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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 Number: 2:22-mc-00243

**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
25 Worldwide Entertainment, LLC, Paramount Pictures Corp., Universal City Studios
26 Productions LLLP, Warner Bros. Entertainment, Inc., Warner Bros. Entertainment
27 Inc.; Village Roadshow Films North America Inc., and Warner Bros. Entertainment
28 Inc.; Village Roadshow Films North America Inc.; BRON Creative USA Corp.

1 (“ACE Members”), each of which is a member of the Alliance for Creativity and
2 Entertainment (“ACE”). ACE is a global coalition of leading content creators and
3 on-demand entertainment services committed to supporting the legal marketplace
4 for video content and addressing the challenge of online piracy. The ACE
5 Members, whether themselves or through subsidiaries and affiliates, own the
6 copyrights in the below referenced copyrighted works.

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

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

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

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

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Jan van Voorn