

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED KING FILM DISTRIBUTION LTD, D.B.S. :
SATELLITE SERVICES (1998) LTD, HOT :
COMMUNICATION SYSTEMS LTD, CHARLTON :
LTD, RESHET MEDIA LTD, AND KESHET :
BROADCASTING LTD, :

Plaintiffs,

-- against --

DOES 1-10, d/b/a **Israel.tv**,

Defendants.

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Case No. 1:21-cv-11024-KPF-RWL

**REPLY DECLARATION OF
MARK S. KAUFMAN
IN FURTHER SUPPORT OF
PLAINTIFFS’ MOTION FOR
CONTEMPT AGAINST
CLOUDFLARE, INC.
AND FOR EMERGENCY
RELIEF**

MARK S. KAUFMAN declares the following, under penalty of perjury:

1. I am an attorney duly licensed to practice law in this court, a partner at Kaufman & Kahn, LLP, attorneys of record for Plaintiffs United King Film Distribution Ltd, D.B.S. Satellite Services (1998) Ltd, Hot Communication Systems Ltd, Charlton Ltd, Reshet Media Ltd, and Keshet Broadcasting Ltd (“**Plaintiffs**”), and submit this reply declaration in further support of Plaintiffs’ expedited contempt motion for CloudFlare, Inc.’s violation of the Court’s Order for Default Judgment and Permanent Injunction dated April 27, 2022 (the “**Order**”), [ECF Dkt. #49](#), pursuant to Fed. R. Civ. P. 65(d)(2).

2. As set forth in the endorsed letter dated June 9, 2022, ECF Dkt. #71, Plaintiffs’ counsel has been in arbitration June 15-16, 2022. As such, Plaintiffs have not had the opportunity to fully address the opposition papers of CloudFlare, dated June 15, 2022 and filed at 11:18 p.m.

3. However, Plaintiffs can readily demonstrate that each of what CloudFlare calls an “Add-On Domain” resolves to the same copyright infringing website, streaming the pirated content

of Plaintiffs.

4. Annexed and made **Exhibit A** hereto is a true and correct copy of Ex. 2 to the Complaint filed on January 3, 2022, ECF Dkt. #8-3, showing the initial infringing Website.

5. Annexed and made **Exhibit B** hereto are true and correct screenshots of website to which the Add-On Domains resolve, which appear to be substantially the same website as set forth in Exhibit A.

6. Annexed and made **Exhibit C** hereto are screenshots from the website MXToolbox/Supertool which indicates that four of the five Add-On Domains are using CloudFlare is the authoritative DNS server. (Israel.bz is presently using DDOS-Guard as its DNS server.)

I declare under penalty of perjury that the foregoing is true to the best of my knowledge.

Dated: New York, New York
June 16, 2022

KAUFMAN & KAHN, LLP

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