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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 No.: 2:22-mc-00110

**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 Disney Enterprises, Inc., and Warner Bros. Entertainment, Inc. (“ACE
25 Members”), each of which is a member of the Alliance for Creativity and
26 Entertainment (“ACE”). ACE is a global coalition of leading content creators and
27 on-demand entertainment services committed to supporting the legal marketplace
28 for video content and addressing the challenge of online piracy. The ACE

1 Members, whether themselves or through subsidiaries and affiliates, own the
2 copyrights in the below referenced copyrighted works.

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

| Infringed Title | Domain | M3u Portal List | Channel Backend Link |
|---------------------------------------|-------------------|------------------------------------|---|
| Space Jam: A New Legacy | magistv.net | iptv.magisapk.com/get/15uamczaqcho | 23.237.78.11:7283/3v3wn2wc97coorhvj1n3splbaj6q3zh99p4panvwn2wfil5djnysvp2g5lvkol6p/index.m3u8?un=g3g5vj2f663702&tm=1651512213&sn=GafaIhAVqBdvLcmUM0hf0vIctcz |
| Harry Potter and the Sorcerer's Stone | magistv.net | iptv.magisapk.com/get/15uamczaqcho | 23.237.78.11:7283/5r6y4wd2je131wxc82zax12h9294htrrk91c7qbzhu3oke27uofu5a5pxhwtdpyrfm5640rduis47a3annznv35dsr/index.m3u8?un=g3g5vj2f663702&tm=1651261538&sn=1tYPTC1MHon513Bo4WaxYOHsK0x |
| Godzilla vs Kong | 6iptv.com | streamx.link:8080/c/ | streamx.link:8080/movie/aQ8IR6M11p/JszQF4glbi/98209.mkv |
| Frozen II | 6iptv.com | streamx.link:8080/c/ | streamx.link:8080/movie/aQ8IR6M11p/JszQF4glbi/76740.mkv |
| Joker | xtremehd iptv.org | xtremeport.com:25461/ | 207.244.243.105/vauth/s98jZhuEOjMT P5G Bp6IvQviRpR8qSv9iXzHKqMSi pMZ3VWc3loEkACjekvkEi508Anm3 NaW17rNtZ1ATQ5reAsvalmCsYDsnIB g8rrQA0z2ZGi-59Nn9ESX-ZgOlZTW4veSOSPS21q1YyPcEjLm5 Qdrv97kw E1yij4w jw2lfiiiFVejbx-REHXDSP8ilxuhtWFVXe7k4SyK9-XQet1PeYbSpLAv HHq5_7TFRkdI23 R6M3JvZVqNzkB8EsaOawycUywPVu tkWW7LskKLtJBIGvxw5HsbM5HUHs rNIKAcnA5 PoYcCoRWHFWwjUfu5 Dq9zVIMjh0zT44KRdwmYg9xTnpSfn gV5a5JmRSOHb3k9UflzAXcdF357zR ui0ta5CTik0m8_q7BK_4CrluN6GHJgc nismssMeUkj2q-e4dO6kSu3zbuhqYNQ7D6IZuao95Vk5 2001_a6NNNRrA7sNmzc1OwB-xd- |

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| Infringed Title | Domain | M3u Portal List | Channel Backend Link |
|-----------------|-------------------|-----------------------|--|
| | | | EkPqoHGFi1SBJHu-K93H7uJx3e2JBcdw9SIKFHYEZE aMwWkhyPPa45HGDDf1oAsxaacmJmELc38EbR0Mpp9BE7F1m9zYvYOuatothBFL5C-MYJymPkeGtQQdkYX1nuaE2FaspKbwK2sHNHZRUZv5Hoqv2zA3f6G |
| Frozen II | xtremehd iptv.org | xtremeport.com:25461/ | 139.177.180.141/29e83eb02b2ec65294b1d323d7c70865/vauth/amiAV6gOZ7My6DZZmopQ-LLCecxJ aTRkzIwqa9rZpRmG02bL5-SRiToAvz1bZM8-ckVAv9yrrL1hC2EO7JjgmemVGPPPd f8khP9MhyEpJi6fWOQvvD0z-oUh2T0mGCeT4SXfHm zcsaSnrEzgm c8ftEOEXyC48x2xNAYSHWfCZG73o dXUE0NHkXxouNtMTID UFFwF3iw 7l8gbOCYE9A cYd0QxwjGeWgpeum g1GcoBG1A7e8s1NvRGdteY3DEsIHG 7SS8FjHz Dmm8C6MxruLhVQSeiCsy RsXRXwkZfZahlRBoBp70eskKc9mW Ql1lpDgss6XOxdRWFxLAXGEE LD5g 3M4BVZcSb-f8OobfcYIEijg6hmjXDuiXo9dDxyvDz CweeGO oUeUyD37C11M7IsMfvt5v KRmv_mEudiY1nPWctqRcPdrwwNF 4K-7ZPkVFeZWDIDxO4Qp8Spx0uy9wY HZwydNCgrrdhHXh7hJl0hpcVHxvXc Z5Jw92aEc9bdUFHcL PqRt7vu0Dkis Nc1kjK3lhEmqJJzPs5xML6hT4XXw7 kTg3LaJOBPI22ZDLdj5aHs5eAIFgFri 4Y1pSH6piubD5z0R1NR9pVsPJCceo wz3GkYtl7Z-yZEyxLMN-wxh7IRdlstzlBxIh943wiw |

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

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

Executed at Redondo Beach, California, on May 23, 2022.



Jan van Voorn