

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.
 6
 7
 8

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 TONIC DOMAINS CORPORATION.

Case Number: 2:21-mc-01097

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

14
 15
 16
 17
 18
 19
 20
 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 Warner Bros. Entertainment Inc.
 25 (“ACE Members”), each of which is a member of the Alliance for Creativity and
 26 Entertainment (“ACE”). ACE is a global coalition of leading content creators and
 27 on-demand entertainment services committed to supporting the legal marketplace
 28 for video content and addressing the challenge of online piracy. The ACE

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

Infringed Title	Domain	Channel Backend Link
Joker	watchhd.to	http://159.69.73.164/vauth/Uq6cQ0_1jQK94B7a7tsY23bOTnmmf7e - CHcmldSXg5a8nDq9oBn3e5Nm3YIFL9G3v ur8cR wRsFQwXNu7awapURGbt8Z3ZpZ5nEnSxQgKq8g0F sOVnr-btfwDtwqNN_pQkz1QMqz-mxKmlSSu8byCs11RsGwcaQmgh8HcgY0MgTTx0o0 bKmvXEz572WUMUcHDuuN2hnHPvaZosP43my-QHzKP_EFIpiKdIcDqMiM42zpmser_Y9HfFGBjQXw OHRJ74GcDoFy9zkKlgPI2JgaN0PksGgTO4sywZ5Q9 Cp8hs9u_1RWO8x_oIsg64BDphzsKnun_3EQp4gbE7 SRmAECFKangtVSSRkkUEn8uueCJ0Yp4ne45r_bzt6 OO227IkWrNMqJvTmdbMK0QpfXl-auFzE0vBwFfeQ4JQztyI0bBmQhR1O4IgpKx1XtPLcf 9PSfmgg5RIPsgrANudhvSLDdckIsAW4xcQgTSK8k3 mRcRk-f-cf8LcEVZMjV-tszdtVykTqg7r7b9V7KxRQbsruxgxIVYxEeUmL0q69 D5BOI6PERLaBk57LRyRgWXM5fv4vcA1llarA-904-9BI1b6XA
A Quiet Place 2	watchhd.to	http://159.69.73.164/vauth/YgKIVFZ-leeVDk-o0PTXdeZxtEzkAusDUStGqe9OOYE0YdsUh5-kzWMuEmYPIAw00KT3AUs_Co4CfElvS4pCD7CKoP9fdy_wEY-TaiZUvjkcRSFP7uex_jmwDqWHX2nQ7g-GkN1meTg2xMGIZoEMDZ0f2FEbHjd35EYz-NGyeaPPTLadtgFY-8JCbkR9L1kEvGj_fhlq5U7Qw_zGskMVbce0ZuMra07uSeWIJSgcX0w4hVT0NeO2twp32N5TXcjdDqWOFB-g4XBAIWXK_nUNT3g3r-cvax_RYofM9qBRXRrnem_oe2XkpYd0ITLz9rFbRV4gww3bzNj5bbjOqJQOMZ6c1tNMGKJy1C7wP7wM2w5Hy4NuZUrHaG2fq0S3tD_YotkcahyH45TPevCmbSPAufgml65NIJ3zXFJBCCdb8ecsP08q0W08F73fwWFySjscr0NyPFmqk8N9JSUO1IZLSfVgOB69EbS3JxOVxG-euoPvikwDfMWLmFehGgeGNDm6op2nSkhugewOoj6jjloySUD4sVOpjNYQWNx4RkKvtaEOb6TcMh5G-AriEJ_tZNxHIxBNringaSA5nHvVHnlUO

23
 24 2. The ACE Members (via the Motion Picture Association, Inc.) are
 25 requesting issuance of the attached proposed subpoena that would order Tonic
 26 Domains Corporation to disclose the identities, including names, physical addresses,
 27 IP addresses, telephone numbers, e-mail addresses, payment information, account
 28 updates and account histories of the users operating watchhd.to.

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

7
8 I declare under penalty of perjury under the laws of the United States of
9 America that the foregoing is true and correct to the best of my knowledge,
10 information or belief.

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

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


Jan van Voorn