

1 OLIVER BROWN (State Bar No. 335952)  
Oliver.Brown@mto.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  
8

9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
11

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

Case Number: 2:24-mc-00041

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

14  
15  
16  
17  
18  
19  
20 I, Jan van Voorn, the undersigned, declare that:

21  
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., Disney Enterprises, Inc., Paramount  
25 Pictures Corp., Sony Pictures Animation, Inc., and Warner Bros. Entertainment, Inc.  
26 (“ACE Members”), each of which is a member of the Alliance for Creativity and  
27 Entertainment (“ACE”). ACE is a global coalition of leading content creators and  
28 on-demand entertainment services committed to supporting the legal marketplace

1 for video content and addressing the challenge of online piracy. The ACE  
 2 Members, whether themselves or through subsidiaries and affiliates, own the  
 3 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	Infringing Website	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
1	cccandbox.com	The Batman	89.105.207.43/live/play/ZFU0eVNicDJZM1lwVORrMIVVTnVTMHRHY1hCRVFWTINTSE5PTVM4dmFEZzJPVU5yZWxFNVVqaE5VVDA9/160603	A Quiet Place	89.105.207.43/live/play/UWtnMloyNUxSMIZpYURSa1JV VmtRbTlhYWsxVk16bG9RMEUzUWxC MVExTjNjRzU1S3pKaVZHcGpaejA9/164634
2	multicanais.com	Supernatural S03E03	embedflix.net/tv/warner-channel	2012 (2009)	embedflix.net/tv/space
3	redcanaistv.zip	The Nun	sinalpublico.com/player3/ch.php?canal=hbo	Jack Reacher: Never Go Back	sinalpublico.com/player3/ch.php?canal=teleci neaction
4	MagisTv v5.5.2 (application) magistv.video/#descargar	Mulan (Live Action)	38.170.200.179:17444/vod/666AAAFE80324044B70042F30EACC81F_media.mp4?content_auth=Rm_vZXTDWxjKva	Spider-man: Into the Spider-Verse	23.236.235.178:8680/vod/3CEBC1439FDA448085D3433D1069534B_media.mp4?content_auth=Rm_vZXTDWxjKva

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

	(download site)		4G_NVwzPp7 NuYNyDjClnB JtwJ6WtnawQ qf7vtE_QDLD 9ZAzs9WD1J C7j22Qwmgdl pGzX8v50c7eJ Cr1gmS- vW6uXhcfR_o N1bUemzc5D EGlQEcdwM HzPvPF3QNB D_5gqNsuQCd C8J1HX1Bx3 QquJHe_Vxm POxK8FgQGz ubGIHRkLKP QkZ62FoJnbpc Fw6aXbfJ30I2 Yw0Syo0O- RdIN6EgKwY 2orDk3xlXsVF WfVZ6TYsfH esaXHSH_Vp9 - UELRsBE8A1 GnFODv48he X2eT4- FW9dzPVkT4 xVt45LULQF QC4e_MmLE HTs61- vzLORLBUJJlq wg6Q1vQR- riOxqMc469ot 367H457TKD FheocqTUYnT 2EMv&content _license=1wK Y2xwXG3Pb MeOT8q8PtG		4G_NVwzJZQ GNGR1gZ1a8 FpOwRDJqsSf Qbwo9t7KssM _bBFoE- ZksF9bln7Lwf O6RnN- mQiURWp6- rnaLkrcl81Ab X4RsYimfwV h- AzJaGUBmqi3 pyENYNGPW HP_qvfuoI69O Qf4O0SBSG08 pSsvgIUre9f7 OStdATQ2rCv R_WbTdmMvI o3bT_Fx9L2j7 UeO0PIIak- NLyeoQbJ6qC 2- MO_2uHuwD DH4iAmKeah vgXNGX84aZ 9RMiCJQSj87 oEaK2M1HM7 OFaGspPWOy eT88IKuRfjoCl G6U2A03BVC s33oth5KnRM YI00dC_6Toz wg4MDfGv_Q y- oEF7kNoNb2S G5mCR3G9C wWRKiOEwL bRI9LAEbmT v2C&content_1 icense=1wKY2 xwXG3PbMeO
--	-----------------	--	---	--	--

