



Matthew Schneider  
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Plaintiff in Pro Per

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

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

Case No.: MC25-89-UA  
**DECLARATION OF MATTHEW  
SCHNEIDER IN SUPPORT OF  
ISSUANCE OF SUBPOENA  
PURSUANT TO 17 U.S.C. § 512(h)**

I, Matthew Schneider, the undersigned, declare that:

1. I am a filmmaker and the copyright owner of certain audiovisual works, including film and related materials. I submit this declaration in support of my request for 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:

**Exhibit 1: Infringing Titles**

No	Infringing Website	Infringed Title	Infringing URL
1	<a href="https://passthepopcorn.me/">https://passthepopcorn.me/</a>	Split: A Film Anthology	<a href="https://passthepopcorn.me/torrent.php?id=6843191">https://passthepopcorn.me/torrent.php?id=6843191</a>
2	<a href="https://passthepopcorn.me/">https://passthepopcorn.me/</a>	Do Us Part	<a href="https://passthepopcorn.me/torrent.php?id=586257">https://passthepopcorn.me/torrent.php?id=586257</a>
3	<a href="https://passthepopcorn.me/">https://passthepopcorn.me/</a>	Orlando Gloom - Always the Same	<a href="https://passthepopcorn.me/torrent.php?id=592476">https://passthepopcorn.me/torrent.php?id=592476</a>
4	<a href="https://broadcastthe.net/">https://broadcastthe.net/</a>	Split: A Film Anthology	<a href="https://broadcastthe.net/torrents/285320">https://broadcastthe.net/torrents/285320</a>
5	<a href="https://broadcastthe.net/">https://broadcastthe.net/</a>	Do Us Part	<a href="https://broadcastthe.net/torrents/294646">https://broadcastthe.net/torrents/294646</a>
6	<a href="https://broadcastthe.net/">https://broadcastthe.net/</a>	Orlando Gloom - Always the Same	<a href="https://broadcastthe.net/torrents/834542">https://broadcastthe.net/torrents/834542</a>
7	<a href="https://karagarga.in/">https://karagarga.in/</a>	Split: A Film Anthology	<a href="https://karagarga.in/details.php?id=930674">https://karagarga.in/details.php?id=930674</a>
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10	<a href="https://beyond-hd.me/">https://beyond-hd.me/</a>	Split: A Film Anthology	<a href="https://beyond-hd.me/t/1175399">https://beyond-hd.me/t/1175399</a>
11	<a href="https://beyond-hd.me/">https://beyond-hd.me/</a>	Do Us Part	<a href="https://beyond-hd.me/t/936368">https://beyond-hd.me/t/936368</a>
12	<a href="https://beyond-hd.me/">https://beyond-hd.me/</a>	Orlando Gloom - Always the Same	<a href="https://beyond-hd.me/t/26395">https://beyond-hd.me/t/26395</a>
13	<a href="https://hdbits.org/">https://hdbits.org/</a>	Split: A Film Anthology	<a href="https://hdbits.org/torrents.php?id=9432">https://hdbits.org/torrents.php?id=9432</a>
14	<a href="https://hdbits.org/">https://hdbits.org/</a>	Do Us Part	<a href="https://hdbits.org/torrents.php?id=825375">https://hdbits.org/torrents.php?id=825375</a>
15	<a href="https://hdbits.org/">https://hdbits.org/</a>	Orlando Gloom - Always the Same	<a href="https://hdbits.org/torrents.php?id=582572">https://hdbits.org/torrents.php?id=582572</a>
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18	<a href="https://bibliotik.me/">https://bibliotik.me/</a>	Orlando Gloom - Always the Same	<a href="https://bibliotik.me/torrents/398374">https://bibliotik.me/torrents/398374</a>

2. A true and correct copy of the DMCA Notice sent on my behalf by counsel to Cloudflare is attached as Schedule 1
3. Upon information and belief, Cloudflare provides services that enable the unauthorized reproduction and distribution of my copyrighted works using the infringing URLs identified in the DMCA Notice. The infringing websites listed therein have exploited my exclusive rights in these copyrighted works without my authorization.
4. The sole purpose of this subpoena is to obtain the identities of the individuals responsible for operating the infringing websites described in the DMCA Notice, who have unlawfully exploited my exclusive rights, and such information will be used solely for the purpose of protecting and enforcing my rights under Title II of the Digital Millennium Copyright Act.

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, and belief.

Executed at Sanborn New York, on August 27, 2025.

**Matthew Schneider /s/**  
Plaintiff in Pro Per

# Schedule 1: Notification to Cloudflare

August 27, 2025

## Via Email

Cloudflare, Inc.

