



Mr. Jan van Voorn  
Executive Vice President & Chief of Global  
Content Protection,  
Motion Picture Association, Inc.,  
On Behalf of the Alliance for Creativity and  
Entertainment

15301 Ventura Blvd., Building E  
Sherman Oaks, CA 91403  
Phone: (818) 995-6600  
Email:  
[Jan\\_vanVoorn@motionpictures.org](mailto:Jan_vanVoorn@motionpictures.org)

February 16, 2021

**Via Email**

[legal@cloudflare.com](mailto:legal@cloudflare.com); [abuse+law@cloudflare.com](mailto:abuse+law@cloudflare.com)

Justin Paine, Cloudflare, Inc.  
101 Townsend Street Legal Department  
San Francisco, CA 94107

Re: Oha.to

Dear Mr. Paine:

I am writing on behalf of the Alliance for Creativity and Entertainment ("ACE").

ACE is a global coalition of leading content creators and on-demand entertainment services committed to supporting the legal marketplace for video content and addressing the challenge of online piracy. ACE includes some of the world's largest and most respected motion picture and television rights owners including, among many others, Paramount Pictures Corporation, Sony Pictures Entertainment Inc., Universal City Studios LLC, Walt Disney Studios Motion Pictures, Warner Bros. Entertainment Inc., Amazon Content Services LLC and Netflix Studios, LLC (together, the "ACE Members").

ACE is organized for the purpose of preventing and mitigating online theft of copyrighted films and television programs, and undertakes initiatives to identify and take action against piracy threats to create an online environment in which copyrighted film and television content is more secure and online content theft can be addressed more effectively and efficiently.

The ACE Members, whether themselves or through subsidiaries and affiliates, own or are the exclusive licensees of copyrights in a vast library of motion pictures and television programs (the "Copyrighted Works").

We have determined that individuals operating and controlling Oha.to have infringed ACE Members' Copyrighted Works by using Cloudflare servers, networks, and other services, to connect end users of the "Watched" mobile application to websites containing infringing content. The Oha.to service receives





requests for infringing content from the Watched application, scrapes various links to identify cyberlockers containing the requested infringing content, and returns a response containing the scraped links to the application, which allows users of the Watched application to stream infringing content.

For example, Oha.to facilitates access to infringing content available through the below-referenced Websites:

Infringed Title	Oha.to Link	Cyberlocker Link
<b>Bloodshot</b>	<a href="https://www.oha.to/oha-vod-5/source/watched">Oha.to/oha-vod-5/source/watched</a>	<a href="https://vivo.sx/62555dcecd">https://vivo.sx/62555dcecd</a> <a href="https://vivo.sx/f7f9446158">https://vivo.sx/f7f9446158</a> <a href="https://clipwatching.com/qkhmrtjkwp2q/Bloodshot.2020.x264-Bluray-1080p.AAC-5.1-RARBG_tt1634106.mp4.html">https://clipwatching.com/qkhmrtjkwp2q/Bloodshot.2020.x264-Bluray-1080p.AAC-5.1-RARBG_tt1634106.mp4.html</a> <a href="https://clipwatching.com/qyk1n9v3s4pw/Bloodshot.2020.h264-WEBDL-480p.AAC-2.0-NTG_tt1634106.mkv.html">https://clipwatching.com/qyk1n9v3s4pw/Bloodshot.2020.h264-WEBDL-480p.AAC-2.0-NTG_tt1634106.mkv.html</a>
<b>It Chapter Two</b>	<a href="https://www.oha.to/oha-vod-2/source/watched">Oha.to/oha-vod-2/source/watched</a>	<a href="https://vivo.sx/745eb9d09f">https://vivo.sx/745eb9d09f</a> <a href="https://vivo.sx/72a39ee1cd">https://vivo.sx/72a39ee1cd</a> <a href="https://vidoza.net/2jgj3338f7gw.html">https://vidoza.net/2jgj3338f7gw.html</a> <a href="https://vidoza.net/9buvkgw1755p.html">https://vidoza.net/9buvkgw1755p.html</a>

Enclosed is a subpoena compliant with the Digital Millennium Copyright Act. The subpoena requires that you provide information concerning the individuals behind the Oha.to service who are facilitating access to infringing material described in this notice. As is stated in the attached subpoena, you are required to disclose to the Motion Picture Association, Inc. (on behalf of the ACE Members) information sufficient to identify the infringers associated with Oha.to. This would include the individuals' names, physical addresses, IP addresses, telephone numbers, e-mail addresses, payment information, account updates and account history.

We are providing this notice based on our good faith belief that the use of motion pictures and television programs owned by the ACE Members in the manner occurring via the websites identified below is not authorized by the copyright owners, their agents, or the law. The information in this notification is accurate and, under penalty of perjury, we are authorized to act on behalf of the ACE Members, which own or control exclusive rights under copyright that are being infringed in the manner described herein. This letter is without prejudice to the rights and remedies of the ACE Members, including to recover damages and any other claims for relief, all of which are expressly reserved.

If you have any questions, please contact me at (818) 995-6600, or via email at Jan\_vanVoorn@motionpictures.org.





[www.alliance4creativity.com](http://www.alliance4creativity.com)

Very truly yours,

A handwritten signature in black ink, appearing to read "Jan van Voorn". The signature is written over a horizontal line.

Jan van Voorn

Enclosure

