

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

In Re 17 U.S.C. §512(h) Subpoena to

CLOUDFLARE, INC.

Case Number: 2:20-mc-00008

**DECLARATION OF JAN VAN VOORN
IN SUPPORT OF ISSUANCE OF
SUBPOENA PURSUANT TO 17 U.S.C §
512(h)**

I, Jan van Voorn, the undersigned, declare that:

1. I am Executive Vice President and Chief of Global Content Protection for the Motion Picture Association, Inc., on behalf of 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 (“ACE Members”) who are members of the Alliance for Creativity and Entertainment (“ACE”), 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. The ACE Members, whether themselves or through subsidiaries and affiliates, own the copyrights in the below referenced copyrighted works.

2. The ACE Members (via the Motion Picture Association, Inc.) are requesting issuance of the attached proposed subpoena that would order Cloudflare, Inc. to disclose the identities, including names, physical addresses, IP addresses, telephone numbers, e-mail

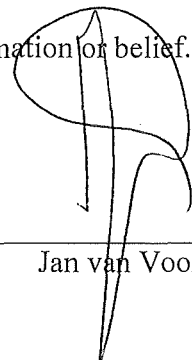
addresses, payment information, account updates and account histories of the users operating the following websites:

Website	Sample Infringing URL	Infringed Work
Clipwatching.com	https://clipwatching.com/embed-2zo2q0dok30p.html	The Lion King (2019)
Fembed.com	https://www.fembed.com/v/4lr02fz-wg4-3101	Daddy's Home 2 (2017)

3. The purpose for which this subpoena is sought is to obtain the identities of the individuals assigned to these websites who have exploited ACE Members' exclusive rights in their copyrighted works without their authorization. This information will only be used for the purposes of protecting the rights granted under Title 17, United States Code.

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 Brussels, Belgium, on January 29, 2020.



Jan van Voorn