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9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11 WESTERN DIVISION
12

13 PARAMOUNT PICTURES
CORPORATION; UNIVERSAL CITY
14 STUDIOS PRODUCTIONS LLLP;
UNIVERSAL CONTENT
15 PRODUCTIONS LLC; UNIVERSAL
TELEVISION LLC; WARNER BROS.
16 ENTERTAINMENT INC.,
COLUMBIA PICTURES
17 INDUSTRIES, INC.; DISNEY
ENTERPRISES, INC.; NETFLIX
18 STUDIOS, LLC; NETFLIX US, LLC;
and NETFLIX WORLDWIDE
19 ENTERTAINMENT, LLC,

20 Plaintiffs,

21 vs.

22 DOES 1-10 d/b/a PRIMEWIRE,
23 Defendants.
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Case No. 2:21-cv-09317-MCS-SK

**DECLARATION OF JAN VAN
VOORN IN SUPPORT OF
PLAINTIFFS' MOTION [1] TO
MODIFY PERMANENT
INJUNCTION AND [2] FOR MORE
TIME TO CONDUCT DAMAGES
DISCOVERY; MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT THEREOF**

Judge: Hon. Mark C. Scarsi
Date: Monday, August 22, 2022
Time: 9:00 a.m.
Courtroom: 7C

Filed concurrently with
(1) Notice of Motion and Motion to
Modify Injunction and for More Time
to Conduct Damages Discovery;
(2) Declaration of Shannon Aminirad;
(3) [Proposed] Amended Injunction;
and
(4) [Proposed] Order Extending Time

DECLARATION OF JAN VAN VOORN

I, Jan van Voorn, declare as follows:

1. I am Executive Vice President and Chief, Global Content Protection (“GCP”) Enforcement and Operations, at the Motion Picture Association, Inc. (“MPA”), where I have worked since 2013. I previously submitted declarations, dated December 3, 2021, February 17, 2022, and March 11, 2022.¹ This declaration provides additional information regarding GCP’s discovery of a new website that appears to be operated by the same individuals behind www.primewire.li, www.primewire.vc, www.primewire.ag, and www.primewire.tf (the “PrimeWire Websites”). Except as otherwise noted, the contents of this declaration are based on facts within my personal knowledge or facts provided to me by members of the GCP team working at my direction. If called as a witness in this action, I could and would testify competently to the contents of this declaration.

2. On or about May 31, 2022 or June 1, 2022, my team discovered a new website called HydraWire, accessible at www.hydrawire.tv.

3. At first glance, it was apparent that HydraWire had connections to PrimeWire. My team undertook an investigative to confirm that fact and attempt to determine the individuals or entities behind HydraWire. I am confident, based on my numerous investigations of pirate streaming sites, that, while both sites have shielded information regarding the identities of the operators, the same individuals and/or entities are behind both HydraWire and PrimeWire.

4. My team investigated WHOIS records, which are required to disclose information regarding every registered domain. Those records indicate that the website launched on April 21, 2022—one day after this Court issued the Injunction. Using the “wayback machine,” it appears that as of April 2022, the site looked

¹ I understand that my February 17 declaration was filed February 18, 2022, and my March 11 declaration was filed March 12, 2022.

1 substantially similar to its current form. Attached hereto as **Exhibit 1** is a true and
2 correct screen capture of a “wayback machine” capture of the site as of April 24,
3 2022.

4 5. The WHOIS information shows that all contact and other identifying
5 information is marked as private and hidden through proxy services, like Cloudflare.
6 Based on my team’s investigation of the WHOIS registration information,
7 HydraWire is hosted by FlokiNet. The domain name registrar is Sarek Oy, which is
8 the same for www.primewire.li, www.primewire.vc, and www.primewire.tf.
9 PrimeWire and HydraWire also have similar IP addresses: 185.100.87.138 for
10 HydraWire and 185.100.87.87 for PrimeWire.tf, suggesting they are located on the
11 same server.² The domain name registry for HydraWire is the Ministry of Finance
12 and Tourism, Tuvalu, administered by Verisign Global Registry Services.

