

1 OLIVER L. BROWN (State Bar No. 335952)
2 oliver.brown@mto.com
3 MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue
3 Fiftieth Floor
4 Los Angeles, California 90071-3426
4 Telephone: (213) 683-9100
5 Facsimile: (213) 687-3702

5 Attorneys for Motion Picture Association, Inc.

6

7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10

11

IN RE: DMCA SECTION 512(h)
12 SUBPOENA TO DISCORD, INC.

Misc. No.: 3:26-mc-80039

13

14

**REQUEST TO THE CLERK FOR
ISSUANCE OF SUBPOENA
PURSUANT TO 17 U.S.C. § 512(h)**

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 Petitioner Motion Picture Association, Inc., through undersigned counsel and
2 its authorized representatives, hereby requests that the Clerk of this Court, pursuant
3 to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h), issue the
4 attached proposed subpoena to Discord, Inc. to identify alleged infringers of
5 copyrighted works.

6 Petitioner has satisfied the requirements for issuance of a subpoena pursuant
7 to 17 U.S.C. § 512(h), namely:

- 8 (1) Petitioner has concurrently filed a proposed DMCA subpoena;
- 9 (2) Petitioner has attached hereto the sworn Declaration of Larissa Knapp
10 confirming that the purpose for which the proposed subpoena is sought
11 is to obtain the identity of the alleged infringer(s), and that such
12 information will only be used for the purpose of protecting the
13 copyright owners’ rights under U.S. Code Title 17; and
- 14 (3) Petitioner has attached as Exhibit 1 to the Declaration of Larissa
15 Knapp a copy of the notification required by 17 U.S.C. §512(c)(3)(A).

16 Having complied with all statutory requirements, Petitioner respectfully
17 requests that the Clerk expeditiously issue and sign the proposed subpoena pursuant
18 to 17 U.S.C. § 512(h)(4) and return it to undersigned counsel for service on the
19 subpoena recipient.

20
21 DATED: February 13, 2025

MUNGER, TOLLES & OLSON LLP

22
23 By: /s/ Oliver L. Brown
24 OLIVER L. BROWN

25 Attorney for Motion Picture Association,
26 Inc.