

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

In Re 17 U.S.C. § 512(h) Subpoena to

CLOUDFLARE, INC.

Case Number: 2:20-mc-00119

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

I, Jan van Voorn, the undersigned, declare that:

1. I am Executive Vice President and Chief of Global Content Protection for the Motion Picture Association, Inc., on behalf of Amazon Content Services LLC, Columbia Pictures Industries, Inc., Disney Enterprises, Inc., Netflix Studios, LLC, Paramount Pictures Corp., and Universal City Studios Productions LLLP (“ACE Members”) who are members of the Alliance for Creativity and Entertainment (“ACE”), a global coalition of leading content creators and on-demand entertainment services committed to supporting the legal marketplace for video content and addressing the challenge of online piracy. The ACE Members, whether themselves or through subsidiaries and affiliates, own the copyrights in the below referenced copyrighted works.

2. The ACE Members (via the Motion Picture Association, Inc.) are requesting issuance of the attached proposed subpoena that would order Cloudflare, Inc. to disclose the identities, including names, physical addresses, IP addresses, telephone numbers, e-mail

addresses, payment information, account updates and account histories of the users operating the websites listed in the attached **Exhibit A**.

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 works without their authorization. This information will only be used for the purposes of protecting the rights granted under Title 17, United States Code.

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 September 21, 2020.



Jan van Voorn

EXHIBIT A

Website	Sample 1 Infringing Title	Sample 1 Infringing URL	Sample 2 Infringing Title	Sample 2 Infringing URL
yts.mx	Frozen II	https://yts.mx/movies/frozen-ii-2019	Beautiful Boy	https://yts.mx/movies/beautiful-boy-2018
pelisplus.me	Frozen II	https://pelisplus.me/pelicula/frozen-2/p003/	Beautiful Boy	https://pelisplus.me/pelicula/siempre-seras-mi-hijo/
1337x.to	Frozen II	https://1337x.to/torrent/4292403/Frozen-II-2019-1080p-WEBRip-5-1-YTS-YIFY/	Beautiful Boy	https://1337x.to/torrent/3501672/Beautiful-Boy-2018-WEBRip-720p-YTS-YIFY/
seasonvar.ru	Grey's Anatomy: Season 15	http://seasonvar.ru/serial-19918-Anatomiya_strasti-15-sezon.html	Grey's Anatomy Season 7 Episode 11	http://seasonvar.ru/serial-1564--Anatomiya_strasti---0007--sezon.html
cuevana3.io	Frozen II	https://cuevana3.io/24388/frozen-2	Beautiful Boy	https://cuevana3.io/8820/beautiful-boy
kinogo.by	Frozen II	https://kinogo.by/22116-frozen-ii_2019_30-12.html	Beautiful Boy	https://kinogo.by/19104-beautiful-boy_2018.html
thepiratebay.org	Frozen II	https://thepiratebay.org/description.php?id=36054941	Beautiful Boy	https://thepiratebay.org/description.php?id=28813637
lordfilm.cx	Frozen II	https://my.lordfilm.to/36582-holodnoe-serdce-2.html	Beautiful Boy	https://my.lordfilm.to/4501-krasiviy-malchik.html
swatchseries.to	The Romanoffs Season 1 Episode 1	https://www1.swatchseries.to/episode/the_romanoffs-2_s1_e1.html	Grey's Anatomy Season 7 Episode 11	https://www1.swatchseries.to/episode/greys_anatomy_s7_e11.html
eztv.io	The Romanoffs Season 1 Episode 1	https://eztv.io/ep/1294647/the-romanoffs-s01e01-xvid-afg/	Grey's Anatomy Season 7 Episode 11	https://eztv.io/ep/24943/greys-anatomy-s07e11-hdtv-xvid-lol/
123movies.la	Charlie's Angels	https://ww3.123movies.la/movie/charlies-angels-1-z0dggvy	Beautiful Boy	https://ww3.123movies.la/movie/beautiful-boy-1-z95pq24
megadede.com	Frozen II	https://www.megadede.com/peli/frozen-ii	Beautiful Boy	https://www.megadede.com/peli/beautiful-boy-1
sorozatbarat.online	Grey's Anatomy: Season 1 Episode 1	https://www.sorozatbarat.online/video/series/36/A_Grace_klinika_online_sorozat/01_evad	Grey's Anatomy Season 7 Episode 11	https://www.sorozatbarat.online/video/series/36/A_Grace_klinika_online_sorozat/07_evad
cinecalidad.is	Frozen II	https://www.cinecalidad.is/pelicula/frozen-ii-2019-online-descarga/	Beautiful Boy	https://www.cinecalidad.is/pelicula/beautiful-boy-siempre-seras-mi-hijo-2018-online-descarga/