13 6. My team also prepared materials and asked counsel to file a subpoena,
14 pursuant to 17 U.S.C. § 512(h) directed to Cloudflare for any identifying
15 information it had regarding the individuals or entities behind www.hydrawire.tv.
16 The subpoena response confirmed that HydraWire uses FlokiNet for hosting
17 services and its IP address is 185.100.87.87, but did not provide us with any other
18 information from which we could identify the operators. I am nevertheless
19 confident, based on the information we do have and technical similarities described
20 below, that the same individuals or entities are behind both PrimeWire and
21 HydraWire.

22 7. The organization and appearance of HydraWire is largely identical to
23 the organization and appearance of the PrimeWire Websites, which I have described
24 in my prior declarations. HydraWire has the same general landing page, categories,
25 movie and television show title pages, search functionality, and other features as

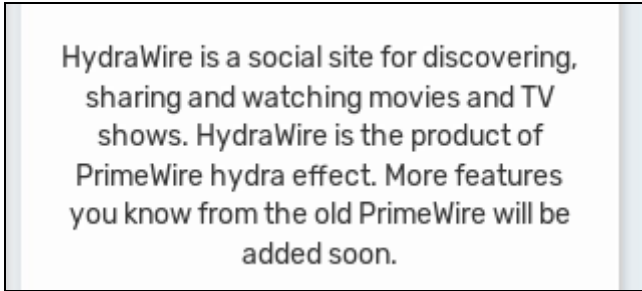
26 ² My team is also investigating another pirate site, streamocean.tv, which shares the
27 IP address and some other technical features, but we do not yet have sufficient
28 information to ask that the site be added to the Court’s Injunction.

1 were located on the other PrimeWire Websites. Attached hereto as **Exhibit 2** and
2 reproduced below is a true and correct copy of the homepage of www.hydrawire.tv,
3 and the FAQ page.

4 8. HydraWire also directly copies text and pages from PrimeWire. For
5 example, the FAQ page on both websites contains the exact same text. *See* Ex. 2.

6 9. In the sidebar of every page, HydraWire contains a notice that
7 “HydraWire is the product of PrimeWire hydra effect. More features you know
8 from the old PrimeWire will be added soon.”

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HydraWire is a social site for discovering,
sharing and watching movies and TV
shows. HydraWire is the product of
PrimeWire hydra effect. More features
you know from the old PrimeWire will be
added soon.

See Exs. 1, 2.

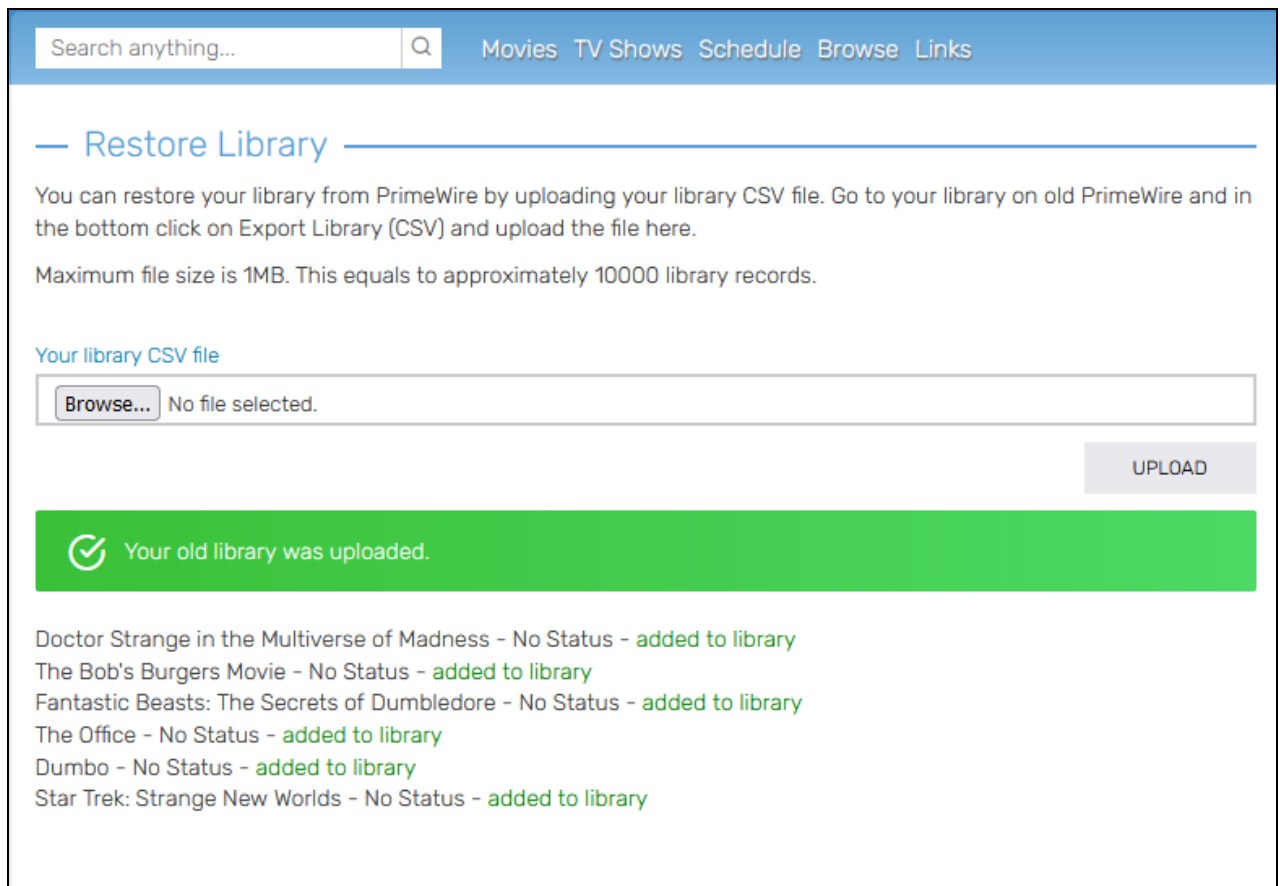
10. I interpret the “hydra effect” as a reference to copyright pirates’
practice of utilizing additional “mirror” websites to get around court orders
restricting access to a particular website. As described in my March 11, 2022
declaration, this behavior is consistent with Defendants’ actions in response to
enforcement proceedings outside the United States, in which they have launched
additional websites in an attempt to enable users to continue using the service to
access unauthorized streams.

