

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.
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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 TONIC DOMAINS CORPORATION

Case Number: 2:24-mc-00044

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

1 The ACE Members, whether themselves or through subsidiaries and affiliates, own
 2 the 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 Tonic
 5 Domains Corporation to disclose the identities, including names, physical addresses,
 6 IP addresses, telephone numbers, e-mail addresses, payment information, account
 7 updates and account histories of the users operating the following websites:

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No	Infringing Website	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
1	thetvapp.to	Barbie	e5.thetvapp.to/hls/HBOEast.m3u8?token=dVHdhfWhxhaQcUCuPYQwbg&expires=1706949145	BlacKkKlansman	v2.thetvapp.to/hls/FXMovieChannel.m3u8?token=Q5zhZmgvCMHowZ2AcgjqQ&expires=1706925922

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16 3. The purpose for which this subpoena is sought is to obtain the identities
 17 of the individuals assigned to these websites who have exploited ACE Members’
 18 exclusive rights in their copyrighted motion pictures without their authorization.
 19 This information will only be used for the purposes of protecting the rights granted
 20 to ACE Members, the motion picture copyright owners, under Title II of the Digital
 21 Millennium Copyright Act.

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

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



Jan Van Voorn