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5 Attorneys for Motion Picture Association, Inc.  
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9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
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12 In Re 17 U.S.C. § 512(h) Subpoena to  
13 CLOUDFLARE, INC.

Case Number: 2:22-mc-00044

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

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

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22 1. I am Executive Vice President and Chief of Global Content Protection  
23 for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on  
24 behalf of Columbia Pictures Industries, Inc., Disney Enterprises, Inc., Paramount  
25 Pictures Corporation, Universal City Studios Production LLLP, and Warner Bros.  
26 Entertainment, Inc. (“ACE Members”), each of which is a member of the Alliance  
27 for Creativity and Entertainment (“ACE”). ACE is a global coalition of leading  
28 content creators and on-demand entertainment services committed to supporting the

1 legal marketplace for video content and addressing the challenge of online piracy.  
2 The ACE Members, whether themselves or through subsidiaries and affiliates, own  
3 the copyrights listed in the attached **Exhibit A**.

4 2. The ACE Members (via the Motion Picture Association, Inc.) are  
5 requesting issuance of the attached proposed subpoena that would order Cloudflare,  
6 Inc. to disclose the identities, including names, physical addresses, IP addresses,  
7 telephone numbers, e-mail addresses, payment information, account updates and  
8 account histories of the users operating the websites listed in the attached **Exhibit A**.

9 3. The purpose for which this subpoena is sought is to obtain the identities  
10 of the individuals assigned to these websites who have exploited ACE Members'  
11 exclusive rights in their copyrighted motion pictures without their authorization.  
12 This information will only be used for the purposes of protecting the rights granted  
13 to ACE Members, the motion picture copyright owners, under Title II of the Digital  
14 Millennium Copyright Act.

15  
16 I declare under penalty of perjury under the laws of the United States of  
17 America that the foregoing is true and correct to the best of my knowledge,  
18 information or belief.

19 Executed at Redondo Beach, California, on March 4, 2022.

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Jan van Voorn

**EXHIBIT A**

	<b>Domain</b>	<b>Sample 1 Infringed Title</b>	<b>Sample 1 Infringing URL</b>	<b>Sample 2 Infringed Title</b>	<b>Sample 2 Infringing URL</b>
1	hdss.nu	Hobbs & Shaw	hdss.nu/fast-furious-8-5-hobbs-shaw-a/	Bad Boys for Life	hdss.nu/bad-boys-for-life/
2	filmesonline.org	Godzilla vs Kong	filmesonline.org/filmes/godzilla-vs-kong/	Soul	filmesonline.org/filmes/soul-uma-aventura-com-alma-online-dublado-e-legendado-em-hd-1080p-gratis/
3	megafilmeshd20.pro	Godzilla vs Kong	megafilmeshd20.pro/assistir-filmes/godzilla-vs-kong-6.html/	A Quiet Place Part II	megafilmeshd20.pro/assistir-filmes/um-lugar-silencioso-25.html/
4	filmesonlinegratisbr.xyz	Godzilla vs Kong	filmesonlinegratisbr.xyz/media/assistir-online-godzilla-vs-kong/	Soul	filmesonlinegratisbr.xyz/media/assistir-online-soul/
5	superfilmesonline.pro (films open to mundotec.pro)	Godzilla vs Kong	superfilmesonline.pro/filme-godzilla-vs-kong-dublado-hd/	Soul	superfilmesonline.pro/filme-soul-dublado/
6	filmesonline.org	A Quiet Place Part II	filmesonline.org/assistir-um-lugar-silencioso-parte-ii-online-gratis	Soul	filmesonline.org/assistir-soul-online-gratis
7	zfilmesonline.net	A Quiet Place Part II	zfilmesonline.net/filme/4assistir-um-lugar-silencioso-parte-2-dublado-legendado-hd/	Soul	zfilmesonline.net/filme/assistir-soul/
8	onionplay.se	Spider-Man: Far from Home	onionplay.se/movies/spider-man-far-from-home-2019/	Hobbs & Shaw	onionplay.se/movies/fast-furious-presents-hobbs-shaw-2019/
9	imapple.tv	Law & Order: Season 20	imapple.tv/voddetail/407308.html	Naomi	imapple.tv/voddetail/392910.html
10	SSphim.net	Frozen II	ssphim.net/p/xem-phim-nu-hoang-bang-gia-2-frozen-2	Jumanji: The Next Level	ssphim.net/p/xem-phim-jumanji-tro-choiky-ao-thang-cap-jumanji-the-next-level
11	btnull.org	Godzilla vs Kong	btnull.org/mv/9y5j.html	Encanto	btnull.org/mv/GyM3.html
12	pttplay.cc	Wonder Woman 1984	pttplay.cc/v/99380-2-1.html	Cruella	pttplay.cc/v/184015-5-1.html

