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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-00176

**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 Universal City Studios Productions LLLP, and Warner Bros.  
25 Entertainment Inc. (“ACE Members”), each of which is a member of the Alliance  
26 for Creativity and Entertainment (“ACE”). ACE is a global coalition of leading  
27 content creators and on-demand entertainment services committed to supporting the  
28 legal marketplace for video content and addressing the challenge of online piracy.

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

Infringed Title	Domain(s)	M3u Portal List	Channel Backend Link
R.I.P.D.	sapphirebil ling.net	portal5458.com: 8080	38.91.57.30:25461/2raYXVDRreg/ 21044896944/15924?token=TUE MUBFQFVsUBVtUVwRSB15cV1 4AUwsJVwcGV1QBVwAPUFQG V1pSVgcWFRdHQxcHWQk6UV0 SAwBXCIECGhpGEFMRO1gGG g1DBAMBDQcBR04aEAxVXBID AFQFUgUDAABaBk9GQQtcFVs UBwwCBxVJQF0cEV1LXlhdPvc GQF9bVkEMDRFdDhQVDlhrXV BZVgsGG15HCBscG1gRQ0EMW E1fdxpBBlgWSIYVUxYDFwcEU FIaSEdbVkVXRRBKQQwUenZB GkEBSRZdWRJfW1cXDhURERp IR1FKb0tUEUcRU1dVvhEUWU YBQBQVDFdMZIZbWQsHWxA MV1dDGwtABkEaFFVcDV8XC0 M9SF4FFA4bAQMUFUFYaGQ==
The Conjuring: The Devil Made Me Do It	sapphirebil ling.net	portal5458.com: 8080	38.91.57.30:25461/2raYXVDRreg/ 21044896944/15915?token=TUE MUBFQFVsUVgoBVQ5WVgtXX FlbVQsFAQtRBwULAQVSW1cC VwABWQQWFRdHQxcHWQk6 UV0SAwBXCIIIDGhpGEFMRO1g GGg1DBAMBDQcBR04aEAxVX BIDAFQFUgUACAdQBk9GQQtc FVsUAA4DAQFHThoBHUXcQld QDmwHU0BRUAYUWQpEDIQb Q1laZIFRWgQMXEZfGgkSFRM LQBMUDFZGD1pPRIMLTEUAQ IEbDxYEXVsARkkaW19MXxZB GhQMGNEmFE9GVBPmUg9FXV ZbFg1HFktGSRpQQ2ZDB0AXRF NZXgZEqV4TUhobQ1tVQWpX WAsMXQcRUVZeShNYEVYUG hpeDFgKEF4QZ0cIUhYDFwAAV 1YMRhg=

25 2. The ACE Members (via the Motion Picture Association, Inc.) are  
 26 requesting issuance of the attached proposed subpoena that would order Cloudflare,  
 27 Inc. to disclose the identities, including names, physical addresses, IP addresses,  
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1 telephone numbers, e-mail addresses, payment information, account updates and  
2 account histories of the users operating sapphirebilling.net.

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

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

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

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16 Jan van Voorn  
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