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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 CLOUDFLARE, INC.
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Case Number: 2:20-mc-00321

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

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

22 1. I am Executive Vice President and Chief of Global Content Protection
23 for the Motion Picture Association, Inc., on behalf of Disney Enterprises, Inc.,
24 Paramount Pictures Corp., Sony Pictures Entertainment Inc., and Universal City
25 Studios Productions LLLP (“ACE Members”) who are members of the Alliance for
26 Creativity and Entertainment (“ACE”), a global coalition of leading content creators
27 and on-demand entertainment services committed to supporting the legal
28 marketplace for video content and addressing the challenge of online piracy. The

1 ACE Members, whether themselves or through subsidiaries and affiliates, own the
 2 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 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 sentratv.com and
 8 123tvnow.com.

9 3. Sentratv.com utilizes Cloudflare servers to operate a website that sells
 10 illegal IPTV subscriptions, which facilitate access to infringing content streaming
 11 from third-party servers. For example, Sentratv.com has facilitated access to
 12 infringing content located at the following websites:

Infringed Title	Sentratv.com Link	Channel Backend Link
Blue Bloods, S02E22	Sentratv.com	http://11live01.akamaized.net/FT1_WGN_AMERICA/mono.m3u8?token=JPICAy%2B0Uqke%2BdySK06XC7O5Tp9NKENQ%2BATuEja7MRrrNtyc%2BBTWSx9fNHWCpzuUNMBSEAlfqmQBIY4LpIEiLhS1afzELyJJRu33oDjTOFFw3OZFaPDGFph3Xh0T4rQm8VOkxk2jALeYCRTWYlebNEQkibd0SQc98%2BrjITARS%2FRlsyqAC%2Bz72bNii82pL37bDM8BeZxAvWMnC1sMMsF9sxDg%3D%3D
Searching	Sentratv.com	http://ft4.cdndelivery.stream/FT4_FXX/mono.m3u8?token=JPnTR6%2FqG%2F%2BhbTcFCnyfhHC5Tp9NKENQ%2BATuEja7MRrrNtyc%2BBTWSx9fNHWCpzuUNM3rir%2BTUgWJIF80%2FmS30XTCy5wKIWQ7hBRAbq1k4ka4BtAwfpMZdpxA0PQA0zy7OHtOO%2Fa1EUUsQfPF7eCKc9uBEInfX43YXfuEQxEnDPlovUM7kv4ep86DZxFzd5zgNwZiBqvfdptctPkrd2FpsJITw%3D%3D

1 4. Likewise, 123tvnow.com utilizes Cloudflare servers to operate a
 2 website that facilitates free access to infringing content streaming from third-party
 3 servers. For example, 123tvnow.com has facilitated access to infringing content
 4 located at the following websites:

Infringed Title	123tvnow.com Link	Channel Backend Link
Chicago PD, S02E17	http://123tvnow.com/watch/usa-network/	http://cte-4-54-539.sub8.cachefly.xyz/live/wr2aeslu/chunks.m3u8?wmsAuthSign=c2VydmVyX3RpbWU9MTEvMi8yMDIwIDg6MTE6NTQgUE0maGFzaF92YWx1ZT1iSlplYIBNFNkK2I2QzR3Zk9Md29BPT0mdmFsaWRtaW51dGVzPTEyMCZzdHJtX2xlbj0xMw==
Sweet Home Alabama	http://123tvnow.com/watch/usa-network/	http://srm-3-95-549.sub1.azurems.xyz/live/wr2aeslu/chunks.m3u8?wmsAuthSign=c2VydmVyX3RpbWU9MTEvNC8yMDIwIDg6MTM6NDI0UE0maGFzaF92YWx1ZT05T0s0c01oZnZGZIBHQIR0L3JLbXIRPT0mdmFsaWRtaW51dGVzPTEyMCZzdHJtX2xlbj0xMw==

18 4. The purpose for which this subpoena is sought is to obtain the identities
 19 of the individuals assigned to these websites who have exploited ACE Members'
 20 exclusive rights in their copyrighted motion pictures without their authorization.
 21 This information will only be used for the purposes of protecting the rights granted
 22 to ACE Members, the motion picture copyright owners, under Title II of the Digital
 23 Millennium Copyright Act.

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 25 I declare under penalty of perjury under the laws of the United States of
 26 America that the foregoing is true and correct to the best of my knowledge,
 27 information or belief.
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Executed at Redondo Beach, California, on December 1, 2020.



Jan van Voorn