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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-00147

**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., Paramount Pictures Corporation, Sony Pictures  
25 Television, Inc., Universal Network Television LLC, Universal Television LLC, and  
26 Warner Bros. Entertainment, Inc. (“ACE Members”), each of which is a member of  
27 the Alliance for Creativity and Entertainment (“ACE”). ACE is a global coalition of  
28 leading content creators and on-demand entertainment services committed to

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

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

No	Domain	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	watchtheofficetv.com	The Office S07E01	watchtheofficetv.com/hd-episode-link/the-office-7x1/	The Office S07E02	watchtheofficetv.com/hd-episode-link/the-office-7x2/
2	bluf.online	The Batman	bluf.online/batman-torrent-2022.html	Encanto	bluf.online/encanto-torrent-2021-web-dl.html
3	cuevana.biz	The Batman	cuevana.biz/pelicula/414906/batman	Encanto	cuevana.biz/pelicula/568124/encanto
4	cuevana2espanol.net	The Batman	cuevana2espanol.net/movies/batman-414906	Encanto	cuevana2espanol.net/movies/encanto
5	cuevana8.com	The Batman	cuevana8.com/pelicula/414906/batman	Encanto	cuevana8.com/pelicula/568124/encanto
6	pelisplushd.to	The Batman	pelisplushd.to/pelicula/batman-2022	Encanto	pelisplushd.to/pelicula/encanto
7	watchbatesmotelonline.com	Bates Motel S03E01	watchbatesmotelonline.com/episodes/bates-motel-season-3-episode-1/	Bates Motel S03E03	watchbatesmotelonline.com/episodes/bates-motel-season-3-episode-3/
8	watchbrooklyn-nine-nine.com	Brooklyn Nine-Nine S03E01	watchbrooklyn-nine-nine.com/episode/brooklyn-nine-nine-3x1/	Brooklyn Nine-Nine S03E02	watchbrooklyn-nine-nine.com/episode/brooklyn-nine-nine-3x2/
9	watchonceuponatimeonline.com	Once Upon a Time S01E01	watchonceuponatimeonline.com/episode-watch/once-upon-a-time-1x1/	Once Upon a Time S01E02	watchonceuponatimeonline.com/episode-watch/once-upon-a-time-1x2/
10	maxseries.in	The Big Bang Theory S01E01	maxseries.in/big-bang-a-teoria-1x1/	Breaking Bad S03E01	maxseries.in/breaking-bad-a-quimica-do-mal-3x1/

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11	ekino- tv.pl	A Quiet Place	ekino- tv.pl/movie/show/ ciche-miejsce-fhd- a-quiet-place- 2018-lektor/23329	Encanto	ekino- tv.pl/movie/show/ nasze-magiczne- encanto-encanto- 2021- dubbing/31149
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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 to ACE Members, the motion picture copyright owners, under Title II of the Digital Millennium Copyright Act.

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 October 19, 2023.




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Jan van Voorn