

1 TIANA S. BAHERI (State Bar No. 330835)
Tia.Baheri@mta.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 TONIC DOMAINS CORPORATION

Case Number: 2:23-mc-00007

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

1 on-demand entertainment services committed to supporting the legal marketplace
 2 for video content and addressing the challenge of online piracy. The ACE
 3 Members, whether themselves or through subsidiaries and affiliates, own the
 4 copyrights in the below referenced copyrighted works.

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

No	Domain	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	kool.to	Mortal Kombat	kool.to/?d=eJxdTssKwjAQ BXZc0kUqm BuehBFfID0JCIpje3 apgl1tRTpv7vxcfE0 szOzs uEBhTY4p4q Kdu2FaVzlSAnIQI D6niEgsjf syAcDpFgLz8C6DVuRFkslS4JpckvXQN5ljrStal7 nazZJ7cY7t5dNvLF JeHBPfXxUhcfc7H PDetyFimGagnYOC M1HkTPnQPNOyV puMpHDljpuLJMj6 MWcbs9g5 dE58nT6CWttQsHEN6Wqw djbVBH3fvwACoV Be	Frozen II	kool.to/?d=eJxdTI0LgkAQ_Cuxz3IXqBT3FkWgkK8RiXHloaed9iWlPjf2-vjpaeZnZmd3RF6EGCq21lwPgwDa6xtGVoOASgQxyNUiO76Z3qEPA9A0 IvoI0sFUNTnJnt547ccdvrUney5SbJUinDal dNtz608arGLH3u6-Vlw2pX0jFHTQkqQ7QAMYL2nB AfTvkP7V0r8hr1oMkfOelChOE8ihck6-L6Dn90SnydKYBOGI-w7e1TdbMkgWmaXpq9Tk8
2	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/
3	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

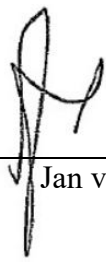
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4	zoro.to	Miyazaki's Spirited Away	zoro.to/watch/spirited-away-20?ep=58021	Kengan Ashura: Part II	zoro.to/watch/kengan-ashura-2nd-season-932?ep=51904
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3. The purpose for which this subpoena is sought 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.

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 January 23, 2023.



Jan van Voorn