

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

In Re DMCA Subpoena to Facebook, Inc.	X : : : : : : : : : : X	<u>Case No. 7:21-mc-447</u> Declaration of Paul D. Polidoro in Support of Watch Tower Bible and Tract Society’s Request to the Clerk for Issuance of Subpoena to Facebook, Inc., Pursuant to 17 U.S.C. § 512(h) to Identify Alleged Infringer
---------------------------------------	--	--

PAUL D. POLIDORO, counsel of record for Petitioner Watch Tower Bible and Tract Society of Pennsylvania (hereinafter “Watch Tower”) in the above-referenced matter, hereby declares as follows:

1. I am authorized to act on behalf of Watch Tower.
2. I submit this declaration in support of Watch Tower’s request for issuance to Facebook, Inc. of a subpoena, pursuant to the Digital Millennium Copyright Act (“DMCA”) 17 U.S.C. § 512(h) (hereinafter “DMCA Subpoena”), to identify the user identified as: “Rodrigo Viana”.
3. Pursuant to 17 U.S.C. § 512 (c)(3)(A), Watch Tower submitted a notification to Facebook, Inc. identifying the infringing content posted by the aforementioned user and providing the information required by 17 U.S.C. § 512 (c)(3)(A). A true and accurate copy of the submitted notification is attached hereto as Exhibit 1.
4. The purpose for which this DMCA Subpoena is sought is to obtain the identity of an alleged infringer or infringers and such information will only be used for the purpose of protecting Watch Tower’s rights under title 17 U.S.C. §§ 100, *et. seq.*

I declare under penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct. Executed this 19th day of May 2021.

/s/ Paul D. Polidoro
 Paul D. Polidoro
 Associate General Counsel

SDNY Bar No. PP2509
WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA
Legal Department
200 Watchtower Drive
Patterson, NY 12563-9204
Telephone: 845-306-0711
Facsimile: 845-306-0709
Email: inboxLGLipg@jw.org
Attorney for Plaintiff

EXHIBIT 1



From: InboxLGLIPG
 Sent: Wednesday, May 12, 2021 11:00 PM
 To: 'ip@fb.com'
 Subject: Notice of Copyright Infringement by Facebook Page: PODEROSOS PELA FÉ

Dear Sir/Madam:

I represent Watch Tower Bible and Tract Society of Pennsylvania (“Watch Tower”). It has come to our attention that you are reproducing and distributing Watch Tower’s intellectual property illegally and without authorization.

Below is the information needed for you to identify the unauthorized display of Watch Tower’s intellectual property.

Name of Infringing Website: PODEROSOS PELA FÉ

Description of Work Being Infringed: My company, organization or client’s video and music (not from Facebook)

	Title of Video	Link to Infringing Video on YouTube	Link to Lawful Display of Material on Watch Tower’s Site
1	With Eyes of Faith	https://www.facebook.com/100058666446308/videos/195780135720867	https://www.jw.org/en/library/music-songs/original-songs/with-eyes-of-faith/

The material(s) include copyright notice(s) indicating Watch Tower’s ownership of the material(s).

We hereby request that you take all steps necessary to immediately remove the infringing materials from your website. Advise us in writing within ten (10) days of the date of this letter whether or not you will take the requested action.

I have a good faith belief that use of the materials in the manner complained of is not authorized by the copyright owner, its agent, or the law.

I hereby state under penalty of perjury that this information is accurate, and that I am authorized to act on behalf of the owner of the infringed materials.

Sincerely,

Paul Polidoro

Paul Polidoro
 Associate General Counsel

Intellectual Property Owner: Watch Tower Bible and Tract Society of Pennsylvania
Company: Watch Tower Bible and Tract Society of Pennsylvania
Address: 200 Watchtower Drive
City, State, and Zip: Patterson, NY 12563
Name and Title: Paul Polidoro, Associate General Counsel
Attorney Address: 200 Watchtower Drive, Patterson, NY 12563

Email Address: InboxLGLCopyright@jw.org

Telephone: 845-306-1000