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10 **UNITED STATES DISTRICT COURT**
 11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
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13 In Re 17 U.S.C. § 512(h) Subpoena to
 14 CLOUDFLARE, INC.

Case Number: 2:22-mc-00085

**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 Disney Enterprises, Inc., and Netflix US, LLC (“ACE Members”), each of
 25 which is a member of the Alliance for Creativity and Entertainment (“ACE”). ACE
 26 is a global coalition of leading content creators and on-demand entertainment
 27 services committed to supporting the legal marketplace for video content and
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1 addressing the challenge of online piracy. The ACE Members, whether themselves
2 or through subsidiaries and affiliates, own the copyrights in *Maleficent* and *Spenser*
3 *Confidential*.

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 a1streams.com infringing website.

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

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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.

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20 Executed at Redondo Beach, California, on April 7, 2022.

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Jan van Voorn