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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-00112

**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 Columbia Pictures Industries, Inc., Disney Enterprises, Inc., Netflix, Inc.,
25 Paramount Pictures Corporation, Sony Pictures Television Inc., Amazon Content
26 Services LLC, Universal City Studios Productions LLLP, Warner Bros.
27 Entertainment, Inc. (“ACE Members”), each of which is a member of the Alliance
28 for Creativity and Entertainment (“ACE”). ACE is a global coalition of leading


1 content creators and on-demand entertainment services committed to supporting the
2 legal marketplace for video content and addressing the challenge of online piracy.
3 The ACE Members, whether themselves or through subsidiaries and affiliates, own
4 the copyrights in the copyrighted works listed in **Exhibit A.**

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

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

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

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

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Jan van Voorn