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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-00184

**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 Corp., Sony Pictures
25 Animation, Inc., Universal City Studios Productions LLLP, and Warner Bros.
26 Entertainment, Inc. (“ACE Members”), each of which is a member of the Alliance
27 for Creativity and Entertainment (“ACE”). ACE is a global coalition of leading
28 content creators and on-demand entertainment services committed to supporting the

1 legal marketplace for video content and addressing the challenge of online piracy.
 2 The ACE Members, whether themselves or through subsidiaries and affiliates, own
 3 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	mixdrop.lol	Fast & Furious 9	mixdrop.lol/e/kn96m9mose91nl/	Spider-man: Into the Spider-Verse	mixdrop.lol/e/3nel7r9kilv719/
2	mixdrop.club	Fast & Furious 9	mixdrop.club/e/kn96m9mose91nl/	Spider-man: Into the Spider-Verse	mixdrop.club/e/3nel7r9kilv719/
3	uqload.com	Minions 2: The Rise of Gru	uqload.com/embed-6h1k3uzyaux7.html	Sonic the Hedgehog 2	uqload.com/embed-fuykeci43uyp.html
4	uqload.io	Minions 2: The Rise of Gru	uqload.io/embed-6h1k3uzyaux7.html	Sonic the Hedgehog 2	uqload.io/embed-fuykeci43uyp.html
5	uupbom.com	Cruella	uupbom.com/ymggr4c4kz40	Barbie	uupbom.com/u6khd59175uk
6	upbam.org	Cruella	upbam.org/ymggr4c4kz40	Barbie	upbam.org/u6khd59175uk

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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

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 December 21, 2023.

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Jan Van Voorn