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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 Number: 2:22-mc-00221

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

1 online piracy. The ACE Members, whether themselves or through subsidiaries and
 2 affiliates, own 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 Cloudflare,
 5 Inc. to disclose the identities, including names, physical addresses, IP addresses,
 6 telephone numbers, e-mail addresses, payment information, account updates and
 7 account histories of the users operating the following websites:

No	App Name	Download Site	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
1	BeeTV v3.3.2	beetvapk.app/download.html	Minions 2: The Rise of Gru	abcd.voxzer.org/stream/62bdabb19f7bd1c6c5198fc7/1080/index627.ts	Encanto	hfs270.serversicuro.cc/hls/dnzpe3do3hg4a3gyv aqh72rjyyc4hdjfeor6zagqvqwb wevt75uxjwam xlqa/seg-93-v1-a1.ts
2	TeaTV v10.5.4r	teatv.net/dl	Frozen	streamhub.to/d/2r86xadrsg1v	10 Cloverfield Lane	v2.vidsrc.me/embed/tt1179933/

16 3. The purpose for which this subpoena is sought is to obtain the identities
 17 of the individuals assigned to these websites who have exploited ACE Members'
 18 exclusive rights in their copyrighted motion pictures without their authorization.
 19 This information will only be used for the purposes of protecting the rights granted
 20 to ACE Members, the motion picture copyright owners, under Title II of the Digital
 21 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 November 11, 2022.



Jan van Voorn