

**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-00086

**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 Columbia Pictures Industries, Inc., Disney Enterprises, Inc., Universal City Studios Productions LLLP, and Warner Bros. Entertainment, Inc. (“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, whether themselves or through subsidiaries and affiliates, own the copyrights in the below referenced copyrighted works.

2. The ACE Members (via the Motion Picture Association, Inc.) 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 huhu.to website and service. Huhu.to utilizes Cloudflare servers to facilitate access to infringing


content by connecting users of the “Watched” mobile application to cyberlockers containing infringing content. For example, huhu.to has facilitated access to infringing content located on the following websites:

Infringed Title	Huhu.to Link	Cyberlocker Link
Bloodshot	https://huhu.to/french--stream/source.watched	https://gounlimited.to/embed-2adn6f1pmr7u.html https://embed.mystream.to/ktaz7lp4616h
It Chapter Two	https://huhu.to/hot-movies-de-2/source.watched	https://vup.to/embed-rqpqyxpfuov.html https://cloudvideo.tv/embed-anyhbhr3lyjd.html
The Hunt	https://huhu.to/kinox/source.watched	https://clipwatching.com/j2vnfxsgd157/prd-the.hunt-sd-bluray.mkv.html https://gounlimited.to/embed-sy1m6s9hwpcy.html https://gounlimited.to/embed-muc2ilse92b7.html http://mystream.to/watch/r1ilh fj8a764 https://mystream.to/watch/221414ojp5lo https://jetload.net/e/qZ2mrWM5xsDm https://jetload.net/e/HXNOTw8B80dM
Beauty and the Beast	https://huhu.to/kinox/source.watched	https://gounlimited.to/embed-z3bsunadf3mi.html https://jetload.net/#!/v/CLRmKIF6Y72R http://upstream.to/mww2n13w5fm7

3. The purpose for which this subpoena is sought is to obtain the identities of the individuals assigned to huhu.to who have exploited ACE Members’ exclusive rights in their copyrighted works without their authorization. This information will only be used for the purposes of protecting the rights granted under Title 17, United States Code.

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 Redondo Beach, California, on September 4, 2020.



Jan van Voorn