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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 TONIC DOMAINS CORPORATION

Case No.: 2:22-mc-00180

**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:

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.

3 2. The ACE Members (via the Motion Picture Association, Inc.) are
 4 requesting issuance of the attached proposed subpoena that would order Tonic
 5 Domains Corporation to disclose the identities, including names, physical addresses,
 6 IP addresses, telephone numbers, e-mail addresses, payment information, account
 7 updates and account histories of the users operating the following websites:

Infringed Title	Domain(s)	M3u Portal List	Channel Backend Link
Godzilla vs. Kong	cardsharining-kaufen.to	saurustv.xyz:8080	185.53.88.49:80/vauth/264399.mkv?token=8_yXcaPpe1TR_rDqctaI9ZcDWskTGymI-sjF9s5ceGHzoSjV5ew407b175yxTeOSI5no uSTTxKw0Ulm75NAkXtYjGMNxcmpwTEfTeOqZhhRpszO45Cm5D0tMnpEa-GIHkyxJ46xw7RZevl_yKgIWUhiP0fm3EHic9p3STM86o4hyUw79_UeTmIEnZroQxgGqeJT_8G5PXILDr0B-5aqTuHf0ZeVUIo91ejHBrMgM07KT2vy9VqBMxlsYk-X3lm1ZzcY5BIsDXXpT6G7s8dFo-D0-ewWBhUv2ApGffpZzb7Z5NPpk39VFDYvqqWpXvBNYU7TRIBUg9xrHki7DnVbAFGi-BUuVMzh4cPfoF0m0IUwjORV0UbZckIzmR3TIzltr1GudboXM0Jwl8WPLeMgxDGu6kpCpqBLorNENSP02ZbBB25ZK_Iz-UECKOs_HakDD_F-4fzuhlnQtI39Hob4iC0dlLULtCV3Jyj3Ofcvded3KTBV1H1zto-g9Uq_7Wm1IKU3WoCIVNVIvqfKscaViORwCbw01x2rqZVb7C7xi44s8ctsV7-WAXDujpMKoL1N0OdQF6uvbpE_VAn89YiBLE82S9kiDv9bpxzRMCDOk_w
Fast And Furious Presents: Hobbs and Shaw	cardsharining-kaufen.to	saurustv.xyz:8080	185.53.88.49:80/vauth/266605.mkv?token=OOUpzJAibhx9AytFDQObcGTVt40HLKk kQHUVT32mYcaR7teSpS-AG7RmNsj1mwugk-KkS-sw03SBIJzwKfClofy5n5hj13UHsQfReJhPT hA_o074sAqQJvd4VaAfhKOML86EWHZ TleT_U3tSiMulMJsDkVfH6CKYzrtqMU4m83x-c9kK4rboqORHkopSBCPrFII_eV3WyjaTa HEkhskbRkxntfjgzvbF7k2sSt0ChnN_d-FkJ_6SI2WzD3C23puPUTIVNdo_QJMfx2kZBI9Dm1vl0eAKb0_em3oRLYWpntPrSo pYZGlhETRbYISdKYUgWpsqrrhM3PKR JaFBUTwYOsIf51L6nOOIWT_eXtOCK2PL

Infringed Title	Domain(s)	M3u Portal List	Channel Backend Link
			5gkA-xl4xIg9WMjIzW1mzCzQWf__waJ4-SM3IE8OMoAY_qaKZcj-vmdO_47wCo1dTGe-FEajMyVvNLfKhgr7bq1ilG6L4uzwir1SEhfUQzGpeaDLEbCyc5XaljErF43byehfmoBrfVJ3qDnzDrr3JfP4-r2SGOreFRusSmDCG4VveyL-Sl-FVWNg90jQgCEIfPXGObsilWVSKIYvBeP8bdirWRJrRWOFFfxwWZAxFZA7JwWPAwRghl33tBt5uos

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

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