



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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July 2, 2021

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 exhibit. 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,



Jan van Voorn

Attachment and Enclosure



EXHIBIT A

Domain	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
cpasfini.com	The Lion King	https://www.cpasfini.com/filmstreaming/animation/2096-le-roi-lion1.html	Wonder Woman 1984	https://www.cpasfini.club/filmstreaming/action/8104-wonder-woman-1984.html
zone-telechargement.cloud	The Lion King	https://www.zone-telechargement.cloud/?p=film&id=12823-le-roi-lion	Wonder Woman 1984	https://www.zone-telechargement.video/?p=film&id=22049-wonder-woman-1984
mygully.com	The Lion King	http://mygully.com/showthread.php?t=5792135	Triple Frontier	http://mygully.com/showthread.php?t=5984521
polishsource.cz	Frozen II	https://polishsource.cz/details.php?id=403460	Beautiful Boy	https://polishsource.cz/details.php?id=378708
xcine.me	The Lion King	https://xcine.me/der-konig-der-lowen-12817-stream	Triple Frontier	https://xcine.me/triple-frontier-2019-11726-stream
streamingcommunity.co	The Lion King	https://streamingcommunity.co/titles/816-il-re-leone	Frozen II	https://streamingcommunity.co/titles/715-frozen-ii-il-segreto-di-arendelle
serieskao.tv	The Lion King	https://serieskao.tv/pelicula/el-rey-leon-zz/	Godzilla vs Kong	https://serieskao.tv/pelicula/godzilla-vs-kong/
pelishouse.com	Mortal Kombat	https://pelishouse.com/movies/mortal-kombat-2021/	Godzilla vs Kong	https://pelishouse.com/movies/godzilla-vs-kong-2021/
peliculaspro.net	Mortal Kombat	https://peliculaspro.net/pelicula/mortal-kombat	Godzilla vs Kong	https://peliculaspro.net/pelicula/godzilla-vs-kong
openpelis.net	Mortal Kombat	https://openpelis.net/mortal-kombat-2021	Godzilla vs Kong	https://openpelis.net/godzilla-vs-kong-2021
peliculaswarez.net	Zack Snyder's Justice League	https://peliculaswarez.net/movies/la-liga-de-la-justicia-de-zack-snyder/	Godzilla vs Kong	https://peliculaswarez.net/movies/godzilla-vs-kong/
seriesw.tv	Grey's Anatomy	https://seriesw.tv/tvshows/greys-anatomy/	Arrow	https://seriesw.tv/tvshows/arrow/
paraveronline.live	Frozen II	https://paraveronline.live/capitulo/frozen-2-online-11102021/	Godzilla vs Kong	https://paraveronline.live/capitulo/godzilla-vs-kong-pelicula-online/
dongphym.net	Godzilla vs Kong	https://dongphym.net/movie/godzilla-dai-chien-kong-godzilla-vs-kong-2021_aCqw9w6o.html	Zack Snyder's Justice League	https://dongphym.net/movie/lien-minh-cong-ly-phien-ban-cua-zack-snyder-zack-snyders-justice-league-80b643bd_ONXNrgiw.html
fullphim.net	Godzilla vs Kong	https://www.fullphim.net/phim/godzilla-dai-chien-kong-godzilla-vs-kong-r2	Fast & Furious 9	https://www.fullphim.net/phim/quanhanh-qua-nguy-hiem-9-huyen-thoai-toc-do-fast-furious-9-the-fast-saga

Domain	Sample 1 Infringed Title	Sample 1 Infringing URL	Sample 2 Infringed Title	Sample 2 Infringing URL
phephimz.net	Godzilla vs Kong	https://phephimz.net/phim/godzilla-dai-chien-kong-i0-9833	Wonder Woman 1984	https://phephimz.net/phim/nu-than-chien-binh-1984-i0-9606
123-hd.com	Godzilla vs Kong	https://www.123-hd.com/godzilla-vs-kong	Wonder Woman 1984	https://www.123-hd.com/wonder-woman-1984
i-moviehd.com	Godzilla vs Kong	https://www.i-moviehd.com/godzilla-vs-kong-2021/	Zack Snyder's Justice League	https://www.i-moviehd.com/zack-snyders-justice-league/
motphjm.net	Godzilla vs Kong	https://motphjm.net/phim/godzilla-dai-chien-kong-8839.html	Zack Snyder's Justice League	https://motphjm.net/phim/lien-minh-cong-ly-phien-ban-cua-zack-snyder-i0-8779.html
2embed.ru	A Quiet Place Part II	https://www.2embed.ru/library/movie/520763	The Conjuring: The Devil Made Me Do It	https://www.2embed.ru/library/movie/423108
fmovies.co	Bad Boys for Life	https://fmovies.co/film/bad-boys-for-life-1003683	Good Boys	https://fmovies.co/film/good-boys-29771
123moviesfree.net	Frozen II	https://123moviesfree.net/movie/Frozen-2-100157/watching.html	Tenet	https://123moviesfree.net/movie/tenet-101355/watching.html
tinyzonetv.to	The Conjuring: The Devil Made Me Do It	https://tinyzonetv.to/movie/watch-the-conjuring-the-devil-made-me-do-it-2021-free-70104	A Quiet Place Part II	https://tinyzonetv.to/movie/watch-a-quiet-place-part-ii-2021-free-66697
myflixxer.to	A Quiet Place Part II	https://myflixxer.to/movie/a-quiet-place-part-ii-66697	The Conjuring: The Devil Made Me Do It	https://myflixxer.to/movie/the-conjuring-the-devil-made-me-do-it-70104
bstsrs.one redirects from best-series.me	Black-ish S04E01	https://bstsrs.one/show/black-ish-s04e01/season/4/episode/1	Breaking Bad S01E06	https://bstsrs.one/show/breaking-bad-s01e06/season/1/episode/6