



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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Sherman Oaks, CA 91403
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April 10, 2023

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 via the below-referenced Websites:

No	Domain	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	thesoap2day.com	Harry Potter and the Sorcerer's Stone	thesoap2day.com/movies/harry-potter-and-the-chamber-of-secrets/	Strange World	thesoap2day.com/movies/strange-world-11XYQA/
2	tor.cat	Sonic the Hedgehog 2	dontorufwmbqhnoe2wvko5ynis6axf7bqod6wkmdvxmjyek64tantlqd.onion/pelicula/25278/Sonic-2-La-pelcula	Cruella	dontorufwmbqhnoe2wvko5ynis6axf7bqod6wkmdvxmjyek64tantlqd.onion/pelicula/23106/Cruella
3	thepiratebay.org	Sonic the Hedgehog 2	thepiratebay.org/description.php?id=5791643	Cruella	thepiratebay.org/description.php?id=46243065
4	cuevana2.biz	The Batman	cuevana2.biz/pelicula/batman	Encanto	cuevana2.biz/pelicula/encanto
5	cuevana3.ai	The Batman	cuevana3.ai/55046/the-batman	Encanto	cuevana3.ai/51844/encanto
6	cuevana3.mu	The Batman	cuevana3.mu/pelicula/the-batman-2022/	Encanto	cuevana3.mu/pelicula/encanto-2021-3/
7	compucaliv.com	The Batman	compucaliv.com/batman-2022-hd-1080p-720p-latino/	Encanto	compucaliv.com/encanto-2021-hd-1080p-720p-latino-dual/
8	seriesflix.is	The Big Bang Theory S01E01	seriesflix.is/capitulo/the-big-bang-theory-temporada-1-capitulo-1/	Once Upon a Time S01E01	seriesflix.is/capitulo/erase-una-vez-temporada-1-capitulo-1/
9	filmisub.com	Shaft	filmisub.com/filmi/58265-shaft-shaft-2019.html	Frozen II	filmisub.com/filmi/58286-frozen-2-zamrzaloto-kralstvo-2-2019.html





10	filmi7.com	Shaft	filmi7.com/filmi/58265-shaft-shaft-2019.html	Frozen II	filmi7.com/filmi/58286-frozen-2-zamrznaloto-kralstvo-2-2019.html
11	fmoviesfree.to	Encanto	fmoviesfree.to/film/encanto-2021/	Tenet	fmoviesfree.to/film/tenet-2020/
12	topflix.fm	Godzilla vs Kong	topflix.fm/player/share_vi/?code=4594265141&muuid=1533&url=/movies/p4/89401236godzilla-vs-kongkong-2021.mp4&mediaType=filme&mediaName=Godzilla%20vs%20Kong&idfy=1&Inc=n&vid=0247669761&out=null&webv=nao&cdn=	Encanto	topflix.fm/player/share_vi/?code=3482166521&muuid=1592&url=/movies/p4/46982236encanto.mp4&mediaType=filme&mediaName=Encanto&idfy=1&Inc=n&vid=9467669761&out=null&webv=nao&cdn=
13	filmeshtorrent.com	Godzilla vs Kong	filmeshtorrent.com/godzilla-vs-kong-2021/	Encanto	filmeshtorrent.com/encanto-2021/

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 be "Jan van Voorn".

Jan van Voorn

Attachment and Enclosure

