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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 CLOUDFLARE, INC.

Case Number: 2:23-mc-00058

**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 Disney Enterprises, Inc., Paramount Pictures Corp., 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 Cloudflare,
5 Inc. to disclose the identities, including names, physical addresses, IP addresses,
6 telephone numbers, e-mail addresses, payment information, account updates and
7 account histories of the users operating the following websites:

No	Domain	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	thesoap2day.com	Harry Potter and the Sorcerer's Stone	thesoap2day.com/movies/harry-potter-and-the-chamber-of-secrets/	Strange World	thesoap2day.com/movies/strange-world-11XYQA/
2	tor.cat	Sonic the Hedgehog 2	dontorufwmbqhnoe2wvko5ynis6axf7bqod6wkmdvxmjyek64tantlqd.onion/pelicula/25278/Sonic-2-La-pelcula	Cruella	dontorufwmbqhnoe2wvko5ynis6axf7bqod6wkmdvxmjyek64tantlqd.onion/pelicula/23106/Cruella
3	thepiratebay.org	Sonic the Hedgehog 2	thepiratebay.org/description.php?id=5791643	Cruella	thepiratebay.org/description.php?id=46243065
4	cuevana2.biz	The Batman	cuevana2.biz/pelicula/batman	Encanto	cuevana2.biz/pelicula/encanto
5	cuevana3.ai	The Batman	cuevana3.ai/55046/the-batman	Encanto	cuevana3.ai/51844/encanto
6	cuevana3.mu	The Batman	cuevana3.mu/pelicula/the-batman-2022/	Encanto	cuevana3.mu/pelicula/encanto-2021-3/
7	compucalitiv.com	The Batman	compucalitiv.com/batman-2022-hd-1080p-720p-latino/	Encanto	compucalitiv.com/encanto-2021-hd-1080p-720p-latino-dual/

1	8	seriesfli x.is	The Big Bang Theory S01E01	seriesflix.is/capit ulo/the-big- bang-theory- temporada-1- capitulo-1/	Once Upon a Time S01E01	seriesflix.is/capit ulo/erase-una- vez-temporada- 1-capitulo-1/
2	9	filmisub. com	Shaft	filmisub.com/fil mi/58265-shaft- shaft-2019.html	Frozen II	filmisub.com/fil mi/58286- frozen-2- zamrznaloto- kralstvo-2- 2019.html
3	10	filmi7.c om	Shaft	filmi7.com/filmi/ 58265-shaft- shaft-2019.html	Frozen II	filmi7.com/filmi/ 58286-frozen-2- zamrznaloto- kralstvo-2- 2019.html
4	11	fmoviesf ree.to	Encanto	fmoviesfree.to/fi lm/encanto- 2021/	Tenet	fmoviesfree.to/fi lm/tenet-2020/
5	12	topflix.f m	Godzilla vs Kon g	topflix.fm/player /share_vi/?code= 4594265141&m uuid=1533&url= /movies/p4/8940 1236godzilla-vs- kingkong- 2021.mp4&medi aType=filme&m ediaName=Godz illa%20vs%20K ong&idfy=1&ln c=n&vid=02476 69761&out=null &webv=nao&cd n=	Encanto	topflix.fm/player /share_vi/?code= 3482166521&m uuid=1592&url= /movies/p4/4698 2236encanto.mp 4&mediaType=f ilme&mediaNam e=Encanto&idfy =1&lnc=n&vid= 9467669761&ou t=null&webv=na o&cdn=
6	13	filmeshd torrent.c om	Godzilla vs Kong	filmeshdtorrent.c om/godzilla-vs- kong-2021/	Encanto	filmeshdtorrent.c om/encanto- 2021/
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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.

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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 April 10, 2023.



Jan van Voorn

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