

1 TIANA S. BAHERI (State Bar No. 330835)
Tia.Baheri@mta.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 UNITED STATES DISTRICT COURT
8 CENTRAL DISTRICT OF CALIFORNIA
9 WESTERN DIVISION
10

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

Case Number: 2:23-mc-00146

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

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19 I, Jan van Voorn, the undersigned, declare that:

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21 1. I am Executive Vice President and Chief of Global Content Protection
22 for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on
23 behalf of Disney Enterprises, Inc. and Paramount Pictures Corporation (“ACE
24 Members”), each of which is a member of the Alliance for Creativity and
25 Entertainment (“ACE”). ACE is a global coalition of leading content creators and
26 on-demand entertainment services committed to supporting the legal marketplace
27 for video content and addressing the challenge of online piracy. The ACE
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1 Members, whether themselves or through subsidiaries and affiliates, own the
 2 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	tubeyworld.com	tubeyrack.com:443	Frozen	15.235.86.49:80/vauth/A7wudAoKXL3oqZov kitwQSyHPUz-g9BHcwev10UzjDK7mr67TmkjonvxtPNTn--8djXMg6NcOssQaeKJE0n5YZVbYtsfCHcS_aHQWznZpDm2dOYQhrotWyalHcGY8bnxQexvZDi4AaeN IV5k49jrY_Vrz8d6z wfnQ_mWhBYW3_4cG5dkjAi4C-koambS26-T6rDarnQDwlPSz0RobDeRLhmx5g6dlgt4r-MAQ76xTrQJH3_CGi3J-c_wSHgkrIKZDPV1QX4k75dzV -faf0-SInOsfjYhiwCfWhewWyrfekVC1J2R5zK36mpt6DnzNRqhp034ITjSGV9_hGFZ936liKvKYNbg	Top Gun: Maverick	15.235.86.49:80/vauth/Pn4wvVXPR7NU NEBETRaaNsRcKwCxJV42NsljVRkE0d0OZHbmMspqDQrFiWjx3Nsbyxc8hxSat-6XT8gtHozoT IrMnsDQUSC5eInHxQVg6c_dy5m0eNb2r_y5Byai5OniuOHJIVmaF4UHVxoT9joXMwpDhNOPShc76wPjf_jKFMnZ-n_y7zNWzd4C_LWjELI03ny6Q8whjEgpLNHoGMiZbWCTzce3KaENcejpfAii2WmMBhxi5DdfmmsiOI6VnztO9gWDI GBSneBdnj9IdXO84KKorRAEvh49VNMce7B03uyZNHQRUVJuiqTbWifDaIUOKxPUXyWWoKt-DMPfHdF94NKzPmIxbVq

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No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				2223VfJi9xPu - tdgPpODyuru nPSMaTgQW ypcrUxucjl a LcSnT57znYv 02bVYgJqZP Bova7w5aoPx h8YvA82DIJt HrzHSdijn62f J3x1wk9NJ6tl SYPIsQzk1f MskOuO6fH Kvgb8spu15Z Q1TQb2drAd YP8W95clZU L6QWwxTl9 NJbzfOnmWo ILgM- fq4viWVtz9L 2s NI9bQzul CPftfdiESO1j dYAJDF3em Yooxpp8r- ngYNifo1Tmc XMKijc- 0zF9h8TEs4h O00q8m8595 y9ShRI0rbiiW OWcIMp2gFx hA8vMrlG		VTC9pCxtjV S- UZ 2vMMk I HwTThd- vS Vruqv9JI G0uBKxJkAb 0Z3yvtGYrO WnGQDbBJy MIqjooQCh- L177KWzW4t cg3fbRe0hBp 7XALjtCa1gC 5V7KzZqrCW XOTKedRDJ pHgzyu6wOo JXxjkd 8Afz LiOsFH2s Ld lwMnTnWUg qQjDQZWDk Zu- sAFHf56BfXb nZr0ZmH2Oy LwOpT34UV CelBWvhtQ3 N0iaYMpsrD YAQKC6Kg DwrfYtuw- DMdFF4m1N Tj0aw F9pzZ dHOM2zsbUZ p9VqTJO6FA PbLRgzd74rf7 5Psg
2	tubeyrack.com	tubeyrack.com:443	Frozen	15.235.86.49: 80/vauth/A7w udAoKXL3oq Zov kitwQSy HPUz- g9BHcwev10 UzjDK7mr67 TmkjonvxtPN Tn-- 8djXMg6NcO ssQaeKJE0n5 YZVbYtsfCH cS aHQWznZ pDm2dOYQh rotWyalHcGY 8bnxQexvZDi 4AaeN 1V5k4 9jrY VrZ8d6z wfnO mWhB	Top Gun: Maverick	15.235.86.49: 80/vauth/Pn4 wvVXPR7NU NEBETRaaNs RcKwCxJV42 NsljVRkE0d0 OZHbmMspq DQrFiWjx3Ns byxc8hxSat- 6XT8gtHozoT IrMnsDQUSC 5eInHxQVg6c dy5m0eNb2r y5Byai5Oniu OHJIVmaF4U HVxoT9joXM wpDhNOPShc 76wPjf_jKFM nZ-

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No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				YW3_4cG5dk jAi4C- koambS26- T6rDarnQDwl PSz0RobDeR Lhmx5g6dlgt4 r- MAQ76xTrQJ H3_CGi3J- c_wSHgkrIKZ DPV1QX4k75 dzV_-faf0- SInOsfjYhiw CfWhewWyrf ekVC1J2R5z K36mpt6Dnz NRqhp034ITj SGV9_hGFZ9 36ljKvKYNbg 2223VfJi9xPu - tdgPpODyuru nPSMaTgQW yprUxucjl_a LcSnT57znYv 02bVYgJqZP Bova7w5aoPx h8YvA82DIJt HzrHSdijn62f J3x1wk9NJ6tl SYPIsQzk1f MskOuO6fH Kvgb8spu15Z Q1TQb2drAd YP8W95clZU L6QWwxTl9 NJbzfOnmWo ILgM- fq4viWVtz9L 2s_NI9bQzu1 CPftfdiES01j dYAJDF3em Yooxpp8r- ngYNifo1Tmc XMKijc- 0zf9h8TEs4h O00q8m8595 y9ShRI0rbiiW OWcIMp2gFx hA8vMrlG		n_y7zNWzd4 C_LWjELl03 ny6Q8whjEgp LNHoGMiZb WCtzcE3KaE NcejpfFAii2 WmMBhxi5 DdfmmsiOI6 VnztO9gWDI GBSneBdnj9I dXO84KKorR AEvh49VNM ce7B03uyZN HQRUVJuiqT bWlfDaIU0K xPUXyWWo Kt- DMPfHdF94 NKzPmIxbVq VTC9pCxtjV S- UZ_2vMMk_I HwTThd- vS_Vruqv9JI G0uBKxJkAb 0Z3yvtGYrO WnGQDbBJy MIqjooQCh- L177KWzW4t cg3fbRe0hBp 7XALjtCa1gC 5V7KzZqrCW XOTKedRDJ pHgzyu6wOo JXxjkd_8Afz LiOsFH2s_Ld lwMnTnWUg qQjDQZWDk Zu- sAFHf56BfXb nZr0ZmH2Oy LwOpT34UV CelBWvhtQ3 N0iaYMpsrD YAQKC6Kg DwrfYtuw- DMdFF4m1N Tj0aw_F9pzZ dHOM2zsbUZ p9VqTJO6FA PbLRgzd74rf7 5Psg

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.

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

10 Executed at Redondo Beach, California, on October 19, 2023.

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Jan van Voorn