



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

15301 Ventura Blvd., Building E
Sherman Oaks, CA 91403
Phone: (818) 995-6600
Email:
Jan_vanVoorn@motionpictures.org

November 10, 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 via the below-referenced Websites:





Infringed Title	Domain	Channel Backend Link
A Serious Man	lptvsubscription.tv	http://212.8.243.86/VOD3/newmovies4-8-19/A.Serious.Man.2009.1080p.BluRay.x264-YTS.AM.mp4/mono.m3u8
Bird Box	lptvsubscription.tv	http://212.8.243.86/VOD3/newmovies4444/bird.box.2018.internal.1080p.web.x264-strife.mp4/mono.m3u8
Tenet	Webestreams.com	http://secure.xyzvideo.net/8eiBDod2nA1oXd4XZgQgaA==,1608064820/hls/Tenet.2020.1080p.HDRip.x264.AAC2.0-SHITBOX.mp4/master.m3u8
Over The Moon	Webestreams.com	http://secure.xyzvideo.net/lIP-2D4EbWDE5ByZejMEnw==,1608065155/hls/Over.the.Moon.2020.1080p.WEBRip.x264-RARBG.mp4/master.m3u8

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





www.alliance4creativity.com

A handwritten signature in black ink, appearing to read "Jan van Voorn". The signature is written over a horizontal line.

Jan van Voorn



1 ROSE LEDA EHLER (State Bar No. 296523)
 Rose.Ehler@mtto.com
 2 MUNGER, TOLLES & OLSON LLP
 350 South Grand Avenue
 3 Fiftieth Floor
 Los Angeles, California 90071-3426
 4 Telephone: (213) 683-9100
 Facsimile: (213) 687-3702
 5 Attorneys for Motion Picture Association, Inc.

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 9 **UNITED STATES DISTRICT COURT**
 10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
 11

12 In Re 17 U.S.C. § 512(h) Subpoena to
 13 CLOUDFLARE, INC.

Case Number: 2:21-mc-01095

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

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

Infringed Title	Domain	Channel Backend Link
A Serious Man	iptvsubscription.tv	http://212.8.243.86/VOD3/newmovies4-8-19/A.Serious.Man.2009.1080p.BluRay.x264-YTS.AM.mp4/mono.m3u8
Bird Box	iptvsubscription.tv	http://212.8.243.86/VOD3/newmovies4444/bird.box.2018.internal.1080p.web.x264-strife.mp4/mono.m3u8
Tenet	Webestreams.com	http://secure.xyzvideo.net/8eiBDod2nA1oXd4XZgQgaA==,1608064820/hls/Tenet.2020.1080p.HDRip.x264.AAC2.0-SHITBOX.mp4/master.m3u8
Over The Moon	Webestreams.com	http://secure.xyzvideo.net/lIP-2D4EbWDE5ByZejMEnw==,1608065155/hls/Over.the.Moon.2020.1080p.WEBRip.x264-RARBG.mp4/master.m3u8


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

19 3. The purpose for which this subpoena is sought is to obtain the identities
20 of the individuals assigned to these websites who have exploited ACE Members'
21 exclusive rights in their copyrighted motion pictures without their authorization.
22 This information will only be used for the purposes of protecting the rights granted
23 to ACE Members, the motion picture copyright owners, under Title II of the Digital
24 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 November 10, 2021.



Jan van Voorn