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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-00053

**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., Universal City Studios Productions LLLP, and
25 Warner Bros. Entertainment, Inc. (“ACE Members”), each of which is a member of
26 the Alliance for Creativity and Entertainment (“ACE”). ACE is a global coalition of
27 leading content creators and on-demand entertainment services committed to
28 supporting the legal marketplace for video content and addressing the challenge of

1 online piracy. The ACE Members, whether themselves or through subsidiaries and
 2 affiliates, own 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	App Name	Download Site	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
1	Movie HD APK - 5.1.3	moviehdapkdownload.com/download/movie-hd/?tmstv=1677439955&version=5-1-3	Happy Death Day 2U	rr3---sn-a5msenl7.c.drive.google.com/videoplayback?expire=1677714169&ei=uar_Y8jINIKmir4Pm4OisAo&ip=76.79.182.178&cp=QVRMWUhfU1FUSlhPOm5zbFotSmM1OXJvdER1Tmd4NWx6Q0VvRnpCUVISRDJSZFgzCHBjc1NPdk4&id=792d82f287f11a92&itag=22&source=webdrive&requiressl=yes&mh=Jz&mm=32&mn=sn-a5msenl7&ms=su&mv=m&	Elvis	rr3---sn-a5msenl7.c.drive.google.com/videoplayback?expire=1677714169&ei=uar_Y8jINIKmir4Pm4OisAo&ip=76.79.182.178&cp=QVRMWUhfU1FUSlhPOm5zbFotSmM1OXJvdER1Tmd4NWx6Q0VvRnpCUVISRDJSZFgzCHBjc1NPdk4&id=792d82f287f11a92&itag=22&source=webdrive&

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No	App Name	Download Site	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				mvi=3&pl=18 &ttml=transient &susc=dr&dri veid=1AdAwO b9Frnt5NmFLi VaPNKBnLPI5 TuJ- &app=explore r&mime=vide o/mp4&vprv= 1&prv=1&dur =5996.088&l mt=15569549 44836136&mt =1677699416 &subapp=NO NE&sparams= expire%2Cei% 2Cip%2Ccp%2 Cid%2Citag%2 Csource%2Cre quiressl%2Cttl %2Csusc%2Cd riveid%2Capp %2Cmime%2C vprv%2Cprv% 2Cdur%2Clmt &sig=AOq0QJ 8wRQlgUyYj2j fwYL-MG- t4mrvoE7_Kcb hllU4jAM93P0 4DCykCIQCRsl SUMcuxDyfO9 FAmqd2Bn5A gloie-		requiressl= yes&mh=Jz &mm=32& mn=sn- a5msenl7& ms=su&mv =m&mvi=3 &pl=18&ttml =transient &susc=dr& driveid=1A dAwOb9Fr nt5NmFLiV aPNKBnLPI 5TuJ- &app=expl orer&mim e=video/m p4&vprv=1 &prv=1&d ur=5996.08 8&lmt=155 695494483 6136&mt= 167769941 6&subapp= NONE&spa rams=expir e%2Cei%2 Cip%2Ccp %2Cid%2Ci tag%2Csou rce%2Creq uiressl%2C ttl%2Csusc %2Cdriveid

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No	App Name	Download Site	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				JR_bXxquvmz ng==&lsparam s=mh%2Cmm %2Cmn%2Cm s%2Cmv%2Cm vi%2Cpl&lsig= AG3C_xAwRgl hAOfFUff6_zh kfleXHWvlwM cPdPG0oEInLO C92MMZX5sY AiEaiP7emZPZ M2qus- zja2Ui1u_uFO wR3QPp3axt MYBHLFQ=		%2Capp%2C mime%2C vprv%2Cpr v%2Cdur% 2Clmt&sig= AOq0QJ8w RQlgUyYj2j fwYL-MG- t4mrvoE7_ KcbhllU4jA M93P04DC ykCIQCRsIS UMcuxDyf O9FAMqd2 Bn5Agloie- JR_bXxquv mznng==&ls params=m h%2Cmm% 2Cmn%2C ms%2Cmv %2Cmvi%2 Cpl&lsig=A G3C_xAwR glhAOfFUff 6_zhkfleXH WvlwMcPd PG0oEInLO C92MMZX 5sYAiEaiP7 emZPZM2q us- zja2Ui1u_u FOwR3QPp 3axtMYBHL FQ=


No	App Name	Download Site	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
2	TeaTV v10.5.7	download.teatvapkdownload.com/apk/teatv_10_5_7_teatvapkdownload.apk	Strange World	s95.upstreamcdn.co/hls2/01/04260/up6xx215x7xu_o/master.m3u8?t=qoFAw7ZD_5slAE0EPmOP8pFqKvw7ZS7382B1kycFk4o&s=1679508113&e=10800&f=21307117&i=0.0&sp=0	Mortal Kombat	s95.upstreamcdn.co/hls2/01/02404/62wj3fsoxgan_n/master.m3u8?t=hwbKWebJb3sZtl1pzuCSwc0ETeBhmLb1a_fzYw0ouw&s=1679507909&e=10800&f=14249421&srv=s23&i=76.79&sp=0&p1=s23&p2=s23

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 motion pictures without their authorization. This information will only be used for the purposes of protecting the rights granted to ACE Members, the motion picture copyright owners, under Title II of the Digital Millennium Copyright Act.

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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 April 10, 2023.



Jan van Voorn