiskoenigin-2-frozen-ii-2019-3d-multi-complete-bluray-sharphd/	Beautiful Boy	https://movie-blog.to/beautiful-boy-2018-german-ac3-bdrip-xvid-han/
torrentgalaxy.to	Frozen II	https://torrentgalaxy.to/torrent/14008782/Frozen-II--2019---2160p---HDR---bluray---WMAN-Lord-	Beautiful Boy	https://torrentgalaxy.to/torrent/83766/Beautiful-Boy-2018-BRRip-XviD-AC3-EVO-TGx-

Website	Sample 1 Infringing Title	Sample 1 Infringing URL	Sample 2 Infringing Title	Sample 2 Infringing URL
goojara.to	50 First Dates	https://www.goojara.to/moWmJK	Last Flag Flying	https://www.goojara.to/mXng1d
supernova.to	Aladdin	https://supernova.to/m86MJ1	The Ridiculous 6	https://supernova.to/mRzlx5
levidia.to	Breakfast at Tiffany's	https://www.levidia.to/movie.php?watch=breakfast-at-tiffanys	Scoob!	https://www.levidia.to/movie.php?watch=scoob
flixtor.to	Young Sheldon S1E1	https://flixtor.to/watch/tv/4017746/young-sheldon/season/1/episode/1	Watchmen S1E1	https://flixtor.to/watch/tv/4467058/watchmen/season/1/episode/1
hdss.to	Spider-Man: Homecoming	https://hdss.to/spider-man-homecoming-q/	Bird Box	https://hdss.to/bird-boxx/
solarmovie.to	Maleficent	https://solarmovie.to/movie/maleficent-1610.html	Harry Potter and the Chamber of Secrets	https://solarmovie.to/movie/harry-potter-and-the-chamber-of-secrets-1554.html
soap2day.to	Spider-Man: Homecoming	https://soap2day.to/movie_aTo00DY40w.html	Bird Box	https://soap2day.to/movie_aTo1NDg5Ow.html