



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 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 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,

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

Jan van Voorn



EXHIBIT A

Website	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
moviesjoy.to	Moxie	https://moviesjoy.to/watch-movie/moxie-68284.4111691	Primal Fear	https://moviesjoy.to/watch-movie/primal-fear-17814.2519167
rarbg.to	Frozen II	https://rarbg.to/torrent/jdukq2l	Beautiful Boy	https://rarbg.to/torrent/z2toxrd
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
yesmovies.to	Dolittle	https://yesmovies.to/movie/dolittle-100331.html	Beautiful Boy	https://yesmovies.to/movie/beautiful-boy-27433.html
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
ymovies.to	Moxie	https://ymovies.to/film/moxie-87517/watching/	Frozen II	https://ymovies.to/film/frozen-ii-83235/watching/
kisstvshow.to	Busted!: S1 E1	https://kisstvshow.to/Show/Busted/Episode-1	Busted!: S1 E2	https://kisstvshow.to/Show/Busted/Episode-2
freeserial.to	Breaking Bad S03E01	https://www.freeserial.to/serial/breaking-bad/uz-ne/2480	Grey's Anatomy Season 7 Episode 11	https://www.freeserial.to/serial/greys-anatomy/kde-konci-veda-a-zacina-umeni/15199
freefilm.to	Dolittle	https://www.freefilm.to/film/dolittle	Frozen II	https://www.freefilm.to/film/ladove-kralovstvo-2

EXHIBIT A

Website	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
moviesjoy.to	Moxie	https://moviesjoy.to/watch-movie/moxie-68284.4111691	Primal Fear	https://moviesjoy.to/watch-movie/primal-fear-17814.2519167
rarbg.to	Frozen II	https://rarbg.to/torrent/jdukq2l	Beautiful Boy	https://rarbg.to/torrent/z2toxrd
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
yesmovies.to	Dolittle	https://yesmovies.to/movie/dolittle-100331.html	Beautiful Boy	https://yesmovies.to/movie/beautiful-boy-27433.html
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
ymovies.to	Moxie	https://ymovies.to/film/moxie-87517/watching/	Frozen II	https://ymovies.to/film/frozen-ii-83235/watching/
kisstvshow.to	Busted!: S1 E1	https://kisstvshow.to/Show/Busted/Episode-1	Busted!: S1 E2	https://kisstvshow.to/Show/Busted/Episode-2
freeserial.to	Breaking Bad S03E01	https://www.freeserial.to/serial/breaking-bad/uz-ne/2480	Grey's Anatomy Season 7 Episode 11	https://www.freeserial.to/serial/greys-anatomy/kde-konci-veda-a-zacina-umeni/15199
freefilm.to	Dolittle	https://www.freefilm.to/film/dolittle	Frozen II	https://www.freefilm.to/film/ladove-kralovstvo-2

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 350 South Grand Avenue
 3 Fiftieth Floor
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 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-01099

**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 Amazon Content Services, LLC, Disney Enterprises, Inc., Netflix US,
 25 LLC, Paramount Pictures Corporation, Sony Pictures Television Inc., and Universal
 26 City Studios Productions LLLP (“ACE Members”), each of which is a member of
 27 the Alliance for Creativity and Entertainment (“ACE”). ACE is a global coalition of
 28 leading content creators and on-demand entertainment services committed to


1 supporting the legal marketplace for video content and addressing the challenge of
2 online piracy. The ACE Members, whether themselves or through subsidiaries and
3 affiliates, own the copyrights in the below referenced copyrighted works.

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

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

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

20 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.

7
8 UNITED STATES DISTRICT COURT
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-01099

**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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By: /s/ Rose Leda Ehler
ROSE LEDA EHLER

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Attorney for Motion Picture Association,
Inc.

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