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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
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12 In Re 17 U.S.C. § 512(h) Subpoena to
13 TONIC DOMAINS CORPORATION

Case Number: 2:22-mc-00027

**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 Paramount Pictures Corp. and Warner Bros. Entertainment, Inc. (“ACE
25 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.

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

Website	Sample Infringed Title	Sample Infringing URL	Copyright Holder(s)
vumoo.to	Dune	vumoo.to/movies/dune-2021	Warner Bros. Entertainment Inc. & Legendary Features Productions US, LLC
vumoo.to	Clueless	https://vumoo.to/movies/clueless-1995	Paramount Pictures Corporation

16 3. The purpose for which this subpoena is sought is to obtain the identities
17 of the individuals assigned to these websites who have exploited ACE Members'
18 exclusive rights in their copyrighted motion pictures without their authorization.
19 This information will only be used for the purposes of protecting the rights granted
20 to ACE Members, the motion picture copyright owners, under Title II of the Digital
21 Millennium Copyright Act.
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1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct to the best of my knowledge,
3 information or belief.

4 Executed at Redondo Beach, California, on February 4, 2022.

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Jan van Voorn