



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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April 7, 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
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.