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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: 2:23-mc-00094

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

1 themselves or through subsidiaries and affiliates, own the copyrights in the below  
2 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	planetapl.tv	online.planetapl.tv	Mulan (Live Action)	s8-1.cdn.de.com/cdn/901e845e802efc71060cf76892303e3ca92c743ffbf776d0de0c3b372b52b82dc3a9bfe607b7001/index.m3u8?token=0.907308.927810.14480 WTBoWmhSdEJsRnJXMWtjOXErY1VTbDlya3N6K1pWcHI5OXpEaFJXRQ3N0VHM3B5RXNpckxyVVdiV2JUZkdjTy9XK04reXk1QnRaaG11VzIzYkNHVUFGdzI3WHMvWHRmbW	Top Gun: Maverick	s8-1.cdn.de.com/cdn/901e845e802efc710060cf76882604e1cf92c743ffbf775417fcfdb58e944dd8d6296e827752f283fadf9141f88d1a4589a3d/index.m3u8?token=5.907308.927810.18980 Q0UvVWlyVkJ9WRVp6YzJPZVUweUR6Y2pkbWw5MGVxZUROQnBtdmFSSIRENy84MHFMNEd0ZnROTzFTQ1BtQVlrZjdPUzZIU3BFdkozODVqV

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No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				93M3FvOC9F dzR5UTU4Q mNGOEVTVz B4UHJxSnFtQ 2g3SERnaEZR bllWeE5weEl aZWNFSU9M Z1g4OFVuOT dlcjZqNmx6N 3dWdE9hQjF BWEVPM3RH V21WclZOaV VueFFteWliS 25QbW9TW m5XQklJYmd WclJad0tlSFl HSVBHRTFVa E1PNjdveERn L1BmMnp4U WINNDNkNU d6V053QnVs RkdQZU9BSF VrRCs3MGNz M1ILREhwQ mFOcTZvcW9 DVXJyYWtuM E1rUFFJb2VP TDh3dWdMV ytuTXNSK2IT NForaFdWdH l2ekRRUW8w Z2g5b0owMI QyZEZhSDht NIFJbTU5T0F RSzZleDU2OE k1dUU0STZH		EMybGJnQ XpXQm5M WEJHVlloM 09hMG5NQ y8zRXREd0 xpaHVDTF BhYTVRUG F4b2t1enBn cUIMRkFEc Vhqc0E4ZF c4SCtWUzR FU2JsTlhje DIDUDU4U GtOcFcrS3V WcUJtRklN VVllZUhjcl RodWFZQ0 cvYm8ycWd iNWJBOHB pRTI0SFUv ZXArVGRY VE5CaEFuS mJBSW1reX Vkt2dOL0J 5NENibE9j N0dGNERY UnpLdEZQa kFRc003V3 FtRWtaaTIC blhTNVM2b m1rNjVnbzI rWkZaZ1die Ek4UIVVRI RjdXdZbUl DNkJ2eGxu S2tkSGhNa0 k5M2Z2ajN 6NmZFZmd

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No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				aXRoWGJKa0 N2bVEzbFZO OFhPNk02d W42Smgrd1A 4c2pwbE1Qa DZnSnIRNIVO ZzNxdHRFcG QybHc2MD1 8RG55bHNPZ jHOG9SK0cv NOJkYzZldHR 1dkFNOFJKU EpXMEtnaWh QUFE4RT0%3 D		5YmpvT1JQ SkJTeTc5cz U0SmlZWH YxYmVhenI ycFdOVk9iS zhBYzJ4Wn dUODB6Z0 VPQjhXVW x2Mjh6R0U xSWNJVTZ 5TUVpY3J mQ3NZSW VtTkFHaElr d2xETmNIT HY1cTJ0N0 NCSDDBHY2 4zZzgrU0ZS WXptZmZv SWlkTExzS Gtlc0Z6UFF VYWVRaIE 9PXxDeEYx cnhvVkVXL 3RHV0pTR XRJQIRMT nNuVFNka UZQaE14c0 JaKy9TK2Z RPQ%3D%3 D

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

1 to ACE Members, the motion picture copyright owners, under Title II of the Digital  
2 Millennium Copyright Act.

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

7 Executed at Redondo Beach, California, on July 5, 2023.

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Jan Van Voorn