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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-00111

**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 Warner Bros. Entertainment, Inc. (“ACE Member”), which is a member of
25 the Alliance for Creativity and Entertainment (“ACE”). ACE is a global coalition of
26 leading content creators and on-demand entertainment services committed to
27 supporting the legal marketplace for video content and addressing the challenge of
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1 online piracy. The ACE Member, whether itself or through subsidiaries and
2 affiliates, owns the copyrights in the below referenced copyrighted works.

3 2. The ACE Member (via the Motion Picture Association, Inc.) is
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:

9 Copyrighted Work	Domain	Channel Backend Link
10 Supernatural S09E07	vw- source.co m	feedback.googleusercontent.com/gadgets/proxy?c ontainer=blogger&url=https%3a%2f%2ftve-live- lln.warnermediacd.com%2fhls%2flive%2f20231 68%2ftnteast%2fslate%2f1650385156_video_360 n-30fps-736kbps/video_172.ts
13 Supernatural S09E08	vw- source.co m	feedback.googleusercontent.com/gadgets/proxy?c ontainer=blogger&url=https://tve-live- lln.warnermediacd.com/hls/live/2023168/tnteast/ slate/VIDEO_5_864000.m3u8
15 Supernatural S09E07	futbollibr e.net	feedback.googleusercontent.com/gadgets/proxy?c ontainer=blogger&url=https%3a%2f%2ftve-live- lln.warnermediacd.com%2fhls%2flive%2f20231 68%2ftnteast%2fslate%2f1650385156_video_360 n-30fps-736kbps/video_172.ts
17 Supernatural S09E08	futbollibr e.net	feedback.googleusercontent.com/gadgets/proxy?c ontainer=blogger&url=https://tve-live- lln.warnermediacd.com/hls/live/2023168/tnteast/ slate/VIDEO_5_864000.m3u8

20 3. The purpose for which this subpoena is sought is to obtain the identities
21 of the individuals assigned to these websites who have exploited ACE Member's
22 exclusive rights in its copyrighted motion pictures without its authorization. This
23 information will only be used for the purposes of protecting the rights granted to
24 ACE Member, the motion picture copyright owner, under Title II of the Digital
25 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