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UNITED STATES DISTRICT COURT

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CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

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In Re 17 U.S.C. § 512(h) Subpoena to
14 CLOUDFLARE, INC.

Case Number: 2:22-mc-00086

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**DECLARATION OF JAN VAN
VOORN IN SUPPORT OF
ISSUANCE OF SUBPOENA
PURSUANT TO 17 U.S.C. § 512(h)**

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I, Jan van Voorn, the undersigned, declare that:

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1. I am Executive Vice President and Chief of Global Content Protection for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on behalf of Columbia Pictures Industries, Inc., Columbia Pictures Industries, Inc.; Marvel Characters, Inc., Disney Enterprises, Inc., Netflix, Inc., Universal City Studios Productions LLLP, Warner Bros. Entertainment Inc., and Warner Bros. Entertainment Inc.; Legendary Features Productions US, LLC (“ACE Members”),

Case No. 2:22-mc-00086

1 each of which is a member of the Alliance for Creativity and Entertainment
2 (“ACE”). ACE is a global coalition of leading content creators and on-demand
3 entertainment services committed to supporting the legal marketplace for video
4 content and addressing the challenge of online piracy. The ACE Members, whether
5 themselves or through subsidiaries and affiliates, own the copyrights listed in the
6 attached **Exhibit A**.

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

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

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

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

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Jan van Voorn

EXHIBIT A

Domain	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
dandanzan.com	Encanto	dandanzan.com/dianying/94594.html	Outside the Wire	dandanzan.com/dianying/81539.html
tinyzonetv.to	Dune	tinyzonetv.to/watch-movie/watch-dune-2021-free-6752.4792159	Frozen	tinyzonetv.to/watch-movie/watch-frozen-2013-free-19753.5297356
lookmovie2.to (videos link to lookmovie190.xyz)	Frozen II	lookmovie190.xyz/m/17/58373/s	Spider-Man: Far from Home	lookmovie190.xyz/m/17/58454/s
baixarseriesmp4.club	Godzilla vs Kong	baixarseriesmp4.club/baixar-godzilla-vs-kong-2021-mp4-legendado/	Soul	baixarseriesmp4.club/baixar-soul-2020-mp4-dublado/
phimmoichill.net	Dune	phimmoichill.net/xem/dune-hanh-tinh-cat-tap-full-pm91403	Spider-man: No Way Home	phimmoichill.net/xem/nguoi-nhen-khong-con-nha-tap-full-pm92448
pelisplus2.io	Dune	pelisplus2.io/pelicula/duna	Frozen II	pelisplus2.io/pelicula/frozen-2-ooeitdn
pelisflix.li	Dune	pelisflix.li/pelicula/dune-d2f4s3x2n4q1	Encanto	pelisflix.li/pelicula/encanto-a2d4k1t1x3b4
pelispop.me	Dune	pelispop.me/ver-dune-online-latino	Encanto	pelispop.me/encanto-online-latino
movieffm.net	Godzilla vs Kong	movieffm.net/movies/godzilla-vs-kong	Raya and the Last Dragon	movieffm.net/movies/raja-and-the-last-dragon
entrepeliculasyseries.nu	Dune	entrepeliculasyseries.nu/pelicula/dune-duna	Encanto	entrepeliculasyseries.nu/pelicula/encanto
9anime.vc	Spirited Away	9anime.vc/watch/spirited-away-20?ep=58021	Kengan Ashura: Part II	9anime.vc/watch/kengan-ashura-2nd-season-932?ep=51904
french-stream.re	Fast & Furious Presents: Hobbs & Shaw	french-stream.re/film/168406-fast-furious-hobbs-shaw-film-streaming-complet-vf.html	Bad Boys for Life	french-stream.re/film/169834-bad-boys-for-life-film-streaming-complet-vf.html
poseidonhd.nz	Dune	poseidonhd.nz/pelicula/ver-online-duna-hd/	Encanto	poseidonhd.nz/pelicula/ver-online-encanto-hd/
fzmovies.net	Encanto	fzmovies.net/stream.php?streamkey=3-41673-ac54dea0bc5a534b65f94a87cceeaedf&pt=jRGarGzOo2	Bad Boys for Life	fzmovies.net/stream.php?streamkey=3-34744-5d01002ee93bf630d9b165d91c7cde7d&pt=jRGarGzOo2

Title	US Copyright Holder(s)
Dune	Warner Bros. Entertainment Inc.; Legendary Features Productions US, LLC
Encanto	Disney Enterprises, Inc.
Frozen II	Disney Enterprises, Inc.
Godzilla vs Kong	Warner Bros. Entertainment Inc.
Soul	Disney Enterprises, Inc.
Spider-Man: Far from Home	Columbia Pictures Industries, Inc.
Outside the Wire	Netflix, Inc.
Raya and the Last Dragon	Disney Enterprises, Inc.
Spider-Man: No Way Home	Columbia Pictures Industries, Inc.; Marvel Characters, Inc.
Miyazaki's Spirited Away	Disney Enterprises, Inc.
Kengan Ashura: Part II	Netflix, Inc.
Fast & Furious Presents: Hobbs & Shaw	Universal City Studios Productions LLLP
Bad Boys for Life	Columbia Pictures Industries, Inc.