



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

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August 13, 2021

VIA EMAIL

legal@cloudflare.com; abuse+law@cloudflare.com

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

Re: Notice of Infringement Regarding Certain Cloudflare Users

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 users of your system or network have infringed certain ACE Members' Copyrighted Works referenced in the attached **Exhibit A**.





Enclosed is a subpoena compliant with the Digital Millennium Copyright Act. The subpoena requires that you provide information concerning the individuals offering infringing material described in the attached 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. 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.

Very truly yours,



Jan van Voorn

Attachment and Enclosure



EXHIBIT A

Website	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
Watchseries.ninja	Mortal Kombat	https://www4.watchseries.ninja/mortal-kombat-2021/	Godzilla vs. Kong	https://www4.watchseries.ninja/godzilla-vs-kong-2021/
pelisplus.movie	Tenet	https://www13.pelisplus.movie/pelicula/tenet	Spiderman: Into the Spider-verse	https://www13.pelisplus.movie/pelicula/spiderman-un-nuevo-universo
Reboot.tube	The Big Bang Theory Season 1 Episode 3	https://reboot.tube/s/bigbang	Breaking Bad Season 4 Episode 6	https://reboot.tube/s/bad
olevod.com	Fast & Furious 9	https://www.olevod.com/index.php/vod/detail/id/27132.html	Godzilla vs Kong	https://www.olevod.com/index.php/vod/detail/id/25852.html
duboku.fun	Zack Snyder's Justice League	https://e.duboku.fun/voddetail/1985.html	Bad Boys for Life	https://e.duboku.fun/voddetail/1295.html
dandanzan.com	Fast & Furious 9	https://www.dandanzan.com/dianying/78772.html	Godzilla vs Kong	https://www.dandanzan.com/dianying/82184.html
shancaowu.com	Fast & Furious 9	https://www.shancaowu.com/voddetail/429083.html	Outside the Wire	https://www.shancaowu.com/voddetail/411369.html
kissasian.li	Kingdom Season 2	https://kissasian.li/Drama/Kingdom-Season-2	Kung Fu Hustle	https://kissasian.li/Drama/Kung-Fu-Hustle
eztv.re	The Romanoffs Season 1 Episode 1	https://eztv.re/ep/1294648/the-romanoffs-s01e01-web-h264-convoy/	Grey's Anatomy	https://eztv.re/ep/1494097/greys-anatomy-s07e11-hdtv-xvid-lol/
megadede.la	Joker	https://www.megadede.la/3587-joker.html	Dolittle	https://www.megadede.la/3076-las-aventuras-del-doctor-dolittle.html
Megadede.se	Joker	https://www.megadede.se/pelicula/joker-2019-crimen/	Dolittle	https://www.megadede.se/pelicula/las-aventuras-del-doctor-dolittle-2020-comedia/
repelis24.info	Joker	https://www.repelis24.info/21505/pelicula/joker.html	Wonder Woman	https://www.repelis24.info/10287/pelicula/mujer-maravilla-wonder-woman.html
pelispe.com	Wonder Woman 1984	https://www.pelispe.com/pelicula/15402/wonder-woman-1984.html	Frozen II	https://www.pelispe.com/pelicula/11353/frozen-2.html
pelismegahd.pe	Godzilla vs Kong	https://www.pelismegahd.pe/2021/06/godzilla-vs-kong-2021-bdremux-2160p-dolby-vision-mkv-espanol-latino/	Mortal Kombat	https://www.pelismegahd.pe/2021/04/mortal-kombat-2021-amzn-web-dl-1080p-hd-mkv-espanol-latino/
Series24.co	Brooklyn Nine-Nine	https://www.series24.co/serie/brooklyn-nine-nine/	Grey's Anatomy	https://www.series24.co/serie/anatomia-de-grey/

Website	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
gofilmes.me	Mortal Kombat	https://gofilmes.me/mortal-kombat-2021	Godzilla vs Kong	https://gofilmes.me/godzilla-vs-kong
assistirseriados.net	Arrow	http://www.assistirseriados.net/2017/05/27/arrow-todas-temporadas.html	Grey's Anatomy	http://www.assistirseriados.net/2017/06/07/greys-anatomy-todas-temporadas.html
embedforfree.co	Godzilla vs Kong	https://embedforfree.co/imdb?id=tt5034838	Wonder Woman 1984	https://embedforfree.co/imdb?id=tt7126948
cuevana2.io	Wonder Woman 1984	https://cuevana2.io/pelicula/wonder-woman-1984/	Joker	https://cuevana2.io/pelicula/joker/
edvok.com	Wonder Woman 1984	https://edvok.com/wonder-woman-1984-2020	Joker	https://edvok.com/joker-2019
Fanpelis.org	Wonder Woman 1984	https://fanpelis.org/mujer-maravilla-1984/	Tenet	https://fanpelis.org/tenet/
Hackstore.net	Wonder Woman 1984	https://hackstore.net/descargar-mujer-maravilla-1984-2020/	Joker	https://hackstore.net/descargar-guason-2019/
Hdfull.cx	Joker	https://hdfull.cx/pelicula/joker	Wonder Woman 1984	https://hdfull.cx/pelicula/wonder-woman-1984