11. Other website elements indicate a relationship between the two
websites. The sidebar of HydraWire provides a way for users to “restore” their
PrimeWire library (i.e., the list of titles saved to users’ account to help track their
TV schedule) onto HydraWire.



See Exs. 1, 2.

12. HydraWire instructs PrimeWire users how they can download the contents of their PrimeWire library into a .CSV file and then provides a mechanism to upload their PrimeWire library onto HydraWire, presumably to help users track their TV schedule and other features. Attached hereto as **Exhibit 3** is a screenshot illustrating this process on HydraWire.



13. Based on my team's research using SimilarWeb, the top referring website to HydraWire is www.primewire.tf.

14. Like the PrimeWire Websites, HydraWire provides users access to

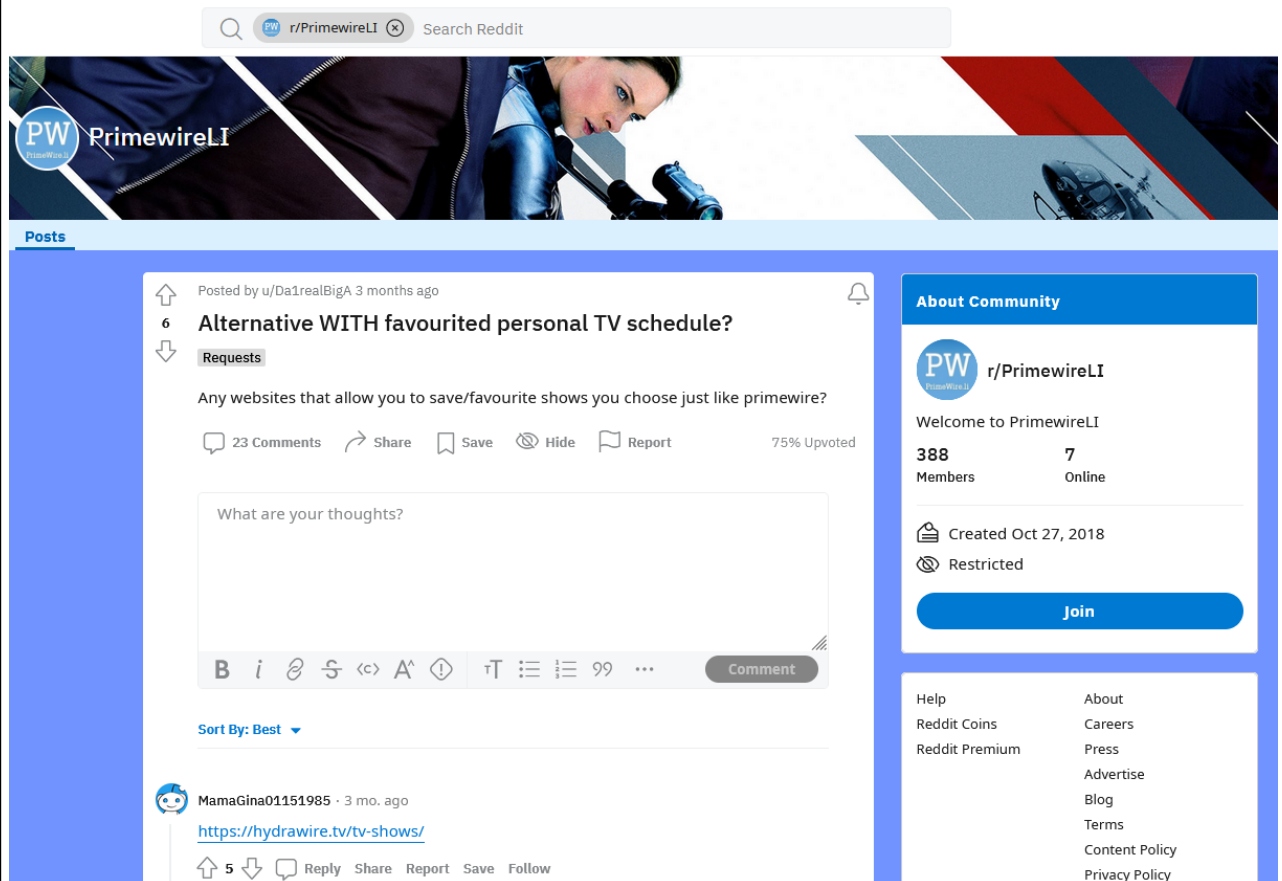
1 streams of movies and television shows through embedded streaming on those sites
2 or through third-party sites to which HydraWire's operators provide links. The
3 streams of this content provide users with unauthorized access to on-demand
4 viewing of an enormous quantity of movies and television shows, including works
5 whose copyrights I understand are owned or controlled by Plaintiffs ("Copyrighted
6 Works"). Members of my team have been able to stream multiple Copyrighted
7 Works through HydraWire, just as representative examples. Attached hereto as
8 **Exhibit 4** are screen captures showing streams of Disney's *Frozen II* (2019) and
9 Columbia Picture's *Spider-Man: Far from Home* (2019) as well as Universal's new
10 release *Minions: The Rise of Gru* (2022) through www.hydrawire.tv.

