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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10

11 IN RE: DMCA SECTION 512(h)
SUBPOENA TO REDDIT, INC.

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

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 Reddit, Inc. (“Reddit”) of a subpoena,
28 pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h)

Case No.

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 Reddit 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 Reddit at [https://reddit.zendesk.com/hc/en-](https://reddit.zendesk.com/hc/en-us/requests/new?ticket_form_id=73465)
9 [us/requests/new?ticket_form_id=73465](https://reddit.zendesk.com/hc/en-us/requests/new?ticket_form_id=73465), identifying the Infringing Content on
10 Reddit’s systems and providing the information required by 17 U.S.C. §
11 512(c)(3)(A). Attached hereto as Exhibit 1 is a confirmation email from Reddit
12 (support@reddit.zendesk.com) which sets forth the information submitted to Reddit.
13 Mr. Siqueira received confirmations from Reddit on January 21, 2023 that Reddit
14 had received the takedown notice. Attached hereto as Exhibit 2 is a true and correct
15 copy of the confirmation of receipt received from Reddit. Mr. Siqueira was
16 authorized to act on behalf of MVL in submitting this notification.

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

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

23 Executed at Burbank, California, on March 7, 2023.

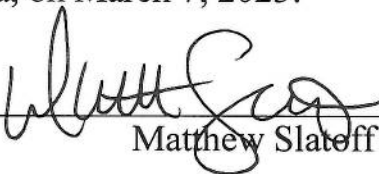
24
25 
26 Matthew Slatoff

Exhibit 1

re: Ant-Man and the Wasp: Quantumania leak

Import Delete Archive Move Flag Read/Unread Pin Sync

re: Ant-Man and the Wasp: Quantumania leak

Reddit Support <support@reddit.zendesk.com>
To: Siqueira, Nilo

Saturday, January 21, 2023 at 8:24 AM

##- Please type your reply above this line -##

Thanks for your request. We will review it and follow up with you soon. Note that Reddit receives a large amount of requests, so please allow some time for a response from us and do not submit duplicate requests in the meantime. Doing so may delay the processing of your claim.

For your reference, here is the information you provided in your request:

What do you need assistance with?
Copyright Infringement / DMCA

Your email address (required)
nilosiqueira@disney.com

Subject of inquiry (required)
Ant-Man and the Wasp: Quantumania leak

Details of inquiry (required)

Copyright owner's full name (required)
The Walt Disney Company

Requester's full name (if different from the copyright owner)
Nilo Siqueira

Street address (required)
3 Queen Caroline St, London W6 9PE

City (required)
London

State/Province (required)
London

Postal code (required)
W69PE

Reddit URL where the allegedly infringing content appears (required)
https://www.reddit.com/r/MarvelStudiosSpoilers/comments/10hj44a/tftmq_antman_and_the_wasp_quantumania_detailed/

Where does the allegedly infringing content appear on Reddit? (required)
In a Reddit post

If you selected "Other" in the previous question, please provide additional information about where the infringing content appears on Reddit (optional)

Describe your copyrighted work that you believe is infringed by this Reddit content (required)
Other - please provide additional information below

Check this box if your copyrighted work is a live broadcast of a sports event (optional)
NOTE: Abuse of this checkbox may result in a delay to the processing of your claim.

Additional information about your copyrighted work (optional)
Unreleased leaked script of the new Disney movie Ant-Man and the Wasp: Quantumania.

What is the title of your copyrighted work? (required)
Ant-Man and the Wasp: Quantumania

Required Statement: I state that I have a good faith belief that use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law.
Yes

Required Statement: I state that the information in the notification is accurate, and under penalty of perjury, that I am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.
Yes

Requester's electronic signature (required)
Nilo Siqueira

Regards,
Reddit Legal Support

This email is a service from Reddit Support.

Exhibit 2

[Reddit Support] Re: Your request sent to Reddit Support

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


[Reddit Support] Re: Your request sent to Reddit Support

Reddit Legal (Reddit Support) <support@reddit.zendesk.com> To: Siqueira, Nilo Saturday, January 21, 2023 at 1:16 PM

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.

##- Please type your reply above this line -##

Your request (8874753) has been updated. To add additional comments, reply to this email.

 **Reddit Legal (Reddit Support)**
Jan 21, 2023, 13:16 PST

Hello,

Thanks for your message.

Regarding the following content:
https://www.reddit.com/r/MarvelStudiosSpoilers/comments/10hj44a/tftmq_antman_and_the_wasp_quantumania_detailed

After review of the allegedly infringing content and your description of your copyrighted work, we have queued the content for removal from Reddit. Please allow some time for the removal to take effect.

Kind regards,
Reddit Legal

This email is a service from Reddit Support.