

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ATLANTIC RECORDING CORPORATION;
ATLANTIC MUSIC GROUP LLC; BAD
BOY RECORDS LLC; ELEKTRA
ENTERTAINMENT LLC; ELEKTRA
ENTERTAINMENT GROUP INC.; FUELED
BY RAMEN LLC; WARNER MUSIC
INTERNATIONAL SERVICES LIMITED;
WARNER RECORDS INC.; WARNER
RECORDS LLC; SONY MUSIC
ENTERTAINMENT; ARISTA MUSIC;
ARISTA RECORDS, LLC; ZOMBA
RECORDING LLC; UMG RECORDINGS,
INC.; CAPITOL RECORDS, LLC; and
SPOTIFY USA INC.,

Plaintiffs,

v.

ANNA'S ARCHIVE and DOES 1-10,

Defendants.

No. 26-cv-00002 (JSR)

**REPLY DECLARATION OF
ROLLIN A. RANSOM IN SUPPORT
OF THE RECORD COMPANY
PLAINTIFFS' MOTION FOR AN
EMERGENCY *EX PARTE*
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE RE: PRELIMINARY
INJUNCTION**

[FILED UNDER SEAL]

I, Rollin A. Ransom, declare and state, pursuant to 28 U.S.C. § 1746 and Local Civil Rule 1.9 of the United States District Courts for the Southern and Eastern Districts of New York, that the following is true and correct:

1. I am an attorney at law, duly licensed and entitled to practice in the States of California, New York, and Illinois. I am a partner at Sidley Austin LLP, counsel for Plaintiffs Atlantic Recording Corporation, Atlantic Music Group LLC, Bad Boy Records LLC, Elektra Entertainment Group Inc., Elektra Entertainment LLC, Fueled By Ramen LLC, Warner Music International Services Limited, Warner Records Inc., Warner Records LLC, Sony Music Entertainment, Arista Music, Arista Records, LLC, Zomba Recording LLC, UMG Recordings,

Inc., and Capitol Records, LLC (collectively, the “Record Company Plaintiffs”) and Spotify USA Inc. (“Spotify,” and together with the Record Company Plaintiffs, “Plaintiffs”). I make this reply declaration in support of the Record Company Plaintiffs’ Motion for an Emergency *Ex Parte* Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction. I have personal knowledge of, and if called as a witness, could testify to the following facts.

2. On January 2, 2026, the Court issued a Temporary Restraining Order and Order to Show Cause re: Preliminary Injunction (the “TRO Order”) in this action.

3. I gave notice of the TRO Order to Public Interest Registry (“PIR”) and Cloudflare Inc. (“Cloudflare”) on January 2, 2026. I am informed and believe that PIR took action to “lock” the annas-archive.org domain name on January 2, 2026, which resulted in the inability of users to reach the website maintained at that domain name. I am further informed and believe that Cloudflare suspended providing services to Anna’s Archive, including disabling the authoritative nameservers for annas-archive.li and annas-archive.se, on January 3, 2026, which resulted in the temporary inability of users to reach the websites maintained at those domain names.

4. In the TRO Order, the Court authorized service of process and all other documents in this action (including the TRO Order) on defendant Anna’s Archive (“Anna’s Archive”) by electronic mail, and required that such service take place within two (2) business days following the completion by PIR and Cloudflare of the actions described above. As reflected in proofs of service filed with this Court on January 5, 2026, I served the Summons and Complaint, the TRO Order, and all other documents that had been filed in this action on Anna’s Archive by email to ArchivistAnna3+7oBz9nJ+nt@proton.me and annadmca@proton.me on January 3, 2026. I did not receive any “bounceback” or any other indication that these emails were not successfully delivered to the above-referenced email addresses.

5. I am informed and believe that, after Cloudflare suspended providing services to Anna's Archive, Anna's Archive retained a different internet service provider, namely, Njalla SRL ("Njalla"), to provide the "nameserver" services that Cloudflare had been providing, such that the websites maintained at annas-archive.li and annas-archive.se were again accessible to users, at least for certain periods of time (as of the signing of this Declaration, annas-archive.li is accessible, while annas-archive.se is not). I am further informed and believe that Anna's Archive has also activated additional "mirror" websites at annas-archive.pm and annas-archive.in, for which Njalla also provides nameserver services. These websites have content identical to the websites that were or are maintained at annas-archive.li and annas-archive.se, including "torrent" files containing the metadata and album cover art respecting the Record Company Plaintiffs' sound recordings that Anna's Archive illegally "scraped" from Spotify. Pages from the above-referenced websites are attached hereto as follows:

a. **Exhibit A** is a true and correct copy of the homepage of annas-archive.li, available at <https://annas-archive.li>, and last visited on January 14, 2026.

b. **Exhibit B** is a true and correct copy of the homepage of annas-archive.pm, available at <https://annas-archive.pm>, and last visited on January 14, 2026.

c. **Exhibit C** is a true and correct copy of the homepage of annas-archive.in, available at <https://annas-archive.in>, and last visited on January 14, 2026.

6. In addition to the notice of the TRO Order that I provided to PIR and Cloudflare, either I or persons acting at my direction have given notice of the TRO Order to other domain name registries and registrars and hosting and internet service providers for Anna's Archive Websites, including Njalla (nameserver services); Switch Foundation (registry); The Swedish Internet Foundation (registry); National Internet Exchange of India (registry); IQWeb FZ-LLC

(hosting provider); and Hosting Concepts B.V. (registrar). I am further informed and believe that Immaterialism Ltd. (“Inmaterialism”) is the registrar for the annas-archive.li domain name, and that Tucows Domains Inc. (“Tucows”) is the registrar for the annas-archive.in domain name. If a preliminary injunction is issued, I will promptly give notice of such preliminary injunction to Immaterialism and Tucows as well, along with the other third-party entities identified above.

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

Executed on January 14, 2026, in New York, New York.



Rollin A. Ransom

EXHIBIT A

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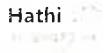
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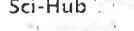
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