

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.  
6  
7  
8

9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
11

12 In Re 17 U.S.C. § 512(h) Subpoena to  
13 CLOUDFLARE, INC.

Case Number: 2:23-mc-00095

**DECLARATION OF JAN VAN  
VOORN IN SUPPORT OF  
ISSUANCE OF SUBPOENA  
PURSUANT TO 17 U.S.C. § 512(h)**

14  
15  
16  
17  
18  
19  
20 I, Jan van Voorn, the undersigned, declare that:

21  
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., Netflix Worldwide Entertainment, LLC,  
25 Paramount Pictures Corp., Universal City Studios Productions LLLP, Viacom  
26 International Inc., SPE Visual Works Inc., and Warner Bros. Entertainment, Inc.  
27 (“ACE Members”), each of which is a member of the Alliance for Creativity and  
28 Entertainment (“ACE”). ACE is a global coalition of leading content creators and

1 on-demand entertainment services committed to supporting the legal marketplace  
 2 for video content and addressing the challenge of online piracy. The ACE  
 3 Members, whether themselves or through subsidiaries and affiliates, own the  
 4 copyrights in the below referenced copyrighted works.

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

No	Domain	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	animeda o.to	The Legend of Korra S01E01	animedao.to/wat ch/3093320099/	Yasuke S01E01	animedao.to/watc h/3093363357/
2	animet.s ite	Tokyo Pig S01E02	animet.site/anim e/watch/2280/zor o/tokyo-pig- 6066-episode- 94166	Legend of Mana - The Teardrop Crystal S01E01	animet.site/anime /watch/136150/go go/seiken- densetsu-legend- of-mana-the- teardrop-crystal- episode-1
3	animeka izoku.co m	Yasuke S01E01	animekaizoku.co m/yasuke- 43697/	Miyazaki's Spirited Away	animekaizoku.co m/spirited-away- 199/
4	baixarse riesmp4. eu	Elvis	baixarseriesmp4. eu/baixar-elvis- 2022-mp4- dublado-e- legendado- Mr4E/	Encanto	baixarseriesmp4.e u/baixar-encanto- 2021-mp4- dublado-e- legendado-jcc3/
5	2now.tv	Encanto	2now.tv/movie/e ncanto#watch- video	Sonic the Hedgehog 2	2now.tv/movie/so nic-the- hedgehog- 2#watch-video

6	verseries-de.online	Top Gun: Maverick	verseries-de.online/Pelicula/top-gun-maverick-online-completa-en-espanol-latino/	Minions 2: The Rise of Gru	verseries-de.online/Pelicula/minions-nace-un-villano/
7	nu6i-bg-net.com	Minions 2: The Rise of Gru	nu6i-bg-net.com/%d0%bc%d0%b8%d0%bd%d1%8c%d0%be%d0%bd%0%b8%d1%82%d0%b5-2-2022-bg-%d0%be%d0%bd%d0%bb%d0%b0%d0%b9%d0%bd-%d1%84%d0%b8%d0%bb%d0%bc%d0%b8_b4ad488d2.html	Tom and Jerry	nu6i-bg-net.com/tom-and-jerry-the-movie-%d1%82%d0%be%d0%bc-%d0%b8-%d0%b4%d0%b6%d0%b5%d1%80%d0%b8-%d1%84%d0%b8%d0%bb%d0%bc%d1%8a%d1%82-2021-%d0%be%d0%bd%d0%bb%d0%b0%d0%b9%d0%bd-%d1%84%d0%b8%d0%bb%d0%bc%d0%b8_b0d4c6e80.html
8	online-filmek.me	Encanto	https://online-filmek.me/film/31720-encanto	Top Gun: Maverick	https://online-filmek.me/film/33046-top-gun-maverick
9	mozinet.me	Encanto	https://mozinet.me/g1/MzE3MjA=	Top Gun: Maverick	https://mozinet.me/g1/MzMwNDY=
10	filmvilag.me	Encanto	filmvilag.me/get/film/2670651	Top Gun: Maverick	filmvilag.me/get/film/2961792

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.

1 This information will only be used for the purposes of protecting the rights granted  
2 to ACE Members, the motion picture copyright owners, under Title II of the Digital  
3 Millennium Copyright Act.

4

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

8

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

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28



---

Jan Van Voorn