



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

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March 4, 2022

VIA EMAIL
legal@cloudflare.com; abuse+law@cloudflare.com
Justin Paine, Cloudflare, Inc.
101 Townsend Street Legal Department
San Francisco, CA 94107

Re: Notice of Infringement Regarding Certain Cloudflare Users

Dear Mr. Paine:

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 infringing material described in the attached notice. 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

Attachment and Enclosure



EXHIBIT A

	Domain	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
1	hdss.nu	Hobbs & Shaw	hdss.nu/fast-furious-8-5-hobbs-shaw-a/	Bad Boys for Life	hdss.nu/bad-boys-for-life/
2	filmesonline.org	Godzilla vs Kong	filmesonline.org/filmes/godzilla-vs-kong/	Soul	filmesonline.org/filmes/soul-uma-aventura-com-alma-online-dublado-e-legendado-em-hd-1080p-gratis/
3	megafilmeshd20.pro	Godzilla vs Kong	megafilmeshd20.pro/assistir-filmes/godzilla-vs-kong-6.html/	A Quiet Place Part II	megafilmeshd20.pro/assistir-filmes/um-lugar-silencioso-25.html/
4	filmesonlinegratisbr.xyz	Godzilla vs Kong	filmesonlinegratisbr.xyz/media/assistir-online-godzilla-vs-kong/	Soul	filmesonlinegratisbr.xyz/media/assistir-online-soul/
5	superfilmesonline.pro (films open to mundotec.pro)	Godzilla vs Kong	superfilmesonline.pro/filme-godzilla-vs-kong-dublado-hd/	Soul	superfilmesonline.pro/filme-soul-dublado/
6	filmesonline.org	A Quiet Place Part II	filmesonline.org/assistir-um-lugar-silencioso-parte-ii-online-gratis	Soul	filmesonline.org/assistir-soul-online-gratis
7	zfilmesonline.net	A Quiet Place Part II	zfilmesonline.net/filme/4assistir-um-lugar-silencioso-parte-2-dublado-legendado-hd/	Soul	zfilmesonline.net/filme/assistir-soul/
8	onionplay.se	Spider-Man: Far from Home	onionplay.se/movies/spider-man-far-from-home-2019/	Hobbs & Shaw	onionplay.se/movies/fast-furious-presents-hobbs-shaw-2019/
9	imapple.tv	Law & Order: Season 20	imapple.tv/voddetail/407308.html	Naomi	imapple.tv/voddetail/392910.html
10	SSphim.net	Frozen II	ssphim.net/p/xem-phim-nu-hoang-bang-gia-2-frozen-2	Jumanji: The Next Level	ssphim.net/p/xem-phim-juanji-tro-choiky-ao-thang-cap-juanji-the-next-level
11	btnull.org	Godzilla vs Kong	btnull.org/mv/9y5j.html	Encanto	btnull.org/mv/GyM3.html
12	pttplay.cc	Wonder Woman 1984	pttplay.cc/v/99380-2-1.html	Cruella	pttplay.cc/v/184015-5-1.html

	Domain	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
13	idlix.cc	Wonder Woman 1984	idlix.cc/movie/wonder-woman-1984-2020/	Encanto	idlix.cc/movie/encanto-2021/
14	filmpalast.to	Tenet	filmpalast.to/stream/tenet	Bad Boys for Life	filmpalast.to/stream/bad-boys-for-life
15	ummagurau.com	Spider-Man: No Way Home	ummagurau.com/watch-movie/spider-man-no-way-home-71326.5601538	Raya and the Last Dragon	ummagurau.com/watch-movie/raya-and-the-last-dragon-66700.4791574
16	tamilblasters.com	Space Jam: A New Legacy	tamilblasters.com/index.php?/forums/topic/28677-space-jam-a-new-legacy-2021-english-hd-watch-online/&tab=comments#comment-85662	Raya and the Last Dragon	tamilblasters.com/index.php?/forums/topic/29236-raya-and-the-last-dragon-2021-hd-watch-online/&tab=comments#comment-86451
17	watchmovierulz.co	Spider-Man: No Way Home	watchmovierulz.co/spider-man-no-way-home-2021-english/full-movie-watch-online-free-11-4564.html	Raya and the Last Dragon	watchmovierulz.co/raya-and-the-last-dragon-2021-english/full-movie-watch-online-free-67-3429.html
18	extramovies.wine	Spider-Man: No Way Home	extramovies.wine/extrastream.php?url=r2-1qfer387r8wq	Raya and the Last Dragon	extramovies.wine/extrastream.php?url=158g6tj2kgz7pzw
19	Vizjer.com	Hobbs & Shaw	vizjer.com/film/szybcy-i-wsciekli-hobbs-i-shaw-fast-furious-presents-hobbs-shaw-2019	Encanto	vizjer.com/film/nasze-magiczne-encanto-encanto-2021
20	Vizjer.pl	Hobbs & Shaw	vizjer.pl/film/szybcy-i-wsciekli-hobbs-i-shaw-fast-furious-presents-hobbs-shaw-2019	Encanto	vizjer.pl/film/nasze-magiczne-encanto-encanto-2021
21	layarkacaxxi.icu	Wonder Woman 1984	layarkacaxxi.icu/v/yx8wpuep1e60e4j	Hobbs and Shaw	layarkacaxxi.icu/v/yx8wpueex4xln16
22	moviemocha.com	Tenet	moviemocha.com/?r=movie_view&id=22672	A Quiet Place Part II	moviemocha.com/?r=movie_view&id=26142

Title	US Copyright Holder(s)
A Quiet Place Part II	Paramount Pictures Corporation
Cruella	Disney Enterprises, Inc.
Encanto	Disney Enterprises, Inc.
Frozen II	Disney Enterprises, Inc.
Godzilla vs Kong	Warner Bros. Entertainment Inc.
Soul	Disney Enterprises, Inc.
Tenet	Warner Bros. Entertainment Inc.
Hobbs & Shaw	Universal City Studios Productions LLLP
Bad Boys for Life	Columbia Pictures Industries, Inc.
Spider-Man: Far from Home	Columbia Pictures Industries, Inc.
Wonder Woman 1984	Warner Bros. Entertainment Inc.
Law & Order: Season 20	Universal Network Television LLC
Naomi	Warner Bros. Entertainment Inc.
Jumanji: The Next Level	Columbia Pictures Industries, Inc.
Raya and the Last Dragon	Disney Enterprises, Inc.
Spider-Man: No Way Home	Columbia Pictures Industries, Inc.; Marvel Characters, Inc.
Space Jam: A New Legacy	Warner Bros. Entertainment Inc.