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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-00175

**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 Columbia Pictures Industries, Inc. (“ACE Member”), which is a member
25 of the Alliance for Creativity and Entertainment (“ACE”). ACE is a global coalition
26 of 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
Uncharted	televisiongr atisenvivo.c om	https://televisiongratisenvivo.com/embed/canal.php?ch=hbo
Angels & Demons	televisiongr atisenvivo.c om	https://televisiongratisenvivo.com/embed/canal.php?ch=warner

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

15 3. The purpose for which this subpoena is sought is to obtain the identities
16 of the individuals assigned to these websites who have exploited ACE Members'
17 exclusive rights in their copyrighted motion pictures without their authorization.
18 This information will only be used for the purposes of protecting the rights granted
19 to ACE Members, the motion picture copyright owners, under Title II of the Digital
20 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.



Jan van Voorn