



Mr. Jan van Voorn
Executive Vice President & Chief of Global
Content Protection,
Motion Picture Association, Inc.,
On Behalf of the Alliance for Creativity and
Entertainment

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May 23, 2022

VIA EMAIL
legal@cloudflare.com; abuse+law@cloudflare.com
Justin Paine, Cloudflare, Inc.
101 Townsend Street Legal Department
San Francisco, CA 94107

Re: Notice of Infringement Regarding Certain Cloudflare Users

Dear Mr. Paine:

I am writing on behalf of the Alliance for Creativity and Entertainment ("ACE").

ACE is a global coalition of leading content creators and on-demand entertainment services committed to supporting the legal marketplace for video content and addressing the challenge of online piracy. ACE includes some of the world's largest and most respected motion picture and television rights owners including, among many others, Paramount Pictures Corporation, Sony Pictures Entertainment Inc., Universal City Studios LLC, Walt Disney Studios Motion Pictures, Warner Bros. Entertainment Inc., Amazon Content Services LLC and Netflix Studios, LLC (together, the "ACE Members").

ACE is organized for the purpose of preventing and mitigating online theft of copyrighted films and television programs, and undertakes initiatives to identify and take action against piracy threats to create an online environment in which copyrighted film and television content is more secure and online content theft can be addressed more effectively and efficiently.

The ACE Members, whether themselves or through subsidiaries and affiliates, own or are the exclusive licensees of copyrights in a vast library of motion pictures and television programs (the "Copyrighted Works").





We have determined that users of your system or network have infringed certain ACE Members' Copyrighted Works referenced in the attached **Exhibit A**

Enclosed is a subpoena compliant with the Digital Millennium Copyright Act. The subpoena requires that you provide information concerning the individuals offering infringing material described in the attached notice. As is stated in the attached subpoena, you are required to disclose to the Motion Picture Association, Inc. (on behalf of the ACE Members) information sufficient to identify the infringers. This would include the individuals' names, physical addresses, IP addresses, telephone numbers, e-mail addresses, payment information, account updates and account history.

We are providing this notice based on our good faith belief that the use of motion pictures and television programs owned by the ACE Members in the manner occurring via the websites identified below is not authorized by the copyright owners, their agents, or the law. The information in this notification is accurate and, under penalty of perjury, we are authorized to act on behalf of the ACE Members, which own or control exclusive rights under copyright that are being infringed in the manner described herein. This letter is without prejudice to the rights and remedies of the ACE Members, including to recover damages and any other claims for relief, all of which are expressly reserved.

If you have any questions, please contact me at (818) 995-6600, or via email at Jan_vanVoorn@motionpictures.org.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jan van Voorn", is written over a horizontal line. The signature is stylized and somewhat abstract.

Attachment and Enclosure



EXHIBIT A

	Domain	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
1	123moviesfree.so	Morbius	123moviesfree.so/film/morbius/watching.html?ep=0	Minions	123moviesfree.so/film/minions-zrg/watching.html?ep=0
2	123movieshub.tc	Frozen	123movieshub.tc/movie/frozen/watching.html?ep=1&sv=8	Spider-Man: Homecoming	123movieshub.tc/movie/spider-man-homecoming-6d0gwo2/watching.html?ep=1&sv=8
3	123watchmovies.co	Mortal Kombat	123watchmovies.co/mortal-kombat-2/	The Lion King	123watchmovies.co/the-lion-king-2/
4	2embed.ru	Frozen II	2embed.ru/library/movie/330457	Spider-Man: Far from Home	2embed.ru/library/movie/429617
5	blogdepelis.io	The Matrix Resurrections	blogdepelis.io/matrix-resurrecciones.html	Soul	blogdepelis.io/soul.html
6	cine-calidad.com	The Matrix Resurrections	v3.cine-calidad.com/ver-pelicula/matrix-resurrecciones/	Soul	v3.cine-calidad.com/ver-pelicula/soul/
7	cliver.me	The Matrix Resurrections	cliver.me/pelicula/matrix-resurrecciones	Soul	cliver.me/pelicula/soul
8	cuevana.pro	The Matrix Resurrections	cuevana.pro/pelicula/matrix-resurrecciones	Soul	cuevana.pro/pelicula/soul
9	cuevana3.cc	The Matrix Resurrections	ver.cuevana3.cc/peliculas/linea-matrix-resurrecciones/	Soul	ver.cuevana3.cc/peliculas/soul-2020/
10	d123movies.to	Morbius	d123movies.to/watch-movie-2/morbius-2022_cw4y0d0ez/45wolw6-full-movie-free-online	Minions	d123movies.to/watch-movie-2/minions-2015_cwobl6m8k/o7oey7-full-movie-free-online
11	dytt89.com	Godzilla vs Kong	dytt89.com/i/103400.html	Raya and the Last Dragon	dytt89.com/i/103295.html
12	ffmovies.sc	Morbius	vw1.ffmovies.sc/film/morbius-2022/	Minions	vw1.ffmovies.sc/film/minions-2015/
13	pelisplay.co	Mortal Kombat	pelisplay.co/pelicula/mortal-kombat-2	Godzilla Vs. Kong	pelisplay.co/pelicula/godzilla-vs-kong
14	putlockers.li	Morbius	putlockers.li/movie/morbius-2022_MlpSRHBHRDZ1UXM9/watch.htm	Minions	putlockers.li/movie/minions-2015_aVcveC9JVjZWNlk9/watch.html

	Domain	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
15	repelis.red	The Matrix Resurrections	repelis.red/ver-matrix-resurrecciones-online-espanol-022622/	Soul	repelis.red/ver-soul-online-espanol-092721/
16	repelis24.co	The Matrix Resurrections	repelis24.co/pelicula/matrix-resurrecciones-2021-online-descargar/	Soul	repelis24.co/pelicula/soul-2020-online-descargar/
17	seriesflix.video	Dark: Season 2	seriesflix.video/episodio/dark-2x1/	The Boys	seriesflix.video/episodio/the-boys-2x2/
18	hackstore.la (videos play on suzihaza.com)	The Matrix Resurrections	hackstore.la/peliculas/matrix-resurrecciones-2021/	Soul	hackstore.la/peliculas/soul-2020/
19	suzihaza.com	The Matrix Resurrections	suzihaza.com/v/16rn5fj11q35x7d	Soul	suzihaza.com/v/05864ulg43xjn0k
20	televisionlibre.net	Cruella	televisionlibre.net/pelicula/cruella-2021/	Wonder Woman	televisionlibre.net/pelicula/mujer-maravilla-2017/
21	we-play.live	Frozen II	we-play.live/watching/movie/frozen-ii-2019	A Quiet Place Part II	we-play.live/watching/movie/a-quiet-place-part-ii-2021
22	ymovies.to	Frozen II	ymovies.to/film/frozen-ii-83235/	Minions	ymovies.to/film/minions-41563/watching/
23	bflix.watch	Morbius	bflix.watch/movie/morbius-2022/	Minions	bflix.watch/movie/minions-2015/
24	123moviesfree.love	Morbius	123moviesfree.love/watch-movie/morbius-2022-full-movie-online-free/123movies-8mnl5lpwy-m3jmwg9	Minions	123moviesfree.love/watch-movie/minions-2015-full-movie-online-free/123movies-vgn3z09z-vgbgwrxx?watchnow=1
25	pelis24.se	The Matrix Resurrections	pelis24.se/pelicula/matrix-resurrecciones/	Soul	pelis24.se/pelicula/soul/