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

**SECOND SUPPLEMENTAL
DECLARATION OF JAN VAN
VOORN IN SUPPORT OF
PLAINTIFFS' NOTICE OF
DEFENDANTS' CHANGES TO
PRIMEWIRE AND AMENDED
REQUEST FOR PERMANENT
INJUNCTIVE RELIEF**

**RE: ECF No. 36 MOTION FOR
PARTIAL DEFAULT JUDGMENT
AND PERMANENT INJUNCTION
(UNDER SUBMISSION)**

Judge: Hon. Mark C. Scarsi
Courtroom: 7C

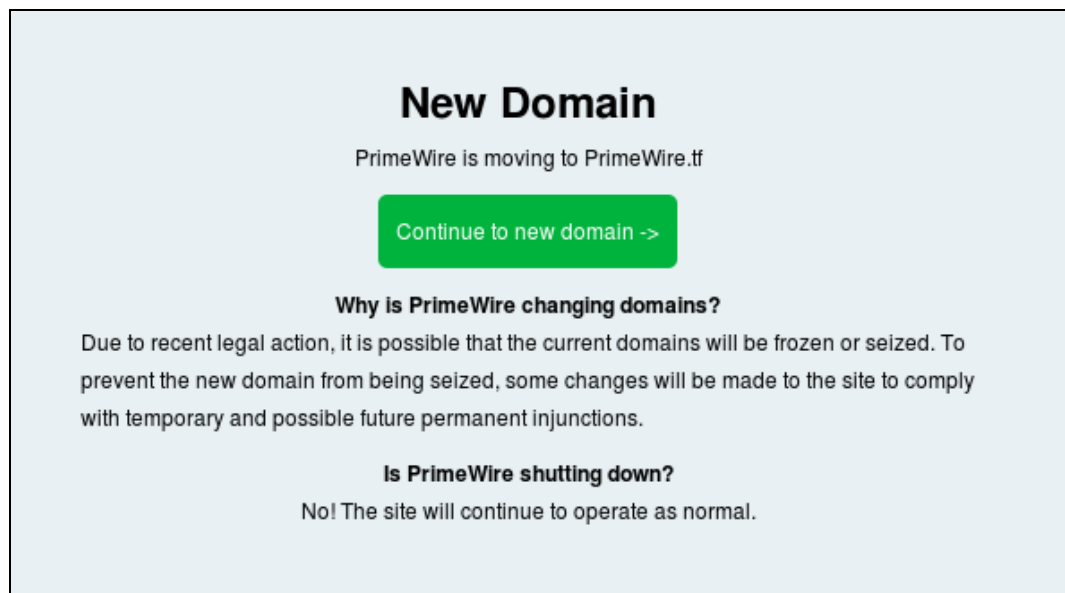
Filed concurrently with
(1) Notice of Defendants' Changes to
PrimeWire and Amended Request for
Injunctive Relief
(2) Amended Proposed Permanent
Injunction

