

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

ENTERTAINMENT SOFTWARE ASSOC.,	)	
	)	Case:
Movant,	)	
	)	DECLARATION OF M. CAITLIN
v.	)	SHAWLEY IN SUPPORT OF
	)	ISSUANCE OF SUBPOENA
CLOUDFLARE, INC.,	)	PURSUANT TO 17 U.S.C. §512(h)
	)	
Non-movant.	)	

I, M. CAITLIN SHAWLEY, the undersign, declare that:

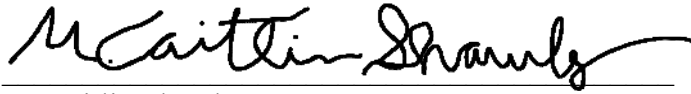
1. I am Counsel, IP Protection and Security for the Entertainment Software Association (“ESA”).
2. ESA is a U.S. trade association that represents the interests of the leading publishers of interactive games for video game consoles, personal computers, handheld devices, and the Internet (“ESA Member Companies”). ESA Member Companies own the intellectual property, including copyright, patent, and trademark rights, associated with their entertainment software products. ESA is authorized to represent ESA Member Companies in enforcement actions against third parties that infringe or contribute to the infringement of ESA Member Companies’ intellectual property rights.
3. ESA is requesting enforcement 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 websites:

Rutracker.org

4. The unauthorized materials posted to the websites are covered and protected by ESA Member Companies’ copyrights. Non-limiting examples of the unauthorized materials posted on the Rutracker.org website include: Ace Combat 7: Skies Unknown, Assassin's Creed Mirage, Call of Duty Black Ops 6, Final Fantasy VII Remake Intergrade, Ghost of Tsushima Director's Cut, Grand Theft Auto V, Hogwarts Legacy, Metal Gear Solid Delta: Snake Eater, Pokémon Legends Z-A, Resident Evil 4.
5. This subpoena is sought to obtain the identities of the individuals assigned to the websites that have, without authorization, reproduced and offered for distribution, copyrighted materials owned by ESA Member Companies. This information sought will only be used for the purpose of protecting the rights granted to ESA Member Companies 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 Washington D.C., on December 16, 2025.

A handwritten signature in black ink, reading "M. Caitlin Shawley", written over a horizontal line.

M. Caitlin Shawley