



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
Tonic Domains Corporation
140 Jamaica St.
Tiburon, CA 94920
Hostmaster@tonic.to

Re: Notice of Infringement Regarding Certain Tonic Users

To whom it may concern:

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:





www.alliance4creativity.com

<p>Joker</p>	<p>https://www.oha.to/oha-vod-5/source.watched</p>	<p>https://vivo.sx/c0ddef4a6a https://vivo.sx/392608da63 https://vidoza.net/r62rnomjy0f0.html https://clipboard.cc/g/6hcOylWxmRYf https://clipboard.cc/g/6FSRSYt2gnk9 https://clipboard.cc/g/m5Lhy5rO4NtD https://clipboard.cc/g/fFtIWlbDRN0K</p>
<p>A Quiet Place Part II</p>	<p>https://www.oha.to/oha2-vod-5/source.watched</p>	<p>https://vivo.st/76036f039e https://vivo.st/8e8908c142 https://vivo.st/2c878a05b5 https://vivo.st/68839bb411 https://vivo.st/f687ecb7bd https://vivo.st/195b507b07 https://voe.sx/e/z6flpdxfrein https://voe.sx/e/3kjvbwq8na66 https://voe.sx/e/a4j47l2gr982 https://voe.sx/e/vwr54cfj2ppn https://voe.sx/e/w3stpbhpi9na https://voe.sx/e/zmdld6vafkmo https://streamtape.com/e/gga2ZvzXB4fq1de https://streamtape.com/e/9bAMjeXrAOHaz71 https://streamtape.com/e/lxwP62O4vQF7Ko6 https://streamtape.com/e/BYVKle0PM0Tyqva</p>

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,



Jan van Voorn



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350 South Grand Avenue
3 Fiftieth Floor
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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 TONIC DOMAINS CORPORATION.

Case Number: 2:21-mc-01098

**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 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.

<p>3 4 5 Joker</p>	<p>https://www.oha.to/oha-vod-5/source.watched</p>	<p>https://vivo.sx/c0ddef4a6a https://vivo.sx/392608da63 https://vidoza.net/r62rnomjy0f0.html https://clipboard.cc/g/6hcOylWxmRYF https://clipboard.cc/g/6FSRSYt2gnk9 https://clipboard.cc/g/m5Lhy5rO4NtD https://clipboard.cc/g/fFtIWlBDRN0K</p>
<p>8 9 10 11 12 A Quiet Place 13 Part II</p>	<p>https://www.oha.to/oha2-vod-5/source.watched</p>	<p>https://vivo.st/76036f039e https://vivo.st/8e8908c142 https://vivo.st/2c878a05b5 https://vivo.st/68839bb411 https://vivo.st/f687ecb7bd https://vivo.st/195b507b07 https://voe.sx/e/z6flpdxfrein https://voe.sx/e/3kjbvq8na66 https://voe.sx/e/a4j47l2gr982 https://voe.sx/e/vwr54cfj2ppn https://voe.sx/e/w3stpbhbj9na https://voe.sx/e/zmdld6vafkmo https://streamtape.com/e/gga2ZvzXB4fq1de https://streamtape.com/e/9bAMjeXrAOHaz71 https://streamtape.com/e/lxwP62O4vQF7Ko6 https://streamtape.com/e/BYVKle0PM0Tyqva</p>

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

24 3. The purpose for which this subpoena is sought is to obtain the identities
 25 of the individuals assigned to these websites who have exploited ACE Members’
 26 exclusive rights in their copyrighted motion pictures without their authorization.
 27 This information will only be used for the purposes of protecting the rights granted
 28

1 to ACE Members, the motion picture copyright owners, under Title II of the Digital
2 Millennium Copyright Act.

3
4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct to the best of my knowledge,
6 information or belief.

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

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Jan van Voorn

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6 Attorneys for Motion Picture Association, Inc.

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9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION

11 In Re 17 U.S.C. §512(h) Subpoena to
12
13 TONIC DOMAINS CORPORATION.

Case Number: 2:21-mc-01098

**REQUEST TO THE CLERK FOR
ISSUANCE OF SUBPOENA
PURSUANT TO 17 U.S.C. § 512(h)**

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1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT the Motion Picture Association, Inc.
3 through undersigned counsel and its authorized representatives, hereby requests that
4 the Clerk of this Court, pursuant to the Digital Millennium Copyright Act
5 (“DMCA”), 17 U.S.C. § 512(h), issue the attached proposed subpoena to Tonic
6 Domains Corporation. to identify alleged infringers, as set forth in the attached
7 notice and declaration of Jan van Voorn.

8
9 DATED: November 10, 2021

MUNGER, TOLLES & OLSON LLP

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11 By: /s/ Rose Leda Ehler
12 ROSE LEDA EHLER

13 Attorney for Motion Picture Association,
14 Inc.

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