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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: 2:24-mc-00076

**DECLARATION OF DANI BACSA
IN SUPPORT OF ISSUANCE OF
SUBPOENA PURSUANT TO 17
U.S.C. § 512(h)**

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20 I, Dani Bacsa, the undersigned, declare that:

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22 1. I am Senior Vice President and Deputy Chief of Content Protection for
23 the Motion Picture Association, Inc. (“MPA”). I submit this declaration on behalf
24 of Columbia Pictures Industries, Inc., Disney Enterprises, Inc., Paramount Pictures
25 Corp., Sony Pictures Animation, Inc., Universal City Studios Productions LLLP,
26 and Warner Bros. Entertainment, Inc. (“ACE Members”), each of which is a
27 member of the Alliance for Creativity and Entertainment (“ACE”). ACE is a global
28 coalition of leading content creators and on-demand entertainment services

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

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

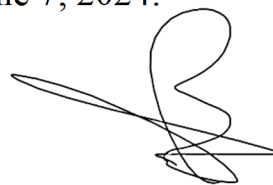
No	Domain	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	kickassanime.mx	Food Wars! S01E01	kickassanime.mx/food-wars-shokugeki-no-soma-8b8f/ep-1-57d829	Summer Time Rendering S01E01	kickassanime.mx/summer-time-rendering-2872/ep-1-2962
2	goojara.to	Mean Girls	goojara.to/mVwgxP	Barbie	goojara.to/mzE5QW
3	movieffm.net	Mission: Impossible - Dead Reckoning Part 1	movieffm.net/movies/mission-impossible-dead-reckoning-part-one	Gran Turismo	movieffm.net/movies/274269/
4	supernova.to	Mean Girls	supernova.to/mVwgxP	Barbie	supernova.to/mzE5QW
5	braflix.video	Teenage Mutant Ninja Turtles: Out of the Shadows	braflix.video/pt/movie/308531	Spider-man: Into the Spider-Verse	braflix.video/pt/movie/324857
6	animesonlinecc.to	Tokyo Revengers S02E02	animesonlinecc.to/episodio/tokyo-revengers-seiya-kessen-hen-episodio-2/	Mob Psycho 100 S01E05	animesonlinecc.to/episodio/mob-psycho-100-episodio-5/
7	hdtodaytv.icu	Encanto	hdtodaytv.icu/moviesfree/encanto	Top Gun: Maverick	hdtodaytv.icu/moviesfree/top-gun-maverick
8	anitaku.to	Food Wars! The Second	anitaku.to/shokugeki-no-	Tokyo Revengers S02E01	anitaku.to/tokyo-revengers-

		Plate S02E01	souma-ni-no- sara-episode-1		seiya-kessen- hen-episode-1
9	anitaku. so	Food Wars! The Second Plate S02E01	anitaku.so/shok ugeki-no- souma-ni-no- sara-episode-1	Tokyo Revengers S02E01	anitaku.so/toky o-revengers- seiya-kessen- hen-episode-1
10	animepa he.com	Hi Score Girl S01E01	animepahe.com /play/b412e9fd -8284-4ab8- 1ecd- b2136c96959c/ 04826ae68a8d 154f24611152c 32962d9438ca 1e5e527ae8abc bc58d1dccce23 0	Sol Levante	animepahe.co m/play/28a129 ee-b04c-fba8- 1c05- 89af4e5bab86/ 5313aba7396f0 1d66261fc32b 08eaf63794a9 b016eaf0f08bc a5f2f65702f30
11	animepa he.org	Hi Score Girl S01E01	animepahe.org/ play/b412e9fd- 8284-4ab8- 1ecd- b2136c96959c/ 04826ae68a8d 154f24611152c 32962d9438ca 1e5e527ae8abc bc58d1dccce23 0	Sol Levante	animepahe.org/ play/28a129ee- b04c-fba8- 1c05- 89af4e5bab86/ 5313aba7396f0 1d66261fc32b 08eaf63794a9 b016eaf0f08bc a5f2f65702f30
12	gogoani me.me	Tengoku- Daimakyo S01E01	gogoanime.me/ tengoku- daimakyou- episode-1	Yasuke S01E01	gogoanime.me/ yasuke- episode-1
13	soaper.t v	The Lion King	soaper.tv/movi e J2gb5b3DzP. html	Aquaman	soaper.tv/movi e o9dG79ND0 5.html
14	ssoap2d ay.to	Encanto	ssoap2day.to/m ovies/encanto	Top Gun: Maverick	ssoap2day.to/ movies/top- gun-maverick
15	soap2da y.tf	Encanto	soap2day.tf/mo vies/encanto	Top Gun: Maverick	soap2day.tf/mo vies/top-gun- maverick
16	soap2da y.qa	Encanto	soap2day.qa/m ovies/encanto	Top Gun: Maverick	soap2day.qa/m ovies/top-gun- maverick
17	vegamo vies.to	Cruella	vegamovies.to/ download- cruella-2021	Barbie	vegamovies.to/ download- barbie-2023- english-full- movie-480p- 720p-1080p

1 3. The purpose for which this subpoena is sought is to obtain the identities
2 of the individuals assigned to these websites who have exploited ACE Members’
3 exclusive rights in their copyrighted motion pictures without their authorization.
4 This information will only be used for the purposes of protecting the rights granted
5 to ACE Members, the motion picture copyright owners, under Title 17 of the United
6 States Code, the Copyright Act.

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

11 Executed at Sherman Oaks, California, on June 7, 2024.

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Dani Bacsa