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

12 In Re 17 U.S.C. § 512(h) Subpoena to

Case Number: 2:21-mc-00002

13 TONIC DOMAINS CORPORATION
14

**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 Columbia Pictures Industries, Inc., Disney Enterprises, Inc., Universal City
25 Studios Productions LLLP, and Warner Bros. Entertainment, Inc. (“ACE
26 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 Tonic
6 Domains Corporation, Inc. to disclose the identities, including names, physical
7 addresses, IP addresses, telephone numbers, e-mail addresses, payment information,
8 account updates and account histories of the users operating the websites listed in
9 the attached **Exhibit A**.

10 3. The purpose for which this subpoena is sought is to obtain the identities
11 of the individuals assigned to these websites who have exploited ACE Members'
12 exclusive rights in their copyrighted motion pictures without their authorization.
13 This information will only be used for the purposes of protecting the rights granted
14 to ACE Members, the motion picture copyright owners, under Title II of the Digital
15 Millennium Copyright Act.

16
17 I declare under penalty of perjury under the laws of the United States of
18 America that the foregoing is true and correct to the best of my knowledge,
19 information or belief.

20 Executed at Redondo Beach, California, on January 7, 2021.

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Jan van Voorn

EXHIBIT A

Website	Sample 1 Infringing Title	Sample 1 Infringing URL	Sample 2 Infringing Title	Sample 2 Infringing URL
1377x.to	Trolls World Tour	https://1377x.to/torrent/4396982/Trolls-World-Tour-2020-1080p-WEBRip-5-1-YTS-YIFY/	Tenet	https://1377x.to/torrent/4692491/Tenet-2020-1080p-HDRip-x264-AAC2-0-SHITBOX/
cinecalidad.to	Frozen II	https://cinecalidad.to/pelicula/frozen-ii-2019-online-descarga/	Birds of Prey (and the Fantabulous Emancipation of One Harley Quinn)	https://cinecalidad.to/pelicula/aves-de-presa-y-la-fantabulosa-emancipacion-de-una-harley-quinn-2020-online-descarga/
f2movies.to	Bloodshot	https://f2movies.to/watch-movie/bloodshot-60598.1597482	SPIDER-MAN: HOMECOMING	https://f2movies.to/movie/spiderman-homecoming-19743
myflixe.to	Dolittle	https://myflixe.to/watch-movie/dolittle-59091.1602280	Tenet	https://myflixe.to/watch-movie/tenet-63301.3115135
onionplay.to	Frozen II	https://onionplay.to/movies/watch-frozen-ii-2019-online/	Dolittle	https://onionplay.to/movies/watch-dolittle-2020-online/
streamplay.to	Tenet	https://streamplay.to/thux7h0cju9u	Bloodshot	https://streamplay.to/p0uv1t8sw4qq
tinyzonetv.to	SPIDER-MAN: HOMECOMING	https://tinyzonetv.to/watch-movie/watch-spiderman-homecoming-2017-free-19743.1613339	Trolls World Tour	https://tinyzonetv.to/watch-movie/watch-trolls-world-tour-2020-free-60624.1706666
upstream.to	Frozen II	https://upstream.to/gd8xrn2r25eb	Trolls World Tour	https://upstream.to/bslpezrrfoke
yesmovieshd.to	Tenet	https://yesmovieshd.to/film/tenet/watching.html?ep=0	Birds of Prey (and the Fantabulous Emancipation of One Harley Quinn)	https://yesmovieshd.to/film/birds-of-prey/watching.html?ep=0