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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: 2:22-mc-00042

**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 Columbia Pictures Industries, Inc., Disney Enterprises, Inc., Paramount
25 Pictures Corporation, Universal City Studios Productions LLLP, and Warner Bros.
26 Entertainment Inc. (“ACE Members”), each of which is a member of the Alliance
27 for Creativity and Entertainment (“ACE”). ACE is a global coalition of leading
28 content creators and on-demand entertainment services committed to supporting the

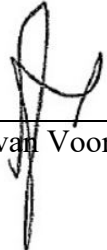
1 legal marketplace for video content and addressing the challenge of online piracy.
2 The ACE Members, whether themselves or through subsidiaries and affiliates, own
3 the copyrights listed in the attached **Exhibit A**.

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

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

15
16 I declare under penalty of perjury under the laws of the United States of
17 America that the foregoing is true and correct to the best of my knowledge,
18 information or belief.

19 Executed at Redondo Beach, California, on March 4, 2022.

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Jan van Voorn

Exhibit A

Index Domain	Affiliate Infringing Domain(s)	Title(s)	Infringing URL(s)
hdss.to	hdss.nu hdss.la – redirects to hdss.nu	Hobbs & Shaw Bad Boys for Life	hdss.nu/fast-furious-8-5-hobbs-shaw-a hdss.nu/bad-boys-for-life
primewirestatus.org	primewire.li primewire.vc primewire.ag - offline	Mortal Kombat Baywatch	primewire.li/movie/1354944-watch-mortal-kombat primewire.vc/movie/1354944-watch-mortal-kombat primewire.li/movie/652574-watch-baywatch primewire.vc/movie/652574-watch-baywatch
soapgate.cc	soap2day.to soap2day.ac soap2day.sh soap2day.cx s2dfree.to s2dfree.cc s2dfree.de s2dfree.is s2dfree.nl s2dfree.de	Encanto Spider- Man: Far from Home	soap2day.ac/MczozMjoiMTIzMzV8fDE1Ni4xNDYuNTkuNDI8fDE2NDQyNTc4NzliOw.html soap2day.sh/MczozMjoiMTIzMzV8fDE1Ni4xNDYuNTkuNDI8fDE2NDQyNTgwMDUiOw.html soap2day.ac/MczozMToiNjlxOXx8MTU2LjE0Ni41OS40OXx8MTY0NDI3MTA2OSI7.html soap2day.sh/MczozMToiNjlxOXx8MTU2LjE0Ni41OS40OXx8MTY0NDI3MTA2OSI7.html
onionplay.network	onionplay.se onionplay.re onionplay.co onionplay.su onionplay.ru onionplay.org onionplay.net	Despicable Me 3 Mulan	onionplay.se/movies/despicable-me-3-2017 onionplay.re/movies/despicable-me-3-2017 onionplay.se/movies/mulan-2020 onionplay.re/movies/mulan-2020

Title	US Copyright Holder(s)
Hobbs & Shaw	Universal City Studios Productions LLLP
Despicable Me 3	Universal City Studios Productions LLLP
Mortal Kombat	Warner Bros. Entertainment Inc.
Mulan	Disney Enterprises, Inc.
Encanto	Disney Enterprises, Inc.
Bad Boys for Life	Columbia Pictures Industries, Inc.
Baywatch	Paramount Pictures Corporation
Spider-Man: Far from Home	Columbia Pictures Industries, Inc.