

1 TIANA S. BAHERI (State Bar No. 330835)  
Tia.Baheri@mto.com  
2 MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue  
3 Fiftieth Floor  
Los Angeles, California 90071-3426  
4 Telephone: (213) 683-9100  
Facsimile: (213) 687-3702

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-00056

**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 Universal City Studios Productions LLLP 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	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
1	photocal l.tv	Birds of Prey and the Fantabulo us Emancipat ion of One Harley Quinn	live5- ott.izzigo.tv/out/u /dash/HBO2- HD/dash/HBO2H D- video=1620000- 1007769608452.d ash?bpkout=defa ult	Fast & Furious 9	live5- ott.izzigo.tv/out/ u/dash/HBO- HD/dash/HBOH D- video=858800- 1007770593888. dash?bpkout=def ault
2	multican ais.vc	Minions	origin.esporteone. com/MEGAPIXS D/tracks- v1a1/mono.m3u8 ?md5=Hluwvd70 wWfG_M3H6P0 sew&expires=16 79628263	The Big Bang Theory S07E09	origin.esporteone .com/WARNE RHD/tracks- v1a1/mono.m3u 8?md5=PwEdkv A- Xj9CDoH2jlaQk Q&expires=167 9626873
3	megacan ais.com	Minions	player.aovivotv.x yz/channels/mega pix/external	The Big Bang Theory S07E09	player.aovivotv. xyz/channels/wa rnerchannel/exte rnal

25 3. The purpose for which this subpoena is sought is to obtain the identities  
 26 of the individuals assigned to these websites who have exploited ACE Members’  
 27 exclusive rights in their copyrighted motion pictures without their authorization.

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

1 to ACE Members, the motion picture copyright owners, under Title II of the Digital  
2 Millennium Copyright Act.

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4 I declare under penalty of perjury under the laws of the United States of  
5 America that the foregoing is true and correct to the best of my knowledge,  
6 information or belief.

7 Executed at Redondo Beach, California, on April 10, 2023.

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Jan van Voorn