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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-01072

**DECLARATION OF JAN VAN  
 VOORN IN SUPPORT OF  
 ISSUANCE OF SUBPOENA  
 PURSUANT TO 17 U.S.C. § 512(h)**

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 21 I, Jan van Voorn, the undersigned, declare that:

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 Paramount Pictures Corporation and Universal City Studios Productions  
 25 LLLP (“ACE Members”), each of which is a member of the Alliance for Creativity  
 26 and Entertainment (“ACE”). ACE is a global coalition of leading content creators  
 27 and on-demand entertainment services committed to supporting the legal  
 28 marketplace for video content and addressing the challenge of online piracy. The

1 ACE Members, whether themselves or through subsidiaries and affiliates, own the  
 2 copyrights in the below referenced copyrighted works.

| Infringed Title  | Domain            | Channel Backend Link   |
|------------------|-------------------|--|
| Jack Reacher     | vibetvapp.com     | http://198.255.82.42/live/gkgccajn/7MvvPuzEsnpG/970.ts?token=GUFQAEIOEQMWUQVbCgNdUwJUVQAFAGYDXQhXVgIGUV5WAg5SCAdWAABDSEFKQ0pTUA5sUFUUD1wPAR4VQkYAFD0KXEMLRAsMBFJcQRUVTF9cBhEDAAAGVwwDAQUCDUIEEgpcQwtEAAkBVIBBFRVdTkUGQVdQWmoBXUdbVFIXXwgXD1RNEwldZIAECQJXUxoME1MRFRNfRhUaCxBOX1QXEgcRGCJeC15MWggHAK1eV1hCQ3pXUhQZR1pYRkVWQQBEWEENVgBferUWAgSWVONKTxNZEWxiFBIHXUIGUIGDakMQQJDRRURFRYIFzxLUktCQwZSVFREF18aARAbFVgEHj0AVw9fA1BNXQ4KEBsNGgcTTxFUXIhcEVdDbUdeUUdcQFEOVgheEUQ= |
| Fast & Furious 9 | webplay.tv123.org | https://51-161-87-2.bestserver.online:9092/vod2/zznsuDyEvhlx6IyFA4wObQ/77372/1632883158/53a6a3f6d304b9faa77b62363198eec4.mp4   |

11 2. The ACE Members (via the Motion Picture Association, Inc.) are  
 12 requesting issuance of the attached proposed subpoena that would order Cloudflare,  
 13 Inc. to disclose the identities, including names, physical addresses, IP addresses,  
 14 telephone numbers, e-mail addresses, payment information, account updates and  
 15 account histories of the users operating iptvsubscription.org.

16 3. The purpose for which this subpoena is sought is to obtain the identities  
 17 of the individuals assigned to these websites who have exploited ACE Members’  
 18 exclusive rights in their copyrighted motion pictures without their authorization.  
 19 This information will only be used for the purposes of protecting the rights granted  
 20 to ACE Members, the motion picture copyright owners, under Title II of the Digital  
 21 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 October 1, 2021.



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Jan van Voorn