



Mr. Jan van Voorn
Executive Vice President & Chief of Global
Content Protection,
Motion Picture Association, Inc.,
On Behalf of the Alliance for Creativity and
Entertainment

15301 Ventura Blvd., Building E
Sherman Oaks, CA 91403
Phone: (818) 995-6600
Email:
Jan_vanVoorn@motionpictures.org

September 7, 2023

VIA EMAIL
legal@cloudflare.com; abuse+law@cloudflare.com
Justin Paine, Cloudflare, Inc.
101 Townsend Street Legal Department
San Francisco, CA 94107

Re: Notice of Infringement Regarding Certain Cloudflare Use

Dear Mr. Paine:

I am writing on behalf of the Alliance for Creativity and Entertainment ("ACE").

ACE is a global coalition of leading content creators and on-demand entertainment services committed to supporting the legal marketplace for video content and addressing the challenge of online piracy. ACE includes some of the world's largest and most respected motion picture and television rights owners including, among many others, Paramount Pictures Corporation, Sony Pictures Entertainment Inc., Universal City Studios LLC, Walt Disney Studios Motion Pictures, Warner Bros. Entertainment Inc., Amazon Content Services LLC and Netflix Studios, LLC (together, the "ACE Members").

ACE is organized for the purpose of preventing and mitigating online theft of copyrighted films and television programs, and undertakes initiatives to identify and take action against piracy threats to create an online environment in which copyrighted film and television content is more secure and online content theft can be addressed more effectively and efficiently.

The ACE Members, whether themselves or through subsidiaries and affiliates, own or are the exclusive licensees of copyrights in a vast library of motion pictures and television programs (the "Copyrighted Works").





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We have determined that users of your system or network have infringed certain ACE Members' Copyrighted Works via the below-referenced Websites:

No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
1	webtvgu ek.org	5gdgde3.fun: 8080	Frozen	37.59.89.188:8080/movie/[REDACTED] /[REDACTED] /93458.mp4?&hmac=aa37d4a931123ee92140a6e2bb5b5b77&token=HhBcVkoLFwMbWgdWD1IMWgYBVftVBARUDAAEBwIRUgBWBVFTAFcHW1hAHxZKQ0ddA1RqC1QWCA8KAQFbFRDFQBAa15dQQ8bDVADAAEDFxRATVwPVRYIBw8NDFUMCg9QXB4WR1AHFwMbUwsMDg4DDkAVFwdIQFdEV1RYPF1WQA8GVxYNGO EZG1YMbFBcWIRWBhsPQAAWHhRQRkRBAXF/NjMGFHVQD1xKUA8TeE1TGxgTVxMEhgQVFBBRgJNVhRcRwEFBAXBGRtaDUZaTUVVMGhXQA5cGBBTQUFRDUPaWQhHCBZ	Dungeons & Dragons: Honor Among Thieves	94.23.147.111:8080/movie/[REDACTED] /[REDACTED] /92708.mp4?&hmac=aa37d4a931123ee92140a6e2bb5b5b77&token=HhBcVkoLFwMbVARVCQADW IYOvtUAAcCCgUGAFOLBwBQVIFRAVcMDFxAHxZKQ0ddA1RqC1QWCA8LAGRbFRFDFQBAa15dQQ8bDVADAAEDFxRATVwPVRYIBw8NDFUPAQ5eUB4WR1AHFwMbUwUCDwEGCUAVFwdIQFdEV1RYPF1WQA8GVxYNGO EZG1YMbFBcWIRWBhsPQAAWHhRQRkRBAXF/NjMGFHVQD1xKUA8TeE1TGxgTVxMEhgQVFBBRgJNVhRcRwADBQBBGRtaDUZaTUVVMGhXQA5cGBBTQUFRDUPaWQhHCBZaSV





