

1 TIANA S. BAHERI (State Bar No. 330835)  
Tia.Baheri@mto.com  
2 MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue  
3 Fiftieth Floor  
Los Angeles, California 90071-3426  
4 Telephone: (213) 683-9100  
Facsimile: (213) 687-3702

5 Attorneys for Motion Picture Association, Inc.  
6  
7  
8

9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
11

12 In Re 17 U.S.C. § 512(h) Subpoena to  
13 CLOUDFLARE, INC.

Case Number: 2:22-mc-00241

**DECLARATION OF JAN VAN  
VOORN IN SUPPORT OF  
ISSUANCE OF SUBPOENA  
PURSUANT TO 17 U.S.C. § 512(h)**

14  
15  
16  
17  
18  
19  
20 I, Jan van Voorn, the undersigned, declare that:

- 21  
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 Paramount Pictures Corp., 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:

No	App Name	Download Site	Infringed Title 1	Channel Backend Link 1	Infringed Title 2	Channel Backend Link 2
1	HDO Box v2.0.8 build 30	hdo.app/download	Bumblebee	kelk.mcloud.to/1aa38422f8084f42a6d16510ceb9aa408d6ef6164abab3b1554072efed64c7c07c43d210103e63b3aa76d45da94aec8dff89c216807cd2fed3e5f16a1025af83648a40fc161ab1595e91aabf7c44222253268f2f101f3296d99abc008cf941cc327ceb140169bd12bb/r/list.m3u8	Mortal Kombat	v807.streamhub.to/hls/sc6t74dvxqytuzvov6s55zuz5djdmpz5jbbv3rbpkmdpkiezpsrnhy4zqlq/seg-475-v1-a1.ts

25 3. The purpose for which this subpoena is sought is to obtain the identities  
 26 of the individuals assigned to these websites who have exploited ACE Members'  
 27 exclusive rights in their copyrighted motion pictures without their authorization.  
 28

1 This information will only be used for the purposes of protecting the rights granted  
2 to ACE Members, the motion picture copyright owners, under Title II of the Digital  
3 Millennium Copyright Act.

4

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

8 Executed at Redondo Beach, California, on December 9, 2022.

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28



---

Jan van Voorn