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6 Attorneys for Motion Picture Association, Inc.

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

11 In Re 17 U.S.C. § 512(h) Subpoena to
12
13 CLOUDFLARE, INC.

Case Number: 2:20-mc-00312

**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., Paramount
24 Pictures Corp., and Universal City Studios Productions LLLP (“ACE Members”)
25 members of the Alliance for Creativity and Entertainment (“ACE”), a global
26 coalition of leading content creators and on-demand entertainment services
27 committed to supporting the legal marketplace for video content and addressing the
28 challenge of online piracy. The ACE Members, whether themselves or through


1 subsidiaries and affiliates, own the copyrights in the below referenced copyrighted
2 works.

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

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

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

18 Executed at Redondo Beach, California, on November 17, 2020.

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Jan van Voorn

EXHIBIT A

Website	Sample 1 Infringing Title	Sample 1 Infringing URL	Sample 2 Infringing Title	Sample 2 Infringing URL
0123movie.net	Dolittle	https://ww4.0123movie.net/movie/dolittle-100331.html	Beautiful Boy	https://ww4.0123movie.net/movie/beautiful-boy-27433.html
0123movies.com	Frozen II	https://www9.0123movies.com/movies-frozen-ii-2019-0123movies.html	Beautiful Boy	https://www9.0123movies.com/movies-beautiful-boy-2018-0123movies.html
123movies.net	Frozen II	http://123movies.net/watch/zGe0253x-frozen-2.html	Beautiful Boy	http://123movies.net/watch/Xvjy6lnd-beautiful-boy-2018.html
123moviesfree.com	Frozen II	http://www13.123moviesfree.com/watch/frozen-ii-2019-online-free-123movies.html	50 First Dates	http://www13.123moviesfree.com/watch/50-first-dates-2004-online-free-123movies.html
123movies-free.sc	Frozen II	https://123movies-free.sc/mov/frozen-ii-2019/	Beautiful Boy	https://123movies-free.sc/mov/beautiful-boy-2018/
azm.to	Frozen II	https://azm.to/movie/frozen-ii	Beautiful Boy	https://azm.to/movie/beautiful-boy
cpasmal.info	Dolittle	https://www.cpasmal.info/5851-le-voyage-du-dr-dolittle.html	Beautiful Boy	https://www.cpasmal.info/1364-my-beautiful-boy.html
ethor.net	Last Flag Flying	https://ethor.net/dp#/details.php?id=369300	10 Cloverfield Lane	https://ethor.net/dp#/details.php?id=439890
eurostreaming.name	Grey's Anatomy Season 7 Episode 11	https://eurostreaming.name/grey-s-anatomy-episodi/	The Romanoffs Season 1 Episode 1	https://eurostreaming.name/the-romanoffs/

Website	Sample 1 Infringing Title	Sample 1 Infringing URL	Sample 2 Infringing Title	Sample 2 Infringing URL
eurostreamingtv.com	Grey's Anatomy Season 7 Episode 11	https://ww2.eurostreamingtv.com/greys-anatomy-links/	The Romanoffs Season 1 Episode 1	https://ww2.eurostreamingtv.com/the-romanoffs-1/
filmpalast.to	Dolittle	https://filmpalast.to/stream/dolittle-english	Frozen II	https://filmpalast.to/stream/die-eiskonigin-2
goldesel.to	Dolittle	https://goldesel.to/filme/x264/408600-die-fantastische-reise-des-dr-dolittle-2020-german-ld-bdrip-x264-prd	Beautiful Boy	https://goldesel.to/filme/1080p/392286-beautiful-boy-2018-german-dl-1080p-bluray-x264-encounters
hdfilme.cx	Frozen II	https://hdfilme.cx/filme1/die-eiskonigin-2-13605-stream	Beautiful Boy	https://hdfilme.cx/filme1/beautiful-boy-12550-stream
hdfull.io	Frozen II	https://hdfull.io/pelicula/frozen-ii	Beautiful Boy	https://hdfull.io/pelicula/beautiful-boy
hd-streams.org	Dolittle	https://hd-streams.org/movies/die-fantastische-reise-des-dr-dolittle-2020	Frozen II	https://hd-streams.org/movies/die-eiskonigin-2-2019
knaben.net	Beautiful Boy	https://knaben.net/s/keepgoing.php?url=/torrent/28186922/Beautiful.Boy.2018.HDRip.AC3.X264-CMRG	Frozen II	https://knaben.net/s/keepgoing.php?url=/torrent/36054941/Frozen.II.2019.1080p.BluRay.x264.AAC5.1
magnetdl.com	Frozen II	https://www.magnetdl.com/file/4495427/frozen-ii-2019.1080p.dsnp-.web-dl.hin-multi.aac.2.0.h264-telly/	Beautiful Boy	https://www.magnetdl.com/file/4062640/beautiful.boy.2018.2160p.web-rip.hdr.ddp5.1.hevc-ddr-ethd/
mejortorrentt.net	Frozen II	http://www.mejortorrentt.net/peli-descargar-torrent-21774-Frozen-II.html	Dolittle	http://www.mejortorrentt.net/peli-descargar-torrent-21906-Las-aventuras-del-Doctor-Dolittle.html
movidy.co	Frozen II	https://movidy.co/peliculas/p330457-ver-frozen-2-online	Beautiful Boy	https://movidy.co/peliculas/p451915-ver-beautiful-boy-online

