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10 Attorneys for Plaintiff  
11 Shueisha Inc.

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15 In Re 17 U.S.C. § 512(h) Subpoena to  
16 X CORP.

Case No.:

**DECLARATION OF HIROYUKI  
NAKAJIMA IN SUPPORT OF SUBPOENA  
TO OBTAIN THE IDENTITY OF AN X  
CORP. CUSTOMER PURSUANT TO 17  
U.S.C. § 512(h)**

17 I, Hiroyuki Nakajima, declare as follows:

18 1. I am an attorney with the law firm Tokyo Flex Law Office, copyright counsel for  
19 Shueisha Inc. (“Shueisha”). I make this declaration in support of Shueisha’s request for the clerk of  
20 the District Court for the Northern District of California to issue the subpoena filed concurrently  
21 herewith pursuant to the Digital Millennium Copyright Act (DMCA), 17 U.S.C. § 512(h). I have  
22 personal knowledge of the facts stated in this Declaration and if called to do so, would testify  
23 competently thereto.

24 2. I am duly authorized by Shueisha to make this request on Shueisha’s behalf.

25 3. Shueisha is a leading entertainment publishing company headquartered in Japan.

26 Among other things, the company specializes in the publication and distribution of Japanese comics  
27  
28

1 known as “mangas,” in both tangible and digital media. Numerous titles published by Shueisha have  
2 achieved a high degree of popularity worldwide, including in the United States.

3 4. Shueisha recently discovered that some of its mangas, to which Shueisha owns the  
4 copyrights, have been in whole or in part copied, published, displayed, and/or distributed without its  
5 authorization by anonymous internet users using the social media platform “X” platform (formerly  
6 known as Twitter) owned and operated by X Corp. URLs containing the infringing content are  
7 identified in the DMCA notice Shueisha sent to X Corp. on May 2, 2024, a true and correct copy of  
8 which is attached hereto as **Schedule 1** (the “DMCA Notice”).

9 5. Upon information and belief, X. Corp. provides content delivery services enabling  
10 the unauthorized reproduction and distribution of Shueisha’s copyrighted works using the URLs  
11 identified in the DMCA Notice.

12 6. Upon information and belief, X Corp.’s policies require a subpoena or court order to  
13 compel the company to disclose information about an X user or account used in furtherance of the  
14 infringement of another’s copyrights.

15 7. The sole purpose for which the requested subpoena is sought is to obtain the  
16 identities of the alleged infringer(s) described in the DMCA Notice and such information will only  
17 be used for the purpose of protecting Shueisha’s copyright rights.

18  
19 I declare under penalty of perjury under the laws of the United States of America and the  
20 State of California that the foregoing is true and correct.

21  
22 Executed on December 21, 2024 in Tokyo, Japan.

23  
24 By: *Hiroyuki Nakajima*  
25 Hiroyuki Nakajima  
26  
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