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

Case No.: 2:22-mc-00174

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

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

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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., (“ACE Member”), which is a member of the  
25 Alliance for Creativity and Entertainment (“ACE”). ACE is a global coalition of  
26 leading content creators and on-demand entertainment services committed to  
27 supporting the legal marketplace for video content and addressing the challenge of  
28

1 online piracy. The ACE Members, whether themselves or through subsidiaries and  
2 affiliates, own the copyrights in the below referenced copyrighted works.

| Infringed Title     | Domain     | Channel Backend Link          |
|---------------------|------------|-------------------------------|
| Mulan (Live Action) | sltube.org | sltube.org/e/NBQe7lB3Wmbn59bO |
| Encanto             | sltube.org | sltube.org/v/BWwyJnLaR1VDMbPa |

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

14       3.     The purpose for which this subpoena is sought is to obtain the identities  
15 of the individuals assigned to these websites who have exploited ACE Members'  
16 exclusive rights in their copyrighted motion pictures without their authorization.  
17 This information will only be used for the purposes of protecting the rights granted  
18 to ACE Members, the motion picture copyright owners, under Title II of the Digital  
19 Millennium Copyright Act.  
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information or belief.

Executed at Redondo Beach, California, on September 2, 2022.



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Jan van Voorn