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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-00592

**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., Paramount Pictures Corp., Universal
25 City Studios Productions LLLP, and Warner Bros. Entertainment, Inc. (“ACE
26 Members”), each of which is a member of the Alliance for Creativity and
27 Entertainment (“ACE”). ACE is a global coalition of leading content creators and
28 on-demand entertainment services committed to supporting the legal marketplace

1 for video content and addressing the challenge of online piracy. The ACE
2 Members, whether themselves or through subsidiaries and affiliates, own the
3 copyrights in the below referenced copyrighted works.

4 2. The ACE Members (via the Motion Picture Association, Inc.) are
5 requesting issuance of the attached proposed subpoena that would order Cloudflare,
6 Inc. to disclose the identities, including names, physical addresses, IP addresses,
7 telephone numbers, e-mail addresses, payment information, account updates and
8 account histories of the users operating the websites listed in the attached **Exhibit A**.

9 3. The purpose for which this subpoena is sought is to obtain the identities
10 of the individuals assigned to these websites who have exploited ACE Members'
11 exclusive rights in their copyrighted motion pictures without their authorization.
12 This information will only be used for the purposes of protecting the rights granted
13 to ACE Members, the motion picture copyright owners, under Title II of the Digital
14 Millennium Copyright Act.

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

19 Executed at San Diego, California, on April 9, 2021.

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Jan van Voorn

EXHIBIT A

Website	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
lookmovie.io	Almost Christmas	https://lookmovie.io/movies/view/almost-christmas-2016	Fifty Shades Darker	https://lookmovie.io/movies/view/fifty-shades-darker-2017
watchmovie.movie	47 Ronin	https://watchmovie.movie/series/47-ronin-hti-episode-1	Whiskey Tango Foxtrot	https://watchmovie.movie/series/whiskey-tango-foxtrot-mtd-episode-1
yesmovies.ag	Varsity Blues	https://yesmovies.ag/movie/varsity-blues-8030/1-1/watching.html	The Other Guys	https://yesmovies.ag/movie/the-other-guys-5301/1-1/watching.html
himovies.to	Forrest Gump	https://himovies.to/watch-movie/forrest-gump-19710.2507831	Locked Down	https://himovies.to/watch-movie/locked-down-67265.4030906
afdah.info	Flashdance	https://afdah.info/watch-movies/31549-flashdance-1983	Birds of Prey: And the Fantabulous Emancipation of One Harley Quinn	https://afdah.info/watch-movies/68010-birds-of-prey-and-the-fantabulous-emancipation-of-one-harley-quinn-2020