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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 TONIC DOMAINS CORPORATION

Case Number: 2:22-mc-00087

**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:

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 23 1. I am Executive Vice President and Chief of Global Content Protection
 24 for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on
 25 behalf of Columbia Pictures Industries, Inc., and Disney Enterprises, Inc. (“ACE
 26 Members”), each of which is a member of the Alliance for Creativity and
 27 Entertainment (“ACE”). ACE is a global coalition of leading content creators and
 28 on-demand entertainment services committed to supporting the legal marketplace


1 for video content and addressing the challenge of online piracy. The ACE
2 Members, whether themselves or through subsidiaries and affiliates, own the
3 copyrights to *Frozen II* and *Spider-Man: Far from Home*.

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 lookmovie2.to.

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