Website	Sample 1 Infringing Title	Sample 1 Infringing URL	Sample 2 Infringing Title	Sample 2 Infringing URL
pctmix.com	Frozen II	https://pctmix.com/descargar/peliculas-castellano/frozen-ii-2020-/blurayrip-ac3-5-1/pctnew-org	Dolittle	https://pctmix.com/descargar/peliculas-castellano/las-aventuras-del-doctor-dolittle-2020-/blurayrip-ac3-5-1/
pelismart.com	Frozen II	https://pelismart.com/pelicula-frozen-2-online/	Beautiful Boy	https://pelismart.com/beautiful-boy-siempre-seras-mi-hijo/
tekilaz.co	Frozen II	https://tekilaz.co/movies/frozen-ii-a1/	Beautiful Boy	https://tekilaz.co/movies/beautiful-boy-siempre-seras-mi-hijo/
rarbmirror.com	Frozen II	https://rarbmirror.com/torrent/8rkf236	Beautiful Boy	https://rarbmirror.com/torrent/z2toxrd
repelishd.tv	Frozen II	https://repelishd.tv/pelicula/frozen-2-online-7kxrwa/	Beautiful Boy	https://repelishd.tv/pelicula/ver-beautiful-boy-online-espanol/
seriesflix.to	Grey's Anatomy Season 7 Episode 11	https://seriesflix.to/episodio/anatomia-de-grey-7x11/	How to Get Away with Murder: Season 5 Episode 11	https://seriesflix.to/episodio/como-defender-a-un-asesino-5x11-online-gratis/
tirexo.pro	Dolittle	https://www.tirexo.pro/films-gratuit/533243-le-voyage-du-dr-dolittle-WEB-DL%201080p-VOSTFR.html	Beautiful Boy	https://www.tirexo.pro/films-gratuit/462729-my-beautiful-boy-WEB-DL%201080p-French.html
topstreamfilm.com	Frozen II	https://topstreamfilm.com/die-eiskoenigin-2-stream-6	Charlie's Angels (2019)	https://topstreamfilm.com/3-engel-fuer-charlie
torrentdownloads.me	Frozen II	https://www.torrentdownloads.me/torrent/1668932748/Frozen-II-2019-MULTI-BDRIP-1080p-X264-AAC-MINION	Beautiful Boy	https://www.torrentdownloads.me/torrent/1668848969/Beautiful-Boy-2018-1080p-x264-%5BExYu-Subs%5D-mp4
vidcorn.tv	Frozen II	https://vidcorn.tv/pelicula/ver-frozen-2	Beautiful Boy	https://vidcorn.tv/pelicula/ver-beautiful-boy

Website	Sample 1 Infringing Title	Sample 1 Infringing URL	Sample 2 Infringing Title	Sample 2 Infringing URL
videospider.stream	Frozen II	https://videospider.stream/personal?key=y6X31ZjjjQuMHntX&video_id=tt4520988	Beautiful Boy	https://videospider.stream/personal?key=y6X31ZjjjQuMHntX&video_id=tt4520988
vumoo.to	Frozen II	http://vumoo.to/movies/frozen-2-2019	Beautiful Boy	http://vumoo.to/movies/beautiful-boy-2018
yesmovies.so	Frozen II	https://www1.yesmovies.so/film/frozen-ii/watching.html	Beautiful Boy	https://www1.yesmovies.so/film/beautiful-boy/watching.html
zone-annuaire.top	Frozen II	https://zone-annuaire.top/?p=film&id=14970-la-reine-des-neiges-II	Dolittle	https://zone-annuaire.top/?p=film&id=15820-le-voyage-du-dr-dolittle