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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: 2:24-mc-00077

**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 Disney Enterprises, Inc., Paramount Pictures Corp., 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 Tonic  
5 Domains Corporation to disclose the identities, including names, physical addresses,  
6 IP addresses, telephone numbers, e-mail addresses, payment information, account  
7 updates and account histories of the users operating the following websites:

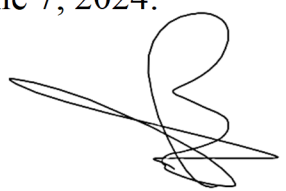
No	Infringing Website	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	vegamovies.to	Cruella	vegamovies.to/download-cruella-2021	Barbie	vegamovies.to/download-barbie-2023-english-full-movie-480p-720p-1080p
2	goojara.to	Mean Girls	goojara.to/mVwgxP	Barbie	goojara.to/mzE5QW
3	supernova.to	Mean Girls	supernova.to/mVwgxP	Barbie	supernova.to/mzE5QW
4	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/
5	anitaku.to	Food Wars! The Second Plate S02E01	anitaku.to/shokugeki-no-soumanino-sara-episode-1	Tokyo Revengers S02E01	anitaku.to/tokyo-revengers-seiya-kessen-hen-episode-1
6	ssoap2day.to	Encanto	ssoap2day.to/movies/encanto	Top Gun: Maverick	ssoap2day.to/movies/top-gun-maverick

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

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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 Sherman Oaks, California, on June 7, 2024.



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Dani Bacsa