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 Attorneys for Petitioner  
 4 MVL Film Finance LLC

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 8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

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 11 IN RE: DMCA SECTION 512(h)  
 SUBPOENA TO GOOGLE LLC

Miscellaneous Action No.:

**DECLARATION OF MATTHEW  
 SLATOFF IN SUPPORT OF  
 ISSUANCE OF SUBPOENA  
 PURSUANT TO 17 U.S.C. § 512(h)**

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 19 I, Matthew Slatoff, the undersigned, declare that:

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 21 1. I am the Vice President, Global Security & Content Protection at  
 22 Marvel Studios, LLC, which is an affiliate of (with the same parent as) MVL Film  
 23 Finance LLC (“MVL”). As part of my duties, I am responsible for monitoring and  
 24 addressing infringement of copyright rights owned by MVL and its affiliated  
 25 companies.

26 2. I am authorized to act on MVL’s behalf. I submit this declaration in  
 27 support of MVL’s request for issuance to Google LLC (“Google”) of a subpoena,  
 28 pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h)

1 (the “DMCA Subpoena”), to identify an alleged infringer (or infringers) who posted  
2 content which infringes copyright rights held by MVL in *Ant-Man and the Wasp:*  
3 *Quantumania* (the “Infringing Content”) on systems operated by Google, without  
4 MVL’s authorization. I have personal knowledge of the facts contained herein and,  
5 if called upon to do so, I could and would testify competently thereto.

6 3. On January 21, 2023, Nilo Siqueira, Analyst, Digital Media Antipiracy  
7 at The Walt Disney Company (the parent of MVL), submitted on behalf of MVL a  
8 notification, via a webform provided by Google (at  
9 [https://reportcontent.google.com/forms/dmca\\_drive?hl=en-](https://reportcontent.google.com/forms/dmca_drive?hl=en-GB&utm_source=wmx&utm_medium=deprecation-pane&utm_content=legal-removal-request)  
10 [GB&utm\\_source=wmx&utm\\_medium=deprecation-pane&utm\\_content=legal-](https://reportcontent.google.com/forms/dmca_drive?hl=en-GB&utm_source=wmx&utm_medium=deprecation-pane&utm_content=legal-removal-request)  
11 [removal-request](https://reportcontent.google.com/forms/dmca_drive?hl=en-GB&utm_source=wmx&utm_medium=deprecation-pane&utm_content=legal-removal-request)), identifying the Infringing Content on Google’s systems and  
12 providing the information required by 17 U.S.C. § 512(c)(3)(A). The information  
13 provided to Google via webform was as follows:

- 14 • First Name: Nilo
- 15 • Surname: Siqueira
- 16 • Company Name: The Walt Disney Company
- 17 • Copyright holder that you represent: The Walt Disney Company
- 18 • Email address: Nilo.siqueira@disney.com
- 19 • Choose your country/region: United Kingdom
- 20 • Is the submission related to an unauthorised stream of an upcoming  
21 live event? No
- 22 • Identify and describe the copyrighted work: Unreleased leaked  
23 script of the new Disney movie *Ant-man and the Wasp:*  
24 *Quantumania*
- 25 • Where can we see an authorised example of the work?:  
26 <https://www.imdb.com/title/tt10954600/>

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- Location of infringing material:  
<https://docs.google.com/document/d/1Y7adPnjTvgQFVEO6bgnbSDkDGVcfiONrfQJ9gzDMzPw/>
- I have a good-faith belief that use of the copyrighted materials described above as allegedly infringing is not authorised by the copyright owner, its agent or the law. [Confirmed via box check]
- The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorised to act on behalf of the owner of an exclusive right that is allegedly infringed. [Confirmed via box check]
- I understand that a copy of each legal notice may be sent to the Lumen project (<http://lumendatabase.org>) for publication and annotation. I also understand that Lumen redacts personal contact information from notices before publication but, in many cases, will not redact my name. [Confirmed via box check]
- Signed on the date of: 21 Jan 2023
- By: Nilo Siqueira


4. Mr. Siqueira received a confirmation of receipt of this submission from the address [removals@google.com](mailto:removals@google.com) on January 23, 2023. Attached hereto as Exhibit 1 is a true and correct copy of the confirmation receipt received from Google. Mr. Siqueira was authorized to act on behalf of MVL in submitting this notification.

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5. The purpose for which the DMCA Subpoena is sought is to obtain the identity of an alleged infringer (or infringers) and such information will only be used for the purpose of protecting MVL's rights under title 17 U.S.C. §§ 100, *et seq.*

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 Burbank, California, on March 7, 2023.


  
Matthew Slatoff


# **Exhibit 1**

Your Request to Google [6-5654000033426]

Import Delete Archive Move Flag Read/Unread Pin ...

Your Request to Google [6-5654000033426] ← ↶ ↷

 removals@google.com <removals@google.com> Monday, January 23, 2023 at 8:54 AM

To:  Siqueira, Nilo

**This Message is From an External Sender**  
Caution: Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Thanks for reaching out to us.

Upon recent review of the following URLs, we were unable to locate the content in question:

<https://docs.google.com/document/d/1Y7adPnjTvgQFVEO6bgnbSDkDGVcfiONrfQJ9gzDMzPw/edit>

If this matter is still a concern, please reply to this email with detailed information to enable us to locate the content and we will further investigate your request.

Regards,

The Google Team

For more information about our content removal process access [g.co/legal](https://g.co/legal).

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