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Website	Sample 1 Infringing Title	Sample 1 Infringing URL	Sample 2 Infringing Title	Sample 2 Infringing URL
limetorrents.info	Frozen II	https://www.limetorrents.info/Frozen-II-2019-HDRip-Portablius-torrent-15115353.html	Beautiful Boy	https://www.limetorrents.info/search/all/Beautiful-Boy/
cinecalidad.to	Frozen II	https://www.cinecalidad.to/pelicula/frozen-ii-2019-online-descarga/	Beautiful Boy	https://www.cinecalidad.to/pelicula/beautiful-boy-siempre-seras-mi-hijo-2018-online-descarga/
kimcartoon.to	Frozen II	https://kimcartoon.to/Cartoon/Frozen-II	Despicable Me	https://kimcartoon.to/Cartoon/Despicable-Me/Movie?id=2130
tamilrockers.ws	The Fate Of The Furious	https://tamilrockers.ws/index.php/topic/25920-fast-furious-octalogy-2001-to-2017720p-new-bdrips-tamil-telugu-hindi-eng-x264-10gb-esubs/	Spider-Man: Homecoming	https://tamilrockers.ws/index.php/topic/25167-spider-man-hexalogy-2002-to-2017720p-bdrips-tamil-telugu-hindi-eng-x264-66gb-esubs/
cima4u.io	Frozen II	http://cima4u.io/%d8%aa%d8%ad%d9%85%d9%8a%d9%84-%d9%88%d9%85%d8%b4%d8%a7%d9%87%d8%af%d8%a9-%d9%81%d9%8a%d9%84%d9%85-frozen-ii-2019-%d9%85%d8%af%d8%a8%d9%84%d8%ac/	Beautiful Boy	http://cima4u.io/%d9%85%d8%b4%d8%a7%d9%87%d8%af%d8%a9-%d9%81%d9%8a%d9%84%d9%85-beautiful-boy-2018-%d9%85%d8%aa%d8%b1%d8%ac%d9%85/
fullhdfilmizlesene.com	Triple Frontier	https://www.fullhdfilmizlesene.com/aksiyon-film-izle/triple-frontier-izle/	The Photograph	https://www.fullhdfilmizlesene.com/film/fotograf-the-photograph/
yggtorrent.si	Frozen II	https://www2.yggtorrent.si/torrent/filmvid%C3%A9o/animation/566850-frozen+ii+2019+bluray+1080p+avc+dts-hd+ma7+1-mteam?attempt=1	Beautiful Boy	https://www2.yggtorrent.si/torrent/filmvid%C3%A9o/film/415404-beautiful+boy+2018+vostfr+720p+bluray+x264+ac3-fist
time2watch.io	Frozen II	https://time2watch.io/film/12419/la-reine-des-neiges-ii	Beautiful Boy	https://time2watch.io/film/11238/my-beautiful-boy
online-filmek.me	Frozen II	https://online-filmek.me/film/26346-jegvarazs-2	Beautiful Boy	https://online-filmek.me/film/24934-csodalatos-fiu
lordfilms-s.pw	Triple Frontier	http://ad.lordfilms-s.pw/46782-film-trojnaja-granica-2019.html	The Fate Of The Furious	http://ad.lordfilms-s.pw/37977-film-forsazh-8-2017.html

