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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-01096

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

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

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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 Amazon Content Services LLC; Disney Enterprises, Inc.; Netflix, Inc.;
25 Netflix Worldwide Entertainment, LLC; Paramount Pictures Corporation; Sony
26 Pictures Television, Inc.; Universal Cable Productions LLC; Universal City Studios
27 Productions LLLP; and Warner Bros. Entertainment, Inc. (“ACE Members”), each
28 of which is a member of the Alliance for Creativity and Entertainment (“ACE”).

1 ACE is a global coalition of leading content creators and on-demand entertainment
2 services committed to supporting the legal marketplace for video content and
3 addressing the challenge of online piracy. The ACE Members, whether themselves
4 or through subsidiaries and affiliates, own the copyrights in the below referenced
5 copyrighted works.

6 2. The ACE Members (via the Motion Picture Association, Inc.) are
7 requesting issuance of the attached proposed subpoena that would order Cloudflare,
8 Inc. to disclose the identities, including names, physical addresses, IP addresses,
9 telephone numbers, e-mail addresses, payment information, account updates and
10 account histories of the users operating the websites listed in the attached **Exhibit A**.

11 3. The purpose for which this subpoena is sought is to obtain the identities
12 of the individuals assigned to these websites who have exploited ACE Members'
13 exclusive rights in their copyrighted motion pictures without their authorization.
14 This information will only be used for the purposes of protecting the rights granted
15 to ACE Members, the motion picture copyright owners, under Title II of the Digital
16 Millennium Copyright Act.

17
18 I declare under penalty of perjury under the laws of the United States of
19 America that the foregoing is true and correct to the best of my knowledge,
20 information or belief.

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22 Executed at Redondo Beach, California, on November 10, 2021.

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25 _____
26 Jan van Voorn
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EXHIBIT A

Domain	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
primewire.ag	Raya and the Last Dragon	https://primewire.ag/movie/176344-watch-raya-and-the-last-dragon	Godzilla vs Kong	https://primewire.ag/movie/61407-watch-godzilla-vs-kong
obniv.com	Triple Frontier	http://obniv.com/ws4xct8/b/obniv/121419040	Always Be My Maybe	http://obniv.com/ws4xct8/b/obniv/489516220
hd-world.cc	Dolittle	https://hd-world.cc/filme/die-fantastische-reise-des-dr-dolittle-2020-german-dl-1080p-bluray-x264-details/	Frozen II	https://hd-world.cc/filme/die-eiskoenigin-2-frozen-ii-2019-3d-multi-complete-bluray-sharphd/
freefilm.to	Dolittle	https://freefilm.to/film/dolittle	Frozen II	https://freefilm.to/film/ladove-kralovstvo-2
freeserial.to	Breaking Bad S03E01	https://freeserial.to/serial/breaking-bad/uz-ne/2480	Grey's Anatomy S14 E01	https://www.freeserial.to/serial/greys-anatomy/break-down-the-house/29628
pelis-online.net	Mortal Kombat	https://pelis-online.net/accin/24100-mortal-kombat.html	Godzilla vs Kong	https://pelis-online.net/accin/24105-godzilla-vs-kong.html
ifsp.tv	Tenet	https://ifsp.tv/play?id=325zVhAoZpR	Frozen II	https://ifsp.tv/play?id=sKf4QKkshK8
7movierulz.vc	Godzilla vs Kong	https://7movierulz.vc/godzilla-vs-kong-2021-brrip-original-telugu-tamil-hindi-eng-dubbed-movie-watch-online-free/	Raya and the Last Dragon	https://7movierulz.lv/raya-and-the-last-dragon-2021-brrip-original-telugu-tamil-hindi-eng-dubbed-movie-watch-online-free/
extramovies.cam p	Godzilla vs Kong	https://extramovies.camp/godzilla-vs-kong-2021-dual-audio-hindi-1080p-hq-bluray/	Frozen II	https://extramovies.camp/frozen-2-2019-dual-audio-hindi-english-1080p-bluray-esubs-download/
nox.to	The Lion King	https://nox.to/download/Filme/der-k_nig-der-l_wen-_2019_-BJL6yph4r	Triple Frontier	https://nox.to/download/Filme/triple-frontier-B1hc538w4
sendfox.org	Law and Order Special Victims Unit S17E01	https://sendfox.org/scrlsy5e3onq	Breaking Bad S03E01	https://sendfox.org/avaduh6cup5q
Ogladaj.to	Dolittle	https://ogladaj.to/zaloguj?ref=/doktor-dolittle-dolittle-2020ckdfweh9qy.html	Joker	https://ogladaj.to/zaloguj?ref=/joker-2019.html
94itv.app	Fast & Furious 9	https://94itv.app/vod-detail-id-126235.html	Godzilla vs Kong	https://94itv.app/vod-detail-id-66129.html
imybinoo.net	Godzilla vs Kong	https://s5.imybinoo.net/movies/%ea%b3%a0%ec%a7%88%eb%9d%bc-vs-%ec%bd%a9/	Frozen II	https://s6.imybinoo.net/movies/%ea%b2%a8%ec%9a%b8%ec%99%95%ea%b5%ad-2/
Supervideo.tv	Frozen II	https://supervideo.tv/kgtdhc6qx7vm	Joker	https://supervideo.tv/qa5jpcifkgv
extrabb.com	Triple Frontier	http://extrabb.com/0a6d1wvcskdfym/b/extrabb/75668112	Always Be My Maybe	http://extrabb.com/0a6d1wvcskdfym/b/extrabb/305065566