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No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				aSVcXFRsLQGtLU kZMEFxUD1VGE AwbBRZPG15XHj pRW1IXBIZNUA1 dRxsNFwIAFRcPX 1pbQlZHaxNQVx RcC0dYW0Q=		cXFRsLQGtLUKZ MEFxUD1VGEaw bBRZPG15XHjpR W1IXBIZNUA1dR xsNFwIAFRcPX1p bQlZHaxNQVxRc C0dYW0Q=
2	guck.org	5gdgde3.fun: 8080	Frozen	37.59.89.188:8080/movie/[REDACTED] /[REDACTED] /93458.mp4?&hmac=aa37d4a931123ee92140a6e2bb5b5b77&token=HhBcVkoLFwMbWgdWD1IMWgYBVftVBARUDAAEBwIRUgBWBVFTAFcHW1hAHxZKQ0ddA1RqC1QWCA8KAQFbFRDFQBAa15dQQ8bDVADAAEDFxRATVwPVRyIBw8NDFUMCg9QXB4WR1AHFwMbUwsMDg4DDkAVFwdIQFdEV1RYPF1WQA8GVxYNGO EZG1YMbFbcWIRWBhsPQAAWHhRQRkRBAXF/NjMGFHVQD1xKUA8TeE1TGxgTVxMEhgQVFBBRgJNV	Dungeons & Dragons: Honor Among Thieves	94.23.147.111:8080/movie/[REDACTED] /[REDACTED] /92708.mp4?&hmac=aa37d4a931123ee92140a6e2bb5b5b77&token=HhBcVkoLFwMbVARVCQADWlYOVIUAACCGUGAFOLBwBQVIFRAVcMDFxAHxZKQ0ddA1RqC1QWCA8LAGRbFRFDFQBAa15dQQ8bDVADAAEDFxRATVwPVRyIBw8NDFUPAQ5eUB4WR1AHFwMbUwUCDwEGCUAVFwdIQFdEV1RYPF1WQA8GVxYNGOEZG1YMbFbcWIRWBhsPQAAWHhRQRkRBAXF/NjMGFHVQD1xKUA8TeE1TGxgTVxMEhgQVFBBRgJNVhRcRw





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No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				hRcRwEFBAxBGR taDUZaTUVMGlh XQA5cGBBTQUF RDUpaWQhHCBZ aSVcXFRsLQGtLU kZMEFxUD1VGE AwbBRZPG15XHj pRW1IXBIZNUA1 dRxsNFwIAFRcPX 1pbQlZHaxNQVx RcC0dYW0Q=		ADBQBBGRtaDU ZaTUVMGlhXQA 5cGBBTQUFRDU paWQhHCBZaSV cXFRsLQGtLUkZ MEFxUD1VGEaw bBRZPG15XHjpR W1IXBIZNUA1dR xsNFwIAFRcPX1p bQlZHaxNQVxRc C0dYW0Q=
3	privateip tvaccess. com	pia.cx	Mortal Kombat	154.16.153.178:8 0/vauth/fH1MZq Mv8sMs_x3UuA CEKsUh8EjHFHO EKgbqDRSKsRa0 UFxw8EH6RIZiLhj TuMZh2vI8vuK9 DqaPE89- 4nJ6bzqjbcweRn MIjSNSkhv1zB9U p3UWIPmEjhVifv ysgL- Lrl4RM7ryysDL9 ov5LaJDkesmrna OHSPuTV1c8y8rF nPWRKzKcB861O Cslx- G1P7BlvzMqbtjih mk6D7b_fadxxqS rsBek1XqjjDx6cK TeEuHjEuH7IDBd oGVxwXpj0dXNU 66GxG_li6Jl1- Kilyhc_cJFSTzSve 7Bsi-	A Quiet Place II	154.16.153.1:80/ vauth/fH1MZqM v8sMs_x3UuACE KvrEdsjLLzGwkpd 7spNZfEqMQouLL siPYFnRH40igQ7 q1TjwMPNBxnaC Nw6ZZx9F7k09gl 4mttBqEjJ8bHmt rQ65206SukqJM 9mQsKBro8sjAN PG7fV7UixTPukw RhB59449uHbch Y6lnNmNavmpU XugJSjmLHN05jT D5itPJ1iQKHmT8 usNshswjl- Eo8tEOwbbRZES CnLxKzoQF6vnlZ KwsEWWvmZH7 X4fDOAqI3_vKod oWeEOMWzUgc pczh52Clxp32pvY QMPgOL4gHT8ce tPeLHgMgj1Pkr0