	Domain	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
13	idlix.cc	Wonder Woman 1984	idlix.cc/movie/wonder-woman-1984-2020/	Encanto	idlix.cc/movie/encanto-2021/
14	filmpalast.to	Tenet	filmpalast.to/stream/tenet	Bad Boys for Life	filmpalast.to/stream/bad-boys-for-life
15	ummagurau.com	Spider-Man: No Way Home	ummagurau.com/watch-movie/spider-man-no-way-home-71326.5601538	Raya and the Last Dragon	ummagurau.com/watch-movie/raya-and-the-last-dragon-66700.4791574
16	tamilblasters.com	Space Jam: A New Legacy	tamilblasters.com/index.php?/forums/topic/28677-space-jam-a-new-legacy-2021-english-hd-watch-online/&tab=comments#comment-85662	Raya and the Last Dragon	tamilblasters.com/index.php?/forums/topic/29236-raya-and-the-last-dragon-2021-hd-watch-online/&tab=comments#comment-86451
17	watchmovierulz.co	Spider-Man: No Way Home	watchmovierulz.co/spider-man-no-way-home-2021-english/full-movie-watch-online-free-11-4564.html	Raya and the Last Dragon	watchmovierulz.co/raya-and-the-last-dragon-2021-english/full-movie-watch-online-free-67-3429.html
18	extramovies.wine	Spider-Man: No Way Home	extramovies.wine/extrastream.php?url=r2-1qfer387r8wq	Raya and the Last Dragon	extramovies.wine/extrastream.php?url=158g6tj2kgz7pzw
19	Vizjer.com	Hobbs & Shaw	vizjer.com/film/szybcy-i-wsciekli-hobbs-i-shaw-fast-furious-presents-hobbs-shaw-2019	Encanto	vizjer.com/film/nasze-magiczne-encanto-encanto-2021
20	Vizjer.pl	Hobbs & Shaw	vizjer.pl/film/szybcy-i-wsciekli-hobbs-i-shaw-fast-furious-presents-hobbs-shaw-2019	Encanto	vizjer.pl/film/nasze-magiczne-encanto-encanto-2021
21	layarkacaxxi.icu	Wonder Woman 1984	layarkacaxxi.icu/v/yx8wpuep1e60e4j	Hobbs and Shaw	layarkacaxxi.icu/v/yx8wpueex4xln16
22	moviemocha.com	Tenet	moviemocha.com/?r=movie_view&id=22672	A Quiet Place Part II	moviemocha.com/?r=movie_view&id=26142

Title	US Copyright Holder(s)
A Quiet Place Part II	Paramount Pictures Corporation
Cruella	Disney Enterprises, Inc.
Encanto	Disney Enterprises, Inc.
Frozen II	Disney Enterprises, Inc.
Godzilla vs Kong	Warner Bros. Entertainment Inc.
Soul	Disney Enterprises, Inc.
Tenet	Warner Bros. Entertainment Inc.
Hobbs & Shaw	Universal City Studios Productions LLLP
Bad Boys for Life	Columbia Pictures Industries, Inc.
Spider-Man: Far from Home	Columbia Pictures Industries, Inc.
Wonder Woman 1984	Warner Bros. Entertainment Inc.
Law & Order: Season 20	Universal Network Television LLC
Naomi	Warner Bros. Entertainment Inc.
Jumanji: The Next Level	Columbia Pictures Industries, Inc.
Raya and the Last Dragon	Disney Enterprises, Inc.
Spider-Man: No Way Home	Columbia Pictures Industries, Inc.; Marvel Characters, Inc.
Space Jam: A New Legacy	Warner Bros. Entertainment Inc.