



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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October 1, 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 exhibit. 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

Domain	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
123movies.london	Tron: Legacy	https://123movies.london/tron-legacy-2010/	Joker	https://123movies.london/joker-2019/
topflix.vc	The Flash	https://topflix.vc/series/assistir-online-the-flash-2014/	House M.D.	https://topflix.vc/series/assistir-online-dr-house/
ymovies.to	Moxie	https://ymovies.to/film/moxie-87517/watching/	Frozen II	https://ymovies.to/film/frozen-ii-83235/watching/
movieboxpro.app	Frozen II	https://www.movieboxpro.app/movie/20528	Spider-Man: Into the Spider-Verse	https://www.movieboxpro.app/movie/12696
pelisplus.so	Godzilla vs Kong	https://pelisplus.so/pelicula/godzilla-vs-kong	Zack Snyder's Justice League	https://pelisplus.so/pelicula/zack-snyders-justice-league
elitetorrent.com	Sonic	https://elitetorrent.com/peliculas/sonic-la-peliculas-latino/	Wonder Woman 1984	https://elitetorrent.com/peliculas/wonder-woman-1984/
gnula.cc	The Flash	https://www.gnula.cc/ver-serie/the-flash-2014/	Super Girl	https://www.gnula.cc/ver-serie/supergirl-2015/
gnula.link	Soul	https://www.gnula.link/ver-pelicula-online/soul-2020/	Wonder Woman 1984	https://www.gnula.link/ver-pelicula-online/wonder-woman-1984-2020/
Emovies.io	Frozen II	https://emovies.io/watch-frozen-ii-2019-1080p.84380-hd-online-free/watching.html	Men in Black International	https://emovies.io/watch-men-in-black-international-2019-1080p.93119-hd-online-free/watching.html
Watchtvseries.si	Marvelous Mrs. Maisel S1 E1	https://watchtvseries.si/the-marvelous-mrs-maisel-season-1-episode-1/	Looking for Alaska Season 1 Episode 3	https://watchtvseries.si/looking-for-alaska-season-1-episode-3/
Mrpiracy.top	Beautiful Boy	https://mrpiracy.top/filme.php?imdb=tt1226837	Frozen II	https://mrpiracy.top/filme.php?imdb=tt4520988pt
Waklov.com	Beautiful Boy	http://waklov.com/xl3k3rw/b/waklov/51684750	Triple Frontier	http://waklov.com/xl3k3rw/b/waklov/58266000
Bambip.com	Beautiful Boy	http://bambip.com/oiltg9izi4mu/b/bambip/80345490	Triple Frontier	http://bambip.com/oiltg9izi4mu/b/bambip/90576240
Fandefilm.com	Dolittle	http://www.fandefilm.com/le-voyage-du-dr-dolittle-streaming/	Joker	http://www.fandefilm.com/joker-streaming/
jogiiasd.xyz	Fast & Furious Presents: Hobbs & Shaw	https://www.jogiiasd.xyz/movies/10468.mp4/index.m3u8?md5=kLD53rPPsJiYRC1BMhS-HA&expires=1628617652	Joker	https://www.jogiiasd.xyz/movies/23224.mp4/index.m3u8?md5=Cqh8cKNGF8fwV-NjcLNLrg&expires=1628618732
pornoman.cc	Grey's Anatomy Season 7 Episode 11	https://pornoman.cc/series/200/3616.mp4/index.m3u8	Arrow Season 6 Episode 1	https://pornoman.cc/series/507/11179.mp4/index.m3u8

Domain	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
yggtorrent.li	Dolittle	https://yggtorrent.li/torrent/filmvid%C3%A9o/film/594610-dolittle+2020+2160p+bluray+hevc+truehd+7+1+atmos-eatdik	BeautifulBoy	https://yggtorrent.li/torrent/filmvid%C3%A9o/film/526177-beautiful+boy+2018+french+brrip+xvid+ac3-notag
yggtorrent.si	Dolittle	https://yggtorrent.si/torrent/filmvid%C3%A9o/film/594610-dolittle+2020+2160p+bluray+hevc+truehd+7+1+atmos-eatdik	BeautifulBoy	https://yggtorrent.si/torrent/filmvid%C3%A9o/film/526177-beautiful+boy+2018+french+brrip+xvid+ac3-notag
yggtorrent.nz	Dolittle	https://www3.yggtorrent.nz/torrent/filmvid%C3%A9o/film/594610-dolittle+2020+2160p+bluray+hevc+truehd+7+1+atmos-eatdik	BeautifulBoy	https://www3.yggtorrent.nz/torrent/filmvid%C3%A9o/film/526177-beautiful+boy+2018+french+brrip+xvid+ac3-notag
kinomax.to	The Lion King	https://kinomax.to/6778-der-konig-der-lowen-2019.html	Triple Frontier	https://kinomax.to/13030-triple-frontier-2019.html
pelisplushd.net	The Marvelous Mrs. Maisel S1E1	https://pelisplushd.net/serie/la-maravillosa-sra-maisel/temporada/1/capitulo/1	Black Box	https://pelisplushd.net/pelicula/cajas-oscuras
Sports24.stream	Major League Baseball – Washington Nationals v Colorado Rockies	https://sports24.stream/mlb/632310/1c3bc06f-bfee-4a92-8e63-30fed6384ec9/1.html	National Football League - Jacksonville Jaguars v Cincinnati Bengals	https://sports24.stream/nfl/jaguars-at-bengals/nfln.html