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No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				_h1FLUBbvAzP1J UPB31ktdnTWn wvL4t4T7lyEwxK SA4fFJtNlfoKI6hb 1GD9xPcgHira9I7 sIGMKVyfl4U0tq bHv3cpZ6WNV2 MDJNFy5BtcFEgJ JmsoXmJoE__Xs6 5YeYdAyA- jHHmlze96WTdB PqBzommBlmafy pCJ4QvdukzuQH ZBbG6HFk0out- xced8GGwTddtkc vEuw6rRDq22I5T NFUqMHTXDi3w mi7aStPTYGpnr6 - N_viDiOsFegGiKp KOsmFX2Fz- uGUQXJNDUGYe 4UHFCyJwFOPR3 vV8xOUedwVbQ UKfLiilICTGMH_B WqM- JY53hW7haHu63 R22E4ginxVF0uk n4QmNpy93_qD PhJfMyCFQDa9L o9XKHuAI8leltbw WcgKNj- 6QeNsloNaeJM9 ai1i26AXpP_0Dnt MTGDONJq0Si3j		QtwvMzW2SjUS B4lZbZ5jnzctsyh Q6nNw3PhVnkC giQTjv8vP7H1inO E- uvqkTVsGXNaw1 HwpdiaPMleBm HPfoQqWbFSttV dGsluxumfGBvjk esY_k10d87qHbs Fs30MU2m2eBn d85nTHQc- 3MfifLj2TAOHDt Hr_J4Hd6ylbv- hc9g0a193YyYM vF3H- 4Exu9T4UdS8S8o oK4NM8s- niCECJRA5047kk nI2ZrIOhFe77K5o k7BSL1QvXyh3V_ QlwYzMii_v95tsK yGU9f8q76EKhc 3KIQ- SAI4d7HJJJeSFML F- k_IS6Q6DjJyRa7p qEKfNMGPCNYU- 0j1FvCHemeQw0 NDfNKAG6cpcOF Ff2R0KopQ8hdP GL731OzOrFsNcE GuYCR7Om1NYk Y8dGNmvrHRIfyC SuUvxx9wHGNN UqdqVfxwwrfMI





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No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				Gb6TuEBUSRUk8A6L0wfU		
4	iptvespana.online	cgrqknp.smart-tv.xyz:80	Top Gun: Maverick	vod07w4y.konda.biz:2052/movie/[REDACTED]/[REDACTED]/400443779.mkv?token=NmdKS0hkZ0xqNm1xcktm	Aquaman	vod03w3y.konda.biz:2052/movie/[REDACTED]/[REDACTED]/400246045.mkv?token=czFzZ3pFZ0YxUnlrZ0tJ
5	line.ottcs.t.org	line.ottcst.org:80	Frozen 2	dp3.ottlb.org:80/movie/[REDACTED]/[REDACTED]/15119.mkv?token=YWVBU2IVS WVraIJDYWhv	Dungeons & Dragons: Honor Among Thieves	hs3.ottcr.net:80/movie/[REDACTED]/[REDACTED]/514312.mkv?token=bHVRT1QxTVFUbdRtZHp5
6	line.rs4ott.com	line.rs4ott.com	Frozen 2	103.176.90.157:8080/live/play/T0VScVN6VXpjbE13VG1kNVVqVIdaVWx6TjBKTIRqVXdSUzgyVGpKRVptd3dNM2RHYzFKSmIwMHZUVD9/404573	Dungeons & Dragons: Honor Among Thieves	185.243.7.242:8080/live/play/UTF0aINHTTRXbfZzZUdoNmNtRk5SaTl4Y2xGNWVXRZkSFZIWmpWdU0yZGhZak54V2tkak5YbEvvVDA9/889655
7	rapidiptv.pro	tv.rapidiptv.tvip.xyz:80	Frozen	85.203.33.57:80/live/play/WVRGNFFWtKhOVzQxVlhkcU0ycGIWblJTYUhKdWRXNTRhM1JXZUhsWVJtcHIXSGhNT1hoM2NFRIdWVDA9	The Amazing Spider-Man	85.203.33.57:80/live/play/UORReIvTbEVOU3R0VWxSME9ESKIRMHhUYld4M2FUaGhZWE5qVIVKWVplQk1OM2hOZUdkdGVYcG5WVDA9





