

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

In Re 17 U.S.C. § 512(h) Subpoena to

CLOUDFLARE, INC.

Case Number: 2:20-mc-00053

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

I, Jan van Voorn, the undersigned, declare that:

1. I am Executive Vice President and Chief of Global Content Protection for the Motion Picture Association, Inc., on behalf of Paramount Pictures Corporation, Sony Pictures Entertainment Inc., Universal City Studios LLC, Walt Disney Studios Motion Pictures, Warner Bros. Entertainment Inc., Amazon Content Services LLC and Netflix Studios, LLC (“ACE Members”) who are members of the Alliance for Creativity and Entertainment (“ACE”), a global coalition of leading content creators and on-demand entertainment services committed to supporting the legal marketplace for video content and addressing the challenge of online piracy. The ACE Members own the copyrights in the below referenced motion pictures.

2. The ACE Members are requesting issuance of the attached proposed subpoena that would order Cloudflare, Inc. to disclose the identities, including names, physical addresses, IP addresses, telephone numbers, e-mail addresses, payment information, account updates and account histories of the users operating the following website, which is infringing the below-identified ACE Members’ copyrighted motion pictures at the below-identified URLs:

Website	Sample Infringing URL	Infringed Work	Copyright Holder
nites.is	https://nites.is/movies/bad-boys-for-life	Bad Boys for Life (2020)	Columbia Pictures Industries, Inc.
nites.is	https://nites.is/movies/cars-3	Cars 3 (2017)	Disney Enterprises, Inc. and Pixar
nites.is	https://nites.is/movies/bloodshot	Bloodshot (2020)	Columbia Pictures Industries, Inc.
nites.is	https://nites.is/movies/bird-box	Bird Box (2018)	Netflix Studios LLC
nites.is	https://nites.is/movies/yesterday	Yesterday (2019)	Universal City Studios Productions LLLP and Perfect Universe Investment Inc.
nites.is	https://nites.is/movies/a-quiet-place	A Quiet Place (2018)	Paramount Pictures Corp.

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

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 Sherman Oaks, California, on May 12, 2020.



 Jan van Voorn