MARI T. SAIGAL (State Bar No. 318556) Mari.Saigal@mto.com MUNGER, TOLLES & OLSON LLP 350 South Grand Avenue Fiftieth Floor Los Angeles, California 90071-3426 Telephone: (213) 683-9100 Facsimile: (213) 687-3702 5 Attorneys for Motion Picture Association, Inc. 6 7 8 9 UNITED STATES DISTRICT COURT 10 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION 11 Case Number: 2:21-mc-00592 In Re 17 U.S.C. § 512(h) Subpoena to 12 CLOUDFLARE, INC. 13 DECLARATION OF JAN VAN VOORN IN SUPPORT OF ISSUANCE OF SUBPOENA 14 **PURSUANT TO 17 U.S.C. § 512(h)** 15 16 17 18 19 20 I, Jan van Voorn, the undersigned, declare that: 21 I am Executive Vice President and Chief of Global Content Protection 1. 22 for the Motion Picture Association, Inc. ("MPA"). I submit this declaration on 23 behalf of Columbia Pictures Industries, Inc., Paramount Pictures Corp., Universal 24 City Studios Productions LLLP, and Warner Bros. Entertainment, Inc. ("ACE 25 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

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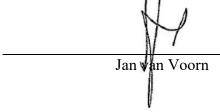
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for video content and addressing the challenge of online piracy. The ACE Members, whether themselves or through subsidiaries and affiliates, own the copyrights in the below referenced copyrighted works.

- 2. The ACE Members (via the Motion Picture Association, Inc.) are requesting issuance of the attached proposed subpoena that would order Cloudflare, Inc. to disclose the identities, including names, physical addresses, IP addresses, telephone numbers, e-mail addresses, payment information, account updates and account histories of the users operating the websites listed in the attached **Exhibit A**.
- 3. The purpose for which this subpoena is sought is to obtain the identities of the individuals assigned to these websites who have exploited ACE Members' exclusive rights in their copyrighted motion pictures without their authorization. This information will only be used for the purposes of protecting the rights granted to ACE Members, the motion picture copyright owners, under Title II of the Digital Millennium Copyright Act.

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 San Diego, California, on April 9, 2021.



## **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/varsi ty-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