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9 Premier League Limited

10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
12 **WESTERN DIVISION**

13 In re 17 U.S.C. § 512(h) Subpoena to  
14 GODADDY.COM, LLC

Case No. 2:24-mc-52

15 **DECLARATION OF TIMOTHY**  
16 **FRANK**

17 1. I am a partner with the law firm Hagan Noll & Boyle LLC, counsel for  
18 The Football Association Premier League Limited (“Premier League”).

19 2. I submit this declaration in support of Premier League’s request for the  
20 Clerk of this Court to issue a subpoena to GoDaddy.com, LLC (“GoDaddy”)  
21 pursuant to 17 U.S.C. § 512(h). Premier League owns copyrights in broadcasted  
22 Premier League football (soccer) matches, including the right to publicly perform  
23 those copyrighted works, that are being infringed through the use of domain names  
24 registered with GoDaddy, as set forth in Premier League’s notification of claimed  
25 infringement.

26 3. The purpose for which the subpoena is sought is to obtain the identity  
27 of an alleged infringer of Premier League’s copyrights and such information will only  
28 be used for the purpose of protecting rights under Title 17, United States Code.

I declare under penalty of perjury that the foregoing is true and correct.

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Executed on April 16, 2024.

/s/ Timothy M. Frank  
Timothy M. Frank