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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 TONIC DOMAINS CORPORATION
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Case Number: 2:20-mc-00279

**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 Disney Enterprises, Inc. and
23 Warner Bros. Entertainment Inc. (“ACE Members”) who are members of the
24 Alliance for Creativity and Entertainment (“ACE”), a global coalition of leading
25 content creators and on-demand entertainment services committed to supporting the
26 legal marketplace for video content and addressing the challenge of online piracy.
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1 The ACE Members, whether themselves or through subsidiaries and affiliates, own
 2 the copyrights in the below referenced copyrighted works.

3 2. The ACE Members (via the Motion Picture Association, Inc.) are
 4 requesting issuance of the attached proposed subpoena that would order Tonic
 5 Domains Corporation (“Tonic”) to disclose the identities, including names, physical
 6 addresses, IP addresses, telephone numbers, e-mail addresses, payment information,
 7 account updates and account histories of the users operating the huhu.to website and
 8 service. Huhu.to utilizes Tonic servers to facilitate access to infringing content by
 9 connecting users of the “Watched” mobile application to cyberlockers containing
 10 infringing content. For example, huhu.to has facilitated access to infringing content
 11 located on the following websites:

Infringed Title	Huhu.to Link	Cyberlocker Link
Beauty and the Beast	https://huhu.to/kinox/source.watched	https://clipboard.cc/g/VHUeR8PndLfi https://gounlimited.to/25fjozxp2rku/Beauty.and.the.Beast.2017.x264-Bluray-480p.AAC-2.0-SPARKS_tt2771200.mkv https://gounlimited.to/embed-cj0uuwp9jfoh.html https://gounlimited.to/embed-owe0eumcehox.html https://mixdrop.to/e/3nnop6zkaw4pzq/ https://mixdrop.to/e/n0lvk0zohll4l31/ https://upstream.to/embed-dred7dv9aq2p.html https://upstream.to/embed-ouagi2k7w7lf.html
It Chapter Two	https://huhu.to/hot-movies-de-2/source.watched	https://vivo.sx/745eb9d09f https://vivo.sx/72a39ee1cd https://vidlox.me/embed-kvrorz6sahii.html https://clipwatching.com/2mq4fiycwhoc/Es.Kapitel.2.German.2019.AC3.BDRiP.x264-XF.mp4.html https://gounlimited.to/embed-pg2eysf6w911.html

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		https://gounlimited.to/embed-8tdf65qhj9ak.html http://upstream.to/yl7k8m9vw4w2 https://mixdrop.to/e/dq3wzg8wt7xxk7/ https://upstream.to/embed-s06u0ckeboPd.html https://upstream.to/embed-unyknDvpthlt.html https://uqload.com/embed-c8reikcn4yh3.html https://mixdrop.co/e/9n18v771un143n https://cloudvideo.tv/embed-anyhbhr3lyjd.html
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3. The purpose for which this subpoena is sought is to obtain the identities of the individuals assigned to these websites who have exploited ACE Members' exclusive rights in their copyrighted motion pictures without their authorization. This information will only be used for the purposes of protecting the rights granted to ACE Members, the motion picture copyright owners, under Title II of the Digital Millennium Copyright Act.

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

Executed at Redondo Beach, California, on November 4, 2020.



Jan van Voorn