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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 CLOUDFLARE, INC.

Case Number: 2:23-mc-00006

**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., Netflix Studios, LLC, Inc., Netflix Worldwide  
25 Entertainment, LLC, Paramount Pictures Corp., Sony Pictures Television, Inc.,  
26 Universal City Studios Productions LLLP, Warner Bros. Entertainment Inc.; Village  
27 Roadshow Films North America Inc., and Warner Bros. Entertainment, Inc. (“ACE  
28 Members”), each of which is a member of the Alliance for Creativity and

1 Entertainment (“ACE”). ACE is a global coalition of leading content creators and  
 2 on-demand entertainment services committed to supporting the legal marketplace  
 3 for video content and addressing the challenge of online piracy. The ACE  
 4 Members, whether themselves or through subsidiaries and affiliates, own the  
 5 copyrights in the below referenced copyrighted works.

6 2. The ACE Members (via the Motion Picture Association, Inc.) are  
 7 requesting issuance of the attached proposed subpoena that would order Cloudflare,  
 8 Inc. to disclose the identities, including names, physical addresses, IP addresses,  
 9 telephone numbers, e-mail addresses, payment information, account updates and  
 10 account histories of the users operating the websites:

No	Domain	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	vizer.liv e	The Matrix Resurrections	vizer.live/assistir-matrix-resurrections-legendado-f12-hd-online-317/	Encanto	vizer.live/assistir-encanto-dublado-f15-hd-online-175/
2	mcfilmes.online	The Matrix Resurrections	mcfilmes.online/assistir-matrix-resurrections-legendado-f15-hd-online-315/	Encanto	mcfilmes.online/assistir-encanto-dublado-f18-hd-online-175/
3	starflix.liv e	The Matrix Resurrections	starflix.live/filmes/assistir-matrix-resurrections-online/	Minions: The Rise of Gru	starflix.live/filmes/assistir-filme-minions-2-a-origem-de-gru-online/
4	gohitv.com	Lucifer S01E01	gohitv.com/series/lucifer-s01?frm=gallery	Breaking Bad S01E01	gohitv.com/series/breaking-bad-s01?frm=gallery
5	vacatorrent.com	The Matrix Resurrections	vacatorrent.com/matrix-resurrections-torrent	Minions: The Rise of Gru	vacatorrent.com/minions-2-a-origem-de-gru-torrent