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No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
8	mujitv.com	mujitv.com	13 Hours: The Secret Soldiers of Benghazi	cdn.th136.jpnett v.live:544/jptv_v od/13.Hours.mp4/media_w1705352578_3.ts?63.32.122.155&doannuadiconchoendtime=1692721057&doannuadiconchohash=G4IOPYSE56rD3TyyTkWhJpmVv5f9UYMdsY64VUNpCzQwgK6Bep1l_Qcxfu7qPpO&doannuadiconchostar ttime=1692713857	Mulan (Live Action)	cdnv148.cloudrrs t.com/nip_vod/Mulan.mp4/media_w587044981_4.ts?63.32.122.155&doannuadiconchoendtime=1692721819&doannuadiconchohash=3lwiqQuQLgZl kHVLT2ylc6wAXJ6771IRSvx_MR2zACv7MhfVcXgOnHBKz7d0b8sQ&d oannuadiconcho starttime=1692714619
9	sportium tv.com	mateus.sport iumvip.xyz:8080	Top Gun: Maverick	163.172.75.164:80/vauth/XAbGKi5MNUBCS3Osr-Ts9IblTFVQaHlquJDnZ8a3Fj1bbhnAk2NYmFfe5KKhzAoiMKPbRvwf7cQuD-CY_T_OKuh2DzZ8rgLCjIJe1IK71AZq5fz2wc1prutXJxfx8iT33WLdZN3NYoQ8dbopfAjs0SnEzVRtBgGjbrDtm dqz9DWaPk6AwnidoGRJYfjLwKKnH8yFVWjoXclwjwxOokgMH2ca	Aquaman	163.172.75.164:80/vauth/xeiDxbX MVKjOa_sz0bOeuOm_6ff15RtCAYqvWvfsD3078-4T9R7wilSa_ALkryFblJ9cbyVhAX5kE7W-jtwEnn2rEzaF1f7Epk1VtOfdBFwPTIEBVivqvMSjd00uwZT4oo_VVqI9H2Qu4AhQHjztf6pEcPqTH2DOBtLF_JG13VpSJCnvDnsFvj7JdC3HT8GnhjsbQLs6wBOm4-





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No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				PE4rvWmvj2KYG EhZ- AUK7OmAgqmp- odB7GWypFZ9D aFXyUQuhao3AI M20o6pghF9hdo ALcbiL- PSlpO5_vR4ISv- 2a6pMuxOn2jfEB - foG6Qth4HiN1VS BGYobzI7yqVeLB pqm- _ll6myciKRItvwiB ba9ukH0xYwPjf1 Bg2ngkS3KedWR aukT_y6091UVI 78A0kn3bNwb0f Zc6QBbMr5CKUC v4HpkP2RMqchB ss9Yhyrmo66KH Dt7zd0QSMORCZ UeKveSyP2ftuHL pcSrO6VXSQ0iQ VEs25JAHun3nyx BSQXxdUHOdbd XWd3L3dfhXxqU o4veKk2jHXqg31 mbx_wGbfVdsj BiMg3J5l1MWW sQ7pgcEZvTTcnp yiKJF1PPMIaJUIE ZAvQSLV_RX5b6 pR6_D6- RpiLON0yaOah6 EogJlaugJUHTZp7		VZoHehQDnxSfm xzqXeAZZcefpDF S8ioaY2ZIKptIjyR LiwQttcj9RG6Lgq P0uXhC0JctVloyE nA9VCy- gGYc_aTu7KALG Wg6hc2qFwNjW JyO9FHIORD4EyK vdw6xPan- m1is5F4Hz0HPB QCjnz43KdSW3 gHBM1Dt5ffnK8x QHii9gi1wpCOJ5 934EdRtTdzIL7KP R0RaDOjI2AvAcB 3k7kPZJa- S1eKrgM2aU9zS d3Oc8OpXQNHx Gr- Z1V4S0wiBoKllux 5qrptMYPcn1c1a qYWaD1u2depd pZVwxxQOwhGC EiNvrkjI1fRaOy- h9ih5ue_oUqvNk cwTVgssSaAG5A Tzs5oPoKloclq9 0K6BVkcc5W- t1liq8cZIJLBz5Zi 8gNMVnzsZ9- yIjQZkogpCnc6cL R3vEneIMbE- VmVrwwyaMbA7 MkhCoojUAbfK muAH5_WBVZvZ