DECLARATION OF JAN VAN VOORN

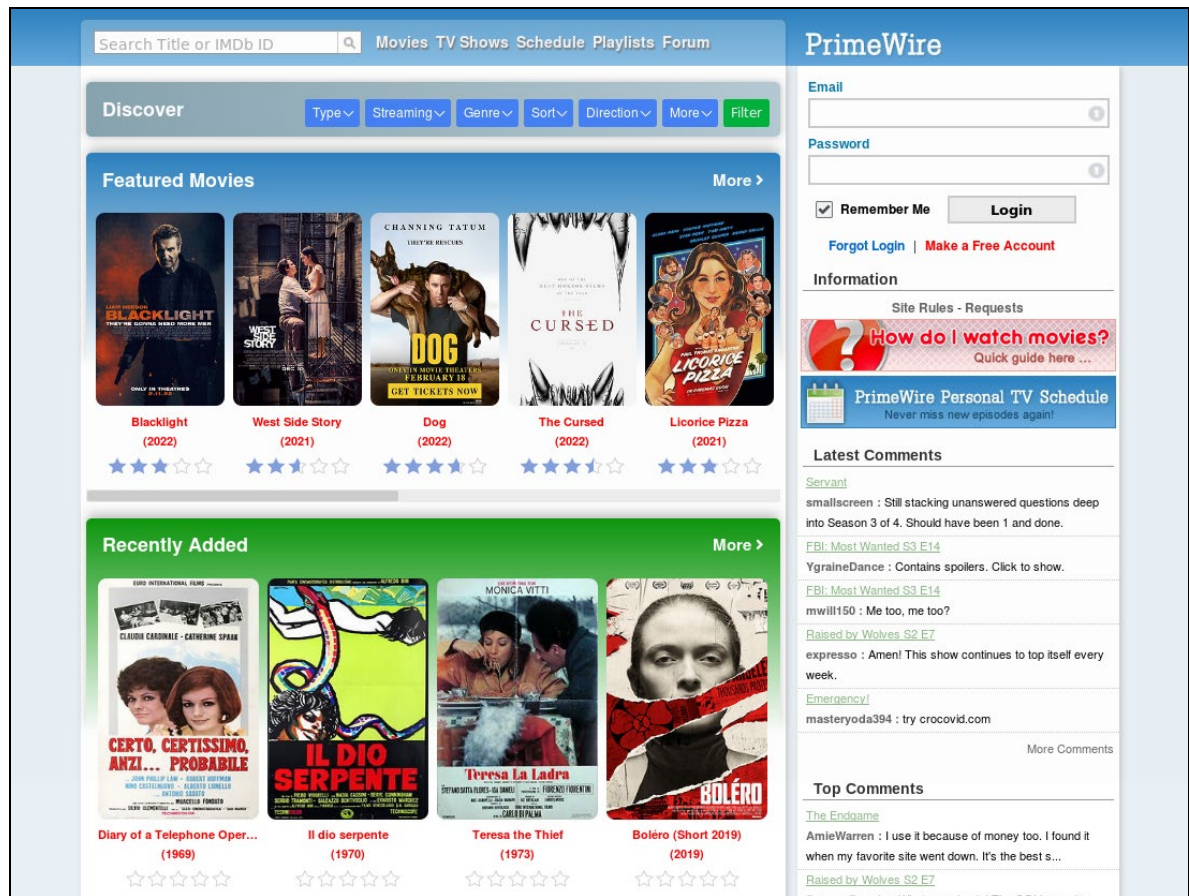
I, Jan van Voorn, declare as follows:

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 and February 17, 2022. This declaration provides additional information discovered this week in the course of GCP’s investigation of PrimeWire. 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. My team discovered, on March 8, 2022, that Defendants’ PrimeWire Websites, www.primewire.li and www.primewire.vc, while still active, now display only a message that directs Defendants’ users to a newly created PrimeWire Website, www.primewire.tf, and links to that new website. Attached hereto as **Exhibit A** and below is a true and correct copy of this message.



3. The organization and appearance of www.primewire.tf is largely identical to the organization and appearance of the other PrimeWire Websites, which I have described in my prior declarations. The website www.primewire.tf has the same general landing page, categories, movie and television show title pages, search functionality, and other features as were located on the other PrimeWire Websites. For example, attached hereto as **Exhibit B** and reproduced below is a true and correct copy of the homepage of www.primewire.tf as of March 10, 2022.



4. Based on my team's investigation of the WHOIS registration information, the new domain is hosted by Cloudwall Ltd. The domain name registrar is Sarek Oy, which is the same as www.primewire.li and www.primewire.vc. The domain name registry for www.primewire.tf is Association Française pour le Nommage Internet en Coopération (A.F.N.I.C.).

