

1 OLIVER BROWN (State Bar No. 335952)
Oliver.Brown@mto.com

2 MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue

3 Fiftieth Floor
Los Angeles, California 90071-3426

4 Telephone: (213) 683-9100

5 Facsimile: (213) 687-3702

6 Attorneys for Motion Picture Association, Inc.

7
8
9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
11

12 In Re 17 U.S.C. § 512(h) Subpoena to
13 CLOUDFLARE, INC.

Case Number: 2:26-mc-13

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

1 I, Larissa Knapp, the undersigned, declare that:

2 1. I am Executive Vice President and Global Chief Content Protection for
3 the Motion Picture Association, Inc. (“MPA”). I submit this declaration on behalf
4 of Columbia Pictures Industries, Inc., Disney Enterprises, Inc., Paramount Pictures
5 Corp., Universal City Studios Productions LLLP, and Warner Bros. Entertainment,
6 Inc. (“ACE Members”), each of which is a member of the Alliance for Creativity
7 and Entertainment (“ACE”). ACE is a global coalition of leading content creators
8 and on-demand entertainment services committed to supporting the legal
9 marketplace for video content and addressing the challenge of online piracy. The
10 ACE Members, whether themselves or through subsidiaries and affiliates, own the
11 copyrights in the below referenced copyrighted works.

12 2. The ACE Members (via the MPA) are requesting issuance of the
13 attached proposed subpoena that would order Cloudflare, Inc. to disclose the
14 identities, including names, physical addresses, IP addresses, telephone numbers, e-
15 mail addresses, payment information, account updates and account histories of the
16 users operating the following websites:

No	Domain	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	cinego.co	Moana	cinego.co/movie/moana-18147/	Venom: The Last Dance	cinego.co/movie/venom-the-last-dance-1630857833/
2	hdfull.org	Moana 2	hdfull.org/pellicula/moana-2	Gladiator 2	hdfull.org/pellicula/gladiator-ii
3	sflix.fi	Tenet	sflix.fi/watch/tenet.18995b#ep=1	Jumanji: The Next Level	sflix.fi/watch/iumanii-the-next-level.d5kv22#ep=1
4	soap2day.fi	Tenet	soap2day.fi/movie/tenet-5oedr#ep=1	Jumanji: The Next Level	soap2day.fi/movie/iumanii-the-next-level-g81kww#ep=1
5	soap2day.day	Moana	soap2day.day/moana-nuq8e-soap2day/	Jumanji: The Next Level	soap2day.day/iumanii-the-next-level-123movies-soap2day/

6	kinox.to	Tenet	kinox.to/Stream/Tenet-1.html	Jumanji: The Next Level	kinox.to/Stream/Jumanji 2 The Next Level.html
7	pelisflix1.help	Nobody 2	pelisflix1.help/pelicula/nadie-2/	Gladiator 2	pelisflix1.help/pelicula/gladiator-ii-7/
8	pelisflix1.best	Nobody 2	pelisflix1.best/pelicula/nadie-2/	Gladiator 2	pelisflix1.best/pelicula/gladiator-ii-7/
9	pelisflix1.club	Nobody 2	pelisflix1.club/pelicula/nadie-2/	Gladiator 2	pelisflix1.club/pelicula/gladiator-ii-7/
10	anime4up.rest	Hi Score Girl S01E01	anime4up.rest/episode/high-score-girl-%d8%a7%d9%84%d8%ad%d9%84%d9%82%d8%a9-1/	Mob Psycho 100 S01E01	anime4up.rest/episode/mobpsycho-100-%d8%a7%d9%84%d8%ad%d9%84%d9%82%d8%a9-1/
11	motchiill.la	Moana 2	motchiill.la/phim/hanh-trinh-cua-moana-2/tap-full	Venom: The Last Dance	motchiill.la/phim/venom-keo-cuoi/tap-full
12	motchillk.la	Moana 2	motchillk.la/phim/hanh-trinh-cua-moana-2/tap-full	Venom: The Last Dance	motchillk.la/phim/venom-keo-cuoi/tap-full
13	motchillk.ac	Moana 2	motchillk.ac/phim/hanh-trinh-cua-moana-2/tap-full	Venom: The Last Dance	motchillk.ac/phim/venom-keo-cuoi/tap-full
14	456movie.net	The Lion King	456movie.net/movie/watch/420818	A Quiet Place	456movie.net/movie/watch/47332
15	hdfilmcehennem i.nl	Tenet	hdfilmcehennem i.nl/tenet-hd-film-izle-hdf-hdf1-19/	Jumanji: The Next Level	hdfilmcehennem i.nl/iumanii-the-next-level-hd-film-izle-hd-hdf-8/
16	vduapk.com	A Quiet Place	vduapk.com/download-vedu-apk51/	Cinderella	vduapk.com/download-vedu-apk51/
17	dizigom104.com	Young Sheldon S01E01	dizigom104.com/young-sheldon-1-sezon-1-bolum-hd1/	Looking for Alaska S01E01	dizigom104.com/looking-for-alaska-1-sezon-1-bolum-hd1/
18	pstream.mov	Tenet	pstream.mov/media/tmdb-	Tangled	pstream.mov/media/tmdb-

4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

15
16
17
18
19
20
21
22
23
24
25
26
27
28

16
17
18
19
20
21
22
23
24
25
26
27
28

17
18
19
20
21
22
23
24
25
26
27
28