

1 TIANA S. BAHERI (State Bar No. 330835)  
Tia.Baheri@mto.com  
2 MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue  
3 Fiftieth Floor  
Los Angeles, California 90071-3426  
4 Telephone: (213) 683-9100  
Facsimile: (213) 687-3702

5 Attorneys for Motion Picture Association, Inc.  
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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-00242

**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., Paramount Pictures Corp., and Warner  
25 Bros. Entertainment, Inc. (“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	Domain	M3u Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
1	iptvdark.com	line.dar rktv- pro.m e:80	Aquaman	103.176. 90.154:8 080/live/ plav/T0d wcE5rV mlMM3 BhUkhk dldYTXJ OR0Yv U0VWa WEwWn FUVEp3 UlhseFd GWXdN WEpHV m5sclR XZGhR VDA9/1 50522	Like a Boss	103.176.90.161:8080/l ive/plav/TkZBMFIVE G9aa2R6UTNkVU5E aG9OR2RGWmtoS1 NUazRWbFo1V1hsU WNlbHBMMDh2Vmt kS1JuazJXVDA9/168 982
2	iptvfinla nd.me	worldi ptv.me :8080	Men In Black II	85.203.1 7.41:808 0/live/pl av/WiFo UlbURld TM05M VFRkc1 YzUm9i RIJvY21 0UE1rM XNNakl 3Y0RC MmRXe EISbWx DV0VaT 2IwMT VORDA 9/87213	Top Gun	85.203.17.54:8080/liv e/plav/VEhCWIIvWll NMDlhUzFFeVYzZH FRVzVaTmxBclJTcz VNVW8xY25OSWO zUiRXWE5zVkhKbG FFeDVkejA9/118949

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

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

11           Executed at Redondo Beach, California, on December 9, 2022.




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Jan van Voorn

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