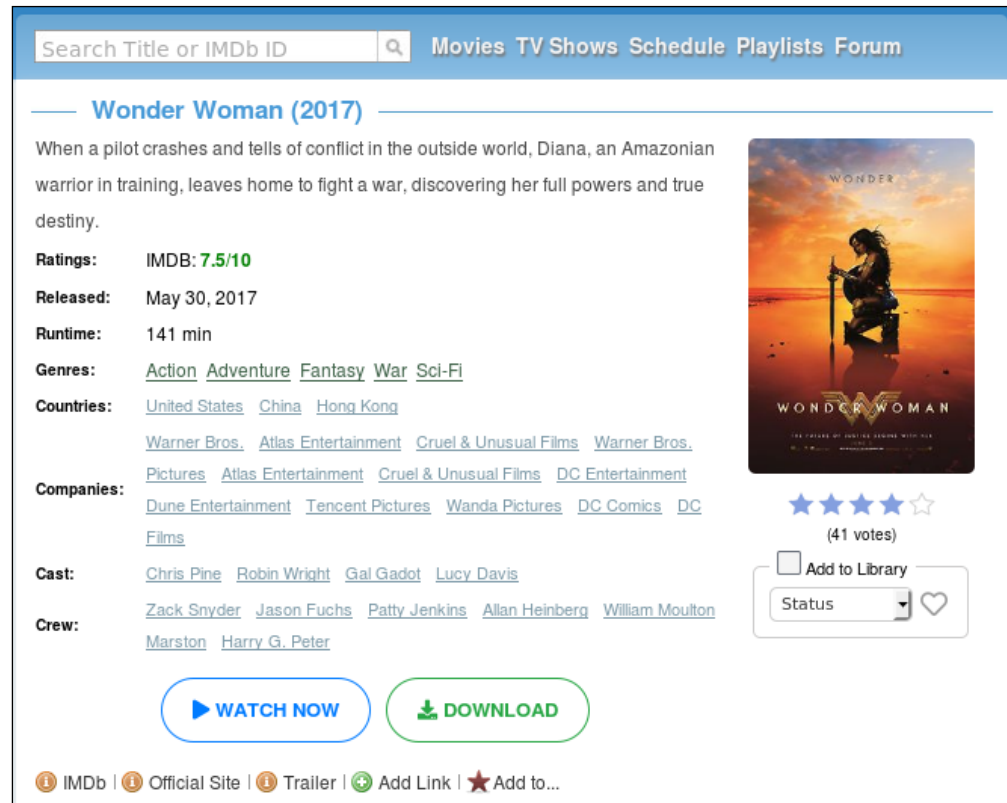
5. As of March 8, 2022, links to receive streams of Plaintiffs' copyrighted movies appeared to be operational. On that day, GCP investigators requested and

1 received a stream of the movie *Wonder Woman* (2017) through a link available on
2 the www.primewire.tf page for that movie.

3 6. Since March 8, Defendants appear to have made some changes to
4 www.primewire.tf. On March 9, GCP investigators observed that links to the
5 unauthorized source copies had been removed from the title pages for movies and
6 television shows on the site. For example, on the page for *Wonder Woman* (2017),
7 there are currently no links and GCP investigators are not currently able to receive
8 streams of that title through PrimeWire. Attached hereto as **Exhibit C** is a true and
9 correct copy of a screenshot of the page for *Wonder Woman* (2017) on
10 www.primewire.tf.

11 7. In connection with enforcement proceedings outside the United States,
12 PrimeWire has taken actions in an attempt to enable its users to continue using the
13 service to access unauthorized streams, notwithstanding court orders that have
14 restricted access to the PrimeWire websites. For example, in response to the court
15 orders of other jurisdictions that blocked access to PrimeWire websites, Defendants
16 created additional “mirror” websites that allowed users to get around the orders by
17 utilizing different top-level domains.

18 8. The removal of certain links to unauthorized streams does not
19 necessarily mean that streams of that nature are not currently available through
20 primewire.tf. When not logged into an account, the *Wonder Woman* (2017) page,
21 for instance, contains “Watch Now” and “Download” buttons as reflected below:
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These options do not appear when logged into a PrimeWire user account. These buttons send the user to Unlimited Streaming (unltdentertainment.co). Unlimited Streaming appears to require credit card information for access. Defendants previously linked to this service until the day after the Complaint was filed. See ECF No. 16, Declaration of Jan van Voorn ¶ 32.

9. In addition, www.primewire.tf continues to solicit users to request and add links. Attached hereto as **Exhibit D** is a true and correct copy of the FAQ page on www.primewire.tf, which informs users how to request links. Each page for a television show or movie also displays an “Add Link” button. The button takes users to a page where they are able to submit links for videos. Attached hereto as **Exhibit E** and reproduced below is a true and correct copy of screenshots displaying this process.

Submit a link

Please read the site rules before posting.

Other useful links: [FAQ](#), [API](#), [Approved Hosts](#), [Requests](#)

Title: Wonder Woman

Type:

Primewire Movie/Show ID:

Quality:

Link:

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

3 Executed on March 11, 2022 at Redondo Beach, California.
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Jan van Voorn