Domain	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
wavob.com	Triple Frontier	http://wavob.com/p6juyvbu4/b/wavob/1026544	Always Be My Maybe	http://wavob.com/p6juyvbu4/b/wavob/4138642
vagdi.com	Triple Frontier	http://vagdi.com/eg4a7qc56o/b/vagdi/121437632	Always Be My Maybe	http://vagdi.com/eg4a7qc56o/b/vagdi/489591176
bovmi.com	Triple Frontier	http://bovmi.com/uqj22woav/b/bovmi/106586608	Always Be My Maybe	http://bovmi.com/uqj22woav/b/bovmi/429717394
egy.best	Frozen II	https://egy.best/movie/frozen-ii-2019/#download	Dolittle	https://egy.best/movie/dolittle-2020/?ref=search-p1#download
kissasian.sh	Kingdom (Season 2)	https://kissasian.sh/Drama/Kingdom-Season-2		
kisstvshow.to	Busted! S1 E1	https://kisstvshow.to/Show/Busted/Episode-1	Busted! S1 E2	https://kisstvshow.to/Show/Busted/Episode-2
Phimmoizz.net	The Lion King	http://phimmoizz.net/phim/vua-su-tu-i0-8162/	Harry Potter and the Deathly Hallows Part II	http://phimmoizz.net/phim/harry-potter-va-bao-boi-tu-than-phan-2-i1-1878/xem-phim.html
unblockit.app	Frozen II	https://1337x.unblockit.app/torrent/4292403/Frozen-II-2019-1080p-WEBRip-5-1-YTS-YIFY/	Dolittle	https://1337x.unblockit.app/torrent/4370286/Dolittle-2020-1080p-WEBRip-5-1-YTS-YIFY/
vod.phimmoicdn.net	Tenet	http://vod.phimmoicdn.net/v1.0/st02/904d63c6036cf4de550b21769b592f1c/L3qk-yxj6A5HU4zVSasy6g/2/8/b/ee/5b8/b008acdaa686505d2e92942f5b8eeb82/hls-h264-480p/playlist.m3u8	Wonder Woman 1984	http://vod.phimmoicdn.net/v1.0/st04/3f78c49b7a8197b861df6c106f4d43d9/vSgsl3ThQ_ZSplmVhpfh9g/8/e/0/07/73b/80b41b7eb514f4a0fde4166273b070e8/hls-h264-480p/playlist.m3u8