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 9 UNITED STATES DISTRICT COURT
 10 CENTRAL DISTRICT OF CALIFORNIA
 11 WESTERN DIVISION
 12

13 PARAMOUNT PICTURES
 CORPORATION; UNIVERSAL CITY
 14 STUDIOS PRODUCTIONS LLLP;
 UNIVERSAL CONTENT
 15 PRODUCTIONS LLC; UNIVERSAL
 TELEVISION LLC; WARNER BROS.
 16 ENTERTAINMENT INC.,
 COLUMBIA PICTURES
 17 INDUSTRIES, INC.; DISNEY
 ENTERPRISES, INC.; NETFLIX
 18 STUDIOS, LLC; NETFLIX US, LLC;
 and NETFLIX WORLDWIDE
 19 ENTERTAINMENT, LLC,

20 Plaintiffs,

21 vs.

22 DOES 1-10 d/b/a PRIMEWIRE,
 23 Defendants.
 24

Case No. 2:21-cv-09317-MCS-SK

**DECLARATION OF JAN VAN
 VOORN IN SUPPORT OF
 PLAINTIFFS' REPLY IN SUPPORT
 OF MOTION [1] TO MODIFY
 PERMANENT INJUNCTION AND
 [2] FOR MORE TIME TO
 CONDUCT DAMAGES
 DISCOVERY**

Judge: Hon. Mark C. Scarsi
 Date: Monday, August 22, 2022
 Time: 9:00 a.m.
 Courtroom: 7C

Filed concurrently with
 (1) Plaintiffs' Reply in Support of
 Motion to Modify Injunction; and
 (2) Declaration of Shannon Aminirad

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DECLARATION OF JAN VAN VOORN

I, Jan van Voorn, declare as follows:

1. I am Executive Vice President and Chief, Global Content Protection (“GCP”) Enforcement and Operations, at the Motion Picture Association, Inc. (“MPA”), where I have worked since 2013. I previously submitted declarations, dated December 3, 2021, February 17, 2022, March 11, 2022, and July 19, 2022.¹ This declaration provides additional information regarding the transfer of hydrawire.tv to Plaintiffs’ control. Except as otherwise noted, the contents of this declaration are based on facts within my personal knowledge or facts provided to me by members of the GCP team working at my direction. If called as a witness in this action, I could and would testify competently to the contents of this declaration.
2. On or about July 23, 2022, GCP investigators used the authorization code provided in correspondence from hydrawi@runbox.com to initiate a transfer of the hydrawire.tv domain to the MPA’s control.
3. On or about August 1, 2022, GCP investigators confirmed that hydrawire.tv has been transferred to the MPA. The domain expiration date for hydrawire.tv is April 21, 2025.

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¹ I understand that my February 17 declaration was filed February 18, 2022, and my March 11 declaration was filed March 12, 2022.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on August 8, 2022 at Redondo Beach, California.



Jan van Voorn