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

			CTe1WcvBxa UhnAIPNZsiO p3AcL6rgrq0k gVWy11HCNi e8FpVqKdl0e- _r7SfMufBW3 k00JGCVKj7B W7RhaEoAPO F53A5pvMqTf DkGgtkYB4x2 4PZjKJVseZC KvVaT2nCSU 2bkV8s3oj0wq 6pjC2aRQdi1P c29R0d_fwuW i- qi3&host=38.1 70.200.179:174 44		T8q8PtGCTe1 WcvBxaUhnA1 PNZsiagQNTv gudUvSQ8om2 LnQyglwLJFy 7bkH644tbevlv 7Hig7pfcLhQ M9m2qxpwrE CNL7B- 82W651fy6aY 3YXLxEKEdzl Frk2Klwi9jJig pOweI- oV9nxbwW_o pnJIE- RptvFlpnDt9ca yIUQ4F7SEBS R&host=23.23 6.235.178:8680
5	Brasil TV v2.28.0 (application)  brasiltvnewa pk.com/ (download site)	Mulan (Live Action)	64.31.18.58:60 63/vod/4DECB 138F48D4EA2 AF45007130C 9B115_media. mp4?content_a uth=Rm_vZXT DWxjKva4G_ NVwzkMuLv3 EmcD8Cllr72_ wIfcFb8yoABg iFyyG0zdhvgij ZHy9JSUY7G ArG3ARufVNr djsrXs5E- 3uZuTPPgwhf UT6DzGwFPC ObaieW6zyJc Yevd_NyFL1f ZUKIw0iRA0 G73OVPQK1 m4XaUvbXhy	Spider- man: Into the Spider- Verse	64.31.18.58:60 63/vod/DBDB 02625F724488 BE3A12649D6 B456F_media. mp4?content_a uth=Rm_vZXT DWxjKva4G_ NVwzkMuLv3 EmcD8Cllr72_ wIfcFb8yoABg iFyyG0zdhvgij fMzp2zxD7m YW8_bO2SE WgmqsHP2yV a6Vy0ePnvlM Md9h3BrqVdL 1m5GaoEwZh mFZEUs5VLd ull1C4gckXm7 8OorBRxI4- XaKTjJm663o

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

			xKdGf3jH6iM W0gS2NJ7Es mFMe- 7z5n4sOlco4E 0UJeDAkpYar MIFTotMKsb0 - 50WqGaQoxA WXUqQJ6nS MyuE5urudyQ qlLxmU4ewsY 8ZvsOgAzKE LLV6RlksFjZ5 ulW3a0THJg 5f- HhcL13xjbCK 3cmNQZ4upr AaTsg4j6dEsG fiC5WtU3ic- Sb1b6FuJiTaz ZJ- S6PokpJV6IbI mcYuFJ05bsI0 hDOP4XyHE1 rNmuY757b&c ontent_license =1wKY2xwX G3PbMeOT8q 8PtHcfEb_1IK- 6v7miXyFwxf G- AGIOOGe4hh 1yGkUs5DgH LIy1sJV4wKL dUq0AnlmcR oTfvK5Wg_sf baE2C5_B_pz v5Y1zFbO6XJ lcFmKN17q0v AVrbvwv4C3- Ofi-EKj-		zZ_cnACQILt RepW9cgOXU z2- yBEn7ukfXcW u_LTHjmUXV WUY3ywwz9R7 f2rRF4jF4GSH OJwHuihO9By G4og0Ga_1Z1t KQnG0_TpPjn km_xPv- uD4Um7G8Lp z_EEnECs2jGa FKocfkJpXfT U849PCtvYTb oJ- LkExvHRVGw dbyyh6uBv_6- ZUDh2lw7fPQ FcqqCb8A7eO E- 3PRViuq_3kN m1OF19Zvr5I U_2OXeJ93Mf QFxW&conten t_license=1wK Y2xwXG3Pb MeOT8q8PtHc fEb_1IK- 6v7miXyFwxf GPq2eMZD9y h- hxhqB4wV3pj NkQ3DhJ3QZ pmsuwHASXp jOXnwCo5Xp OgR1H6h_9uu ASZ7GriJf2ryo G0NekJGcsGT 2fPhtx9tKbbht RbVDeSNto9r
--	--	--	--	--	--

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28


			eFcHka_DRIPC ZOAUmabZjt1 NYo_2bcQ0- UFrdjATf2s&h ost=64.31.18.5 8:6063		3yllFxAAR8ihH sldtYnsFghM_ 3jKr4GHRRd9 L4n&host=64. 31.18.58:6063
6	My Family Cinema v3.1.1 (application)  myfamilycin ema.com/en/ download- my-family- cinema/ (download site)	Encanto	myfamilycine ma.com	Spider- man: Into the Spider- Verse	myfamilycine ma.com
7	MagisTv v6.2.0 (application)  magis- tv.app/apk/ (download site)	Encanto	magis-tv.app	Spider- man: Into the Spider- Verse	magis-tv.app
8	TVExpress v4.3.0 (application)  vendasviolet a.com/pricin g-table/ (download site)	The Big Bang Theory S06E22	vendasvioleta.c om	Gran Turismo	vendasvioleta.c om

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

11           Executed at Redondo Beach, California, on March 25, 2024.

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



---

Jan Van Voorn