Attn: Legal Department

101 Townsend St.

San Francisco, CA 94107

[abuseddocuments@cloudflare.com](mailto:abuseddocuments@cloudflare.com)

[abuse+law@cloudflare.com](mailto:abuse+law@cloudflare.com)

## **Re: Notice of Copyright Infringement & DMCA Violations**

Dear Sir or Madam:

I write to you on behalf of my client, Matthew Schneider concerning an urgent matter of copyright infringement in connection with Cloudflare's services that requires your immediate attention.

Mr. Schneider is a filmmaker and creative professional who owns and controls copyrights in his works, including film, video, and related audiovisual material. We have identified unauthorized reproductions and distributions of Mr. Schneider's copyrighted works being hosted and transmitted through websites and services that rely upon Cloudflare's infrastructure. Such acts of reproduction and distribution are unauthorized, plainly unlawful, and cause ongoing and irreparable harm to my client.

We hereby demand that Cloudflare immediately and permanently disable access to the infringing material identified herein and in Exhibit 1 (attached), which provides a representative (but non-exhaustive) list of infringing URLs and works. This request is made pursuant to the Digital Millennium Copyright Act ("DMCA"), 17 U.S.C. §512.

Additionally, we request that Cloudflare take appropriate steps to ensure its services are not used to facilitate continued infringement, including by reasonably enforcing its repeat infringer policies.

I state that I have a good faith belief that the use of the copyrighted material described herein is not authorized by the copyright owner, his agents, or the law. The information contained in this notice is accurate, and I swear, under penalty of perjury, that I am authorized to act on behalf of Mr. Schneider, the rights holder whose exclusive rights are being infringed.

We therefore give notice of these activities and demand that you expeditiously remove or disable access to the infringing material described, thereby preventing the illegal reproduction and distribution of my client's copyrighted works through Cloudflare's services.

This notice is not a complete statement of Mr. Schneider's rights, and nothing herein shall be construed as a waiver of any rights, claims, or remedies available under law, all of which are expressly reserved.

Thank you for your prompt attention to this matter.

Respectfully,

David Bernstein /s/

Attorney at Law

Counsel for Matthew Schneider

**ATTACHMENT 1**

**YOU ARE COMMANDED TO PRODUCE AT THE TIME, DATE, AND PLACE SET FORTH IN THE SUBPOENA THE FOLLOWING DOCUMENTS, ELECTRONICALLY STORED INFORMATION, OR OBJECTS, AND TO PERMIT INSPECTION, COPYING, TESTING, OR SAMPLING OF THE MATERIAL:**

1. Documents or ESI containing identifying information for each Cloudflare user account associated with each of the URLs listed below (collectively, the “Infringing URLs”), including without limitation name(s), last known address(es), last known telephone and/or cell phone number(s), any and all email address(es); account number(s); billing information (including, but not limited to, names, telephone number(s), and mailing and billing address(es) of each of all of the payment methods (including, but not limited to, credit cards, bank accounts, and any online payments system), hosting provider(s), server(s), any other contact information and any and all logs of IP address(es), relating to each individual or business entity that operates or owns each of the Infringing URLs, and each individual or business entity that has hosted content, uploaded content, and/or has contracted with others to upload or host content using the Infringing URLs, from any and all sources, including without limitation billing or administrative records with timestamps from the time of the registration of each Infringing URL until the date of this subpoena.

2. All access log information (IP addresses, corresponding port numbers, corresponding dates and times, access type, and corresponding destination IP addresses) relating to each of the Infringing URLs listed below.

**Infringing URLs:**

- <https://passthepopcorn.me/>
- <https://broadcastthe.net/>
- <https://karagarga.in/>
- <https://beyond-hd.me/>
- <https://hdbits.org/>

## Exhibit 1: Infringing Titles

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## UNITED STATES DISTRICT COURT

for the

Central District of California

In re DMCA 512(h) Subpoena to Cloudflare Inc.

*Plaintiff*

v.

*Defendant*

Civil Action No.

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

Cloudflare, Inc.

Attn: Legal Department, 101 Townsend Street, San Francisco, CA 94107

*(Name of person to whom this subpoena is directed)*

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: SEE ATTACHMENT 1 and EXHIBIT 1.

Place: By email to: matthew.schneider94@gmail.com; or at  
STE E-6420 Inducon Drive W, Sanborn, NY  
14132

Date and Time:

08/27/2025 10:30 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

CLERK OF COURT

OR

*Signature of Clerk or Deputy Clerk**Attorney's signature*The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* \_\_\_\_\_

Matthew Schneider (Plaintiff in Pro Per) \_\_\_\_\_, who issues or requests this subpoena, are:

STE E-6420 Inducon Drive W, Sanborn, NY, 14132, matthew.schneider94@gmail.com, (716) 739-6298

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_.

☐ I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:



**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.