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extreme-down.video	Frozen II	https://www.extreme-down.video/films-new-hd/new-full-bluray-3d/71430-la-reine-des-neiges-ii-multi-avec-truefrench-full-bluray-3d.html	Beautiful Boy	https://www.extreme-down.video/films-new-ultrahd/new-webrip-4k/76347-my-beautiful-boy-multi-avec-truefrench-web-4k.html
streamkiste.tv	Frozen II	https://streamkiste.tv/movie/die-eiskoenigin-2-2019-4520988	Beautiful Boy	https://streamkiste.tv/movie/beautiful-boy-2018-1226837
dontorrent.org	Frozen II	https://dontorrent.org/pelicula/21740/Frozen-II-4K	Beautiful Boy	https://dontorrent.org/pelicula/21052/Beautiful-Boy-Siempre-sers-mi-hijo
kinozal.tv	Frozen II	http://kinozal.tv/details.php?id=1760107	Beautiful Boy	http://kinozal.tv/details.php?id=1685707
fanserial.net	Grey's Anatomy Season 7 Episode 11	http://fanserial.net/7829-anatomiya-strasti-7-sezon-11-seriya-bezoruzhnyy.html	How to Get Away with Murder: Season 5 Episode 11	http://fanserial.net/39770-kak-izbezhat-nakazaniya-za-ubiystvo-5-sezon-11-seriya-byt-muchenikom.html
5movies.to	Frozen II	https://5movies.to/movie/frozen-ii-103936/	Beautiful Boy	https://5movies.to/movie/beautiful-boy-89573/
altadefinizione.group	Frozen II	https://altadefinizione.fitness/frozen-2-il-segreto-di-arendelle-streaming-4k/	Beautiful Boy	https://altadefinizione.fitness/beautiful-boy-streaming-4k/
cpasmieux.org	Dolittle	http://www.cpsmieux.club/filmstreaming/comedie/5851-le-voyage-du-dr-dolittle.html	Beautiful Boy	http://www.cpsmieux.org/filmstreaming/drame/1364-my-beautiful-boy.html
primewire.li	Frozen II	https://www.primewire.li/movie/904598-watch-frozen-ii	Beautiful Boy	https://www.primewire.li/movie/325110-watch-beautiful-boy
primewire.ag	Sonic the Hedgehog	https://www.primewire.ag/movie/1166885-watch-sonic-the-hedgehog	Charlie's Angels (2019)	https://primewire.vc/movie/60112-watch-charlies-angels
primewire.vc	Sonic the Hedgehog	https://www.primewire.vc/movie/1166885-watch-sonic-the-hedgehog	Charlie's Angels (2019)	https://primewire.ag/movie/60112-watch-charlies-angels
series9.to	Frozen II	https://www2.series9.ac/film/frozen-ii/watching.html?ep=0	Beautiful Boy	https://www2.series9.ac/film/beautiful-boy
europixhd.io	Frozen II	https://europixhd.io/watch-online-movie/frozen-ii-2019-online-free-hd-with-subtitles-europix	Beautiful Boy	https://europixhd.io/watch-online-movie/beautiful-boy-2018-online-free-hd-with-subtitles-europix
oxtorrent.pw	Frozen II	https://www.oxtorrent.cc/torrent/7324/la-reine-des-neiges-2-multi-4k-ultra-hd-x265-2020	Dolittle	https://www.oxtorrent.cc/torrent/10056/le-voyage-du-dr-dolittle-truefrench-dvdrip-2020

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pirateproxy.voto	Frozen II	https://pirateproxy.cloud/description.php?id=36054941	Beautiful Boy	https://pirateproxy.cloud/description.php?id=29384500
rarbgmirror.org	Frozen II	http://rarbgmirror.org/torrent/23g5ijp	Beautiful Boy	http://rarbgmirror.org/torrent/dv52j1x
rlsbb.ru	Frozen II	http://rlsbb.ru/frozen-ii-2019-3d-1080p-bluray-x264-guacamole/	Beautiful Boy	http://rlsbb.ru/beautiful-boy-2018-2160p-web-dl-hdr-ddp5-1-h265-cmrg/
gnula.se	Grey's Anatomy Season 7 Episode 11	https://gnula.se/capitulo/anatomia-de-grey/7/11/	The Romanoffs Season 1 Episode 1	https://gnula.se/capitulo/los-romanov-the-romanoffs/1/01/
rarbgproxied.org	Frozen II	https://rarbgproxied.org/torrent/23g5ijp	Beautiful Boy	https://rarbgproxied.org/torrent/dv52j1x
seriespapaya.nu	Grey's Anatomy Season 7 Episode 11	https://www2.seriespapaya.nu/ver/anatomia-de-grey/temporada-7/capitulo-11.html	The Romanoffs Season 1 Episode 1	https://www2.seriespapaya.nu/ver/the-romanoffs/temporada-1/capitulo-1.html
tirexo.com	Frozen II	https://www.tirexo.pro/animes/524204-la-reine-des-neiges-ii-WEB-DL%20720p-VO.html	Beautiful Boy	https://www.tirexo.pro/films-gratuit/462729-my-beautiful-boy-WEB-DL%201080p-French.html
cb01.events	Frozen II	https://cb01.events/frozen-2-il-segreto-di-arendelle-hd-3d-2019/	Beautiful Boy	https://cb01.events/beautiful-boy-hd-2019/
kinox.to	Frozen II	https://ww2.kinox.to/Stream/Frozen_2.html	Beautiful Boy	https://ww2.kinox.to/Stream/Beautiful_Boy-1.html
filmstoon.pro	Frozen II	https://ww.filmstoon.icu/film/anime/259837-la-reine-des-neiges-2-fro.html	Beautiful Boy	https://ww.filmstoon.icu/film/drame/252193-my-beautiful-boy-beautifu.html
descargasdd.net	Lady and the Tramp	https://descargasdd.net/showthread.php?t=140432	Maleficent: Mistress of Evil	https://descargasdd.net/showthread.php?t=128408