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No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				WSN08XJloXKZa RsnvO73hGyYo0		uOoRzNL-qqe- XBk
10	sixstartv.com	star.iptvpane l.xyz:80	The Little Mermaid	65.21.224.145:80 /vauth/rJy7TKfg5 8MyfcNzSqdluTv ZDdDu7QH-eqi- qmq3DMtXwt4yU xwH0lgKD4U- yAcsZz7LL2hYg1o st7gY1ur39O- KJeqdMVu8CGKZ CSp_BhnVe7QY mgUmxM2RLSL2 QDU- 6iM8X_DGIMtscL UNu93D8ckoQfk QMS_Qyxop5Xku wDQxvnjUaCA2b t52r1PXqMG_- 4qr9pff66CJrpw- oKUdEdXyH0Gmf H29zA4jlgUPkhlo hBhn- rmT_WiJanU9E3 XLbHE0264AGdC OHjpia7w- 3VA1n8_LGhQLc orEjZFpw- 9WEXxYG_Xh8dj 9vbdEkpc9qBLn- 5EcZeqXcH6NSAj jYQgzazcjH5S1Ztj mgw-rb3rbAZw- GjnQ0_dGHWmE qWHpXvltPhqRM 2ih_vKAVAc0QeY	Harry Potter and the Deathly Hallows Part II	65.21.224.145:80 /vauth/x2i0KVu6 S3Bm42BTsQxyj wGxre3s8Z_V7KI - ptgCQ9h1xv5Gs_ BGNr8xQFFMPN U- A_QzHNVPNTw 6iyxUzxpW0rGyH VPUQ- bMpCkM04jn- EYXKMI5JAfFlbQ eLEegMovRFp01 _c7QyzoDg_nieF HpUHhgdEQd_kr XnKE- jEdAmgonhionm F8O7qSA0nEgl3x hvqIQ8- jKKPg5VYxP5t2fs JkUKmi12cYTfDV NotN3IF4tyxVDy DnT54U- 5eexS6bNoM3p Q2umtuH9IPdGT jkJIBCnhcVCq- HDoizyIrkS2KUW 0agRA1ivqHK4O QcMA31UIQLOZ EfAvTxW1ny_vpy A7shquv8pQYNB g83W- xiMWmsbIDpVG





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No	Domain	M3U Portal	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
				Hmq2L3ld1vzE3-4jfQfvct2C1kq1F4w-qyPsjZc_hvluPz557qgboZKaWVRo9rukOx8d_udAk33y6ZkMhmzSUKdkrR7JrY1TAUQe9xdEzXVonXWNfeOgYysz1Js2L3r8yQ9FeISFzTK1ST1dq8KBY-wRclFOkmpHdBAORnAO5B87VnwKxtlCOFXDX5lez72nMOXZOR2T5YGnDZwelF5cCGik-KNUpZOiuXnHQxu04		SNGNJVQ1xkOjuZjlQ2ndhaNry85_5cld2JV-6VlKvuCZpOluC7zbjdd5PSGsWTmjFLy1-gnNGILLbAPMJx9cPRDimUBiuY2hzOKK31fbQKEwLVKBtS5IEhqumuTBW7SKpuaWPPi8UEPbi7L7Nk-hl68tIEA6ezrIrii3hlzUlynmw89Z-AbRQsgj6-W2j_fSWrj0HT84YIA3YfXmSFTXQ0B3_6v92TZ5p-yMKhkMta82IZXfgQD8RSnqputyKqylj91pRTfEVuq1CS

Enclosed is a subpoena compliant with the Digital Millennium Copyright Act. The subpoena requires that you provide information concerning the individuals offering infringing material described in the attached notice. As is stated in the attached subpoena, you are required to disclose to the Motion Picture Association, Inc. (on behalf of the ACE Members) information sufficient to identify the infringers. This would include the individuals' names, physical addresses, IP addresses, telephone numbers, e-mail addresses, payment information, account updates and account history.





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We are providing this notice based on our good faith belief that the use of motion pictures and television programs owned by the ACE Members in the manner occurring via the websites identified below is not authorized by the copyright owners, their agents, or the law. The information in this notification is accurate and, under penalty of perjury, we are authorized to act on behalf of the ACE Members, which own or control exclusive rights under copyright that are being infringed in the manner described herein. This letter is without prejudice to the rights and remedies of the ACE Members, including to recover damages and any other claims for relief, all of which are expressly reserved.

If you have any questions, please contact me at (818) 995-6600, or via email at Jan_vanVoorn@motionpictures.org.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jan van Voorn". The signature is written over a horizontal line.

Attachment and Enclosure

