

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.
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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-00186

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

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	iptv-sharing.org	ipfr.tv:8080	The Lion King	185.6.13.72:8080/movie/[REDACTED]/[REDACTED]/673913.mkv?token=HkZQBEVfRApGVggAVIMFBwUAUwFWVQZSU VYDUAB WAVIDVgAHBIMHVFESHE FDF0cAU10+C1cV XgVVVwtTAEgSFhYBSjpfU0QKRgY CVAdWF0kRRAgP VhVeAlRdC1ALVANXXEgaF V9TRAp GAQISA1 QXSRFV GRZWR QpSDjt WB0UN UwZHXh pHGhUJ XitUVQ5	The Da Vinci Code	185.6.13.72:8080/movie/[REDACTED]/[REDACTED]/673869.mkv?token=HkZOBVfRApGVgIVBwIFVA cFU1pOUVYEVI BRB1BS VIBcAgg ED1ROUwASHEF DF0cAU10+C1cV XgVVVwpUCkg SFhYBSj pfU0OK RgYCV AdWF0k RRAgPV hVeAlRd C1AKVg IVUEgaF V9TRAp GAOhV CFEXSR FVGRZ WROpS DitWB0 UNUwZ HXhpHG

No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				RDVFHC RJROB8V DUASRg hAZwFcB gsBTEV0 YSRxRhw SAVkXR wRHVU NYEQVT AIZGHkB QC0UNE RZBRww VJHVGH BIGSBdQ COBZDg wRDUZe CRIQThE NQzwXA UsRRFIH XQFCEIk SUxdJEV 0AGmxU C10MAV EWWgte EEdeGlQ UG0RdC 15ZF18R ahVaVE NYXUIIX x8=		hUJXitU VO5RD VFHCRJ ROB8V DUASRg hAZwFc BgsBTE V0YSRx RhwSAV kXRwR HVUNY EOVC1 BGHkB OC0UNE RZBRw wVJHV GHBIGS BdOC0B ZDgwRD UZeCRI OThENO zwXAUs RRFIHX OFCEIkS UxdJEV0 AGmxU C10MA VEWwg teEEdeGl OUG0Rd C15ZF18 RahVaV ENYXUI IXx8=

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.

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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 December 21, 2023.



Jan van Voorn