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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-00187

**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., Home Box Office, Inc., Netflix Worldwide
25 Entertainment, LLC, Paramount Pictures Corp., Sony Pictures Animation, Inc., 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	comando.la	The Batman	comando.la/batman-torrent-2022-dual-audio-dublado-4k-download-full-hd-assistir-online/#more-208558	Spider-man: Into the Spider-Verse	comando.la/homem-aranha-no-aranhaverso-torrent-2019-dual-audio-dublado-download/
2	filmesmega.co	The Batman	filmesmega.co/batman-dual-audio/	Spider-man: Into the Spider-Verse	filmesmega.co/homem-aranha-no-aranhaverso-dual-audio/
3	filmeviatorrents.org	The Batman	filmeviatorrents.org/the-batman-torrent-555-2/	Spider-man: Into the Spider-Verse	filmeviatorrents.org/homem-aranha-no-aranhaverso-torrent-444/
4	autoembed.to	A Quiet Place	autoembed.to/movie/imdb/tt6644200/	Frozen	autoembed.to/movie/imdb/tt2294629
5	bombuj.si	A Quiet Place	bombuj.si/online-film-tiche-misto	Encanto	bombuj.si/online-film-encanto-carovny-svet
6	watchgameofthrones.co	Game of Thrones S5E02	watchgameofthrones.co/episodes/game-of-thrones-5x2/	Game of Thrones S03E03	watchgameofthrones.co/episodes/game-of-thrones-3x3/

1	7	animefire.vip	Food Wars! S01E01	animefire.vip/animes/shokugeki-nosouma/1	Summer Time Rendering S01E01	animefire.vip/animes/summertime-render/1
2	8	gdrivelatino.net	The Batman	gdrivelatino.net/the-batman-2022-web-dl-x265-1080p-hdr10-latino-ingles/	Spider-man: Into the Spider-Verse	gdrivelatinohd.net/spider-man-un-nuevo-universo-2018-web-dl-720p-latino-ingles/
3	9	animesonline.in	Tokyo Revengers S02E01	animesonline.in/video/239742	Mob Psycho 100 S01E02	animesonline.in/video/14954
4	10	cuevana-3.id	The Batman	cuevana-3.id/ver-pelicula/batman-414906	Spider-man: Into the Spider-Verse	cuevana-3.id/ver-pelicula/spider-man-un-nuevo-universo
5	11	compucalitiv.org	Elvis	compucalitiv.org/elvis-2022-hd-1080p-720p-latino-dual	Spider-man: Into the Spider-Verse	compucalitiv.org/spider-man-nuevo-universo-2018-hd-1080p-720p-latino/
6	12	cinecalidad.com.mx	Encanto	cinecalidad.com.mx/ver-pelicula/encanto/	Spider-man: Into the Spider-Verse	cinecalidad.com.mx/ver-pelicula/spider-man-un-nuevo-universo/
7	13	redecanais.zip	Encanto	redecanais.zip/turning%20red-dublado-2022-1080p_f1362d98a.html	Spider-man: Into the Spider-Verse	redecanais.zip/homem-aranha-sem-volta-para-casa-dublado-2019-1080p_93573aeb.html
8	14	megatorrentsx.com.br	Encanto	megatorrentsx.com.br/baixar-encanto-dublado-torrent-download2/	Spider-man: Into the Spider-Verse	megatorrentsx.com.br/homem-aranha-no-aranhaverso-torrent-2019-dublado-download/
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3	15	megatorrentsx.com	Encanto	megatorrents.com/baixar-encanto-dublado-torrent-download2/	Spider-man: Into the Spider-Verse	megatorrentsx.com/homem-aranha-no-aranhaverso-torrent-2019-dublado-download/
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6	16	limontorrents.com	The Batman	limontorrents.com/batman-2/	Encanto	limontorrent.com/encanto/
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8	17	mmfilmes.me	Encanto	mmfilmes.me/encanto/	Spider-man: Into the Spider-Verse	mmfilmes.me/homem-aranha-no-aranhaverso-hd/
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10	18	gogoanime2.org	Romantic Killer S01E01	gogoanime2.org/watch/romantic-killer/1	Hi Score Girl S01E01	gogoanime2.org/watch/high-score-girl/1
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12	19	9anime2.com	Romantic Killer S01E01	9anime2.com/watch/romantic-killer/1	Hi Score Girl S01E01	9anime2.com/watch/high-score-girl/1
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14	20	animepahe.ru	Batman Ninja	animepahe.ru/play/a8043800-b5ec-a254-fcf7-ba730ba2d44c/682d56e0ede27066331a78e2c3117dc5059a2cc6dd7ab7b2a6366795f3d17304	Spirited Away	animepahe.ru/play/c8d60520-f590-5f37-be46-a18c644b907f/4f74312c9fd0112a65fecdlb4e5b3087522e5dff3f762fdc7667e0492fe487d8
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20	21	animeflix.live	Yasuke S01E01	animeflix.live/watch/yasuke-episode-1/	Summer Time Rendering S01E01	animeflix.live/watch/summer-time-render-episode-1
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22	22	bstsrs.one	Big Bang Theory S12E01	bstsrs.one/show/the-big-bang-theory-s12e01/season/12/episode/1	Black-ish S04E01	bstsrs.one/show/black-ish-s04e01/season/4/episode/1
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25	23	kickassanime.am	JoJo's Bizarre Adventure: Diamond Is Unbreakable S01E01	kickassanime.am/jojos-bizarre-adventure-diamond-is-unbreakable-	Summer Time Rendering S01E01	kickassanime.am/summer-time-rendering-2872/ep-1-732393
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25	adjaranet.to	Frozen II	adjaranet.to/filmebi/10405-gayinuli-2.html	Mortal Kombat	adjaranet.to/filmebi/15560-sasikvdilobrdzola-ka.html

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 December 21, 2023.



 Jan van Voorn