

1 MARI T. SAIGAL (State Bar No. 318556)
Mari.Saigal@mto.com
2 MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue
3 Fiftieth Floor
Los Angeles, California 90071-3426
4 Telephone: (213) 683-9100
Facsimile: (213) 687-3702

5 Attorneys for Motion Picture Association, Inc.
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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.

Case Number: 2:21-mc-00140

**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:

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22 1. I am Executive Vice President and Chief of Global Content Protection
23 for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on
24 behalf of Columbia Pictures Industries, Inc. and Warner Bros. Entertainment Inc.
25 (“ACE Members”), each of which is a member of the Alliance for Creativity and
26 Entertainment (“ACE”). ACE is a global coalition of leading content creators and
27 on-demand entertainment services committed to supporting the legal marketplace
28 for video content and addressing the challenge of online piracy. The ACE

1 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 Oha.to website and service. Oha.to
 8 utilizes Cloudflare servers to facilitate access to infringing content by connecting
 9 users of the “Watched” mobile application to cyberlockers containing infringing
 10 content. For example, Oha.to has facilitated access to infringing content located on
 11 the following websites:

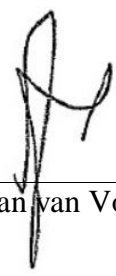
Infringed Title	Oha.to Link	Cyberlocker Link
Bloodshot	Oha.to/oha-vod-5/source.watched	https://vivo.sx/62555dcecd https://vivo.sx/f7f9446158 https://clipwatching.com/qkhmrtjkwp2q/Bloodshot.2020.x264-Bluray-1080p.AAC-5.1-RARBG_tt1634106.mp4.html https://clipwatching.com/qyk1n9v3s4pw/Bloodshot.2020.h264-WEBDL-480p.AAC-2.0-NTG_tt1634106.mkv.html
It Chapter Two	Oha.to/oha-vod-2/source.watched	https://vivo.sx/745eb9d09f https://vivo.sx/72a39ee1cd https://vidoza.net/2jgj3338f7gw.html https://vidoza.net/9buvkqwl755p.html

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

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

Executed at Redondo Beach, California, on February 16, 2021.



Jan van Voorn