1	6	watchseries.wiki	Encanto	watchseries.wiki/encanto-2021/	Top Gun: Maverick	watchseries.wiki/top-gun-maverick-2022/
2						
3	7	kool.to	Mortal Kombat	kool.to/?d=eJxdTs sKwjAQ_BXZc0k UqmBuehBFfID0 JCIpje3apgl1tRTp v7vxcfe0szOzs_u EBhTY4p4qKdu2 FaVzlsAnIQID6n iEgsjf_syAcDpFg Lz8C6DVuRFks1 S4JpckvXQN5ljrS tal7nazZJ7cY7t5d NvLFJeHBPfXxU hcfc7HPDetyFim GagnYOcm1HkT PnQPNOyVpuMp HDljpulJMJ6M Wcbs9g5_dE58nT 6CWttQsHEN6W qwdjbVBH3fvwA CoVBe	Frozen II	kool.to/?d=eJxdTl0 LgkAQ_Cuxz3IXqBT 3FkWgkK8RIXHloa eed9iWIPjf2-vjpaeZnZmd3RF6E GCq21lwPgwDa6xt GVoOASgQxyNUiO 76Z3qEPA9A0_lvol 0sFUNtnJntS47ccd vrUney5SbJUinDal dNtz608arGLH3u6-Vlw2pX0jFHTQkqQ 7QAMYL2nBAftvkP 7V0r8hr1oMkfOelC hOE8ihck6-L6Dn90SnydKYBOG l-w7e1TdbMkgWma Xpq9Tk8
4						
5						
6						
7						
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17	8	torrentsfilmes4k.in	The Matrix Resurrections	torrentsfilmes4k.in/matrix-resurrections-torrent-2022-dezembro-06/	Minions: The Rise of Gru	torrentsfilmes4k.in/minions-2-a-origem-de-gru-torrent-2022-download-agosto-25/
18						
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22	9	gordotorrent.com	The Matrix Resurrections	gordotorrent.com/ficcao-matrix-4-download/	Minions: The Rise of Gru	gordotorrent.com/minions-2-a-origem-de-gru-torrent-2022-new-4k-download/
23						
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26	10	torrentdosfilmes.to	The Matrix Resurrections	torrentdosfilmes.to/matrix-resurrections-torrent-hdcam-720p-legendado/	Minions: The Rise of Gru	torrentdosfilmes.to/minions-2-a-origem-de-gru-2022-download-via-torrent-29-06-2022/
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1	11	torrentsdublad os.com	The Matrix Resurrectio ns	torrentsdublad os.com/filme/matrix- resurrections- torrent/	Minions: The Rise of Gru	torrentsdublad os.com/filme/minions- 2-a-origem-de-gru- torrent/
2	12	gogohd. pro	Miyazaki's Spirited Away	gogohd.pro/videos /spirited-away- episode-1	Yasuke S01E06	gogohd.pro/videos /yasuke-episode-6
3	13	seufilme .net	The Batman	seufilme.net/assist ir/filmes/batman- 2022/	Encanto	seufilme.net/assist ir/filmes/encanto/
4	14	baixarfil mestorre nts.org	The Matrix Resurrectio ns	baixarfilmestorre nts.org/matrix- resurrections- torrent-2022- dublado-oficial- legendado-web-dl- 720p-1080p- 2160p-4k- download-666/	Minions: The Rise of Gru	baixarfilmestorre nts.org/minions-2-a- origem-de-gru- torrent-2022- dublado- legendado-hdcam- 720p-download- 111/
5	15	kibado.c om	The Batman	kibado.com/watch /the-batman-2022- assistir-online/	Encanto	kibado.com/watch /encanto-2021- assistir-online/
6	16	baixarse riesmp4. xyz	The Matrix Resurrectio ns	baixarseriesmp4.x yz/baixar-matrix- resurrections- 2021-mp4- legendado-sgmj/	Minions: The Rise of Gru	baixarseriesmp4.xy z/baixar-minions- 2-a-origem-de-gru- 2022-mp4- legendado/
7	17	playmp4 .net	The Matrix Resurrectio ns	playmp4.net/assist ir/624860-matrix- resurrections	Encanto	playmp4.net/assist ir/568124-encanto
8	18	theflixer .tv	Top Gun: Maverick	theflixer.tv/watch- movie/watch-top- gun-maverick- full-5448.8336722	Encanto	theflixer.tv/watch- movie/watch- encanto-full- 74182.5572198
9	19	series9.l a	Top Gun: Maverick	series9.la/film/top- gun- maverick/watchin g.html?ep=0	Encanto	series9.la/film/enc anto/watching.htm l?ep=0

1	20	membed1.com	Top Gun: Maverick	membed1.com/videos/top-gun-maverick	Encanto	membed1.com/videos/encanto-cam
2						
3	21	superembed.stream	Top Gun: Maverick	streamembed.net/play/YmxwTUILYNBKQTFjdXlIdm9EQUkwQzd1ajBSYklrYTNtWUZlQk93YXlxVXhlZWUzTmJoQkY0WU9HaW51eWhrPQ==	Encanto	streamembed.net/play/YUZoQklLYnBKQTFIN3IYL3AyWUZnUzd2aVVOVUJIVzJTWUZlQk93YXlxVXhlZWUzTmJoQkZvME9HaXZzelI4PQ==
4						
5	22	animixreplay.to	Miyazaki's Spirited Away	animixreplay.to/video/player.php?c=4&id=www1.gogoanime.bid//category/spirited-away&s=1	Yasuke S01E02	animixreplay.to/video/player.php?c=4&id=www1.gogoanime.bid//category/yasuke-dub&s=2
6						
7	23	zoro.to	Miyazaki's Spirited Away	zoro.to/watch/spirited-away-20?ep=58021	Kengan Ashura: Part II	zoro.to/watch/kengan-ashura-2nd-season-932?ep=51904
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19 3. The purpose for which this subpoena is sought is to obtain the identities

20 of the individuals assigned to these websites who have exploited ACE Members'

21 exclusive rights in their copyrighted motion pictures without their authorization.

22 This information will only be used for the purposes of protecting the rights granted

23 to ACE Members, the motion picture copyright owners, under Title II of the Digital

24 Millennium Copyright Act.

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26 I declare under penalty of perjury under the laws of the United States of

27 America that the foregoing is true and correct to the best of my knowledge,

28 information or belief.

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Executed at Redondo Beach, California, on January 23, 2023.



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Jan van Voorn