11 15. Beyond just the titles that we streamed and specifically captured, a
12 review of the HydraWire site makes clear that it offers hundreds, potentially in the
13 thousands, of Plaintiffs' Copyrighted Works. This includes new releases that are
14 still in theaters or not even released yet in the United States. For example,
15 HydraWire offered links to streams from camcorder recordings of Universal's
16 *Jurassic World: Dominion* (2022) at a time *before* it was released to theaters in the
17 United States on June 10, 2022. Attached hereto as **Exhibit 5** is a true and correct
18 screen capture of the HydraWire page for that title, which was captured June 4,
19 2022.

20 16. There is significant overlap between the links on HydraWire and the
21 links on the old version of the PrimeWire Websites. Twelve out of sixteen of
22 HydraWire's cyberlocker sources overlap with the cyberlockers previously used on
23 the PrimeWire Websites.

24 17. Social media posts also indicate a relationship between the two sites.
25 GCP investigators have been closely monitoring /r/PrimeWireLI, the subreddit
26 associated with the PrimeWire Websites. For months after the lawsuit was filed, the
27 PrimeWire subreddit went private. Moderators of the subreddit also closely monitor
28 the site and regularly delete posts. Around the time that HydraWire launched,

1 however, the subreddit once again became public. The subreddit moderators have
 2 also left up a post promoting HydraWire as an alternative to the PrimeWire
 3 Websites, even while continuing to delete other posts regarding competing
 4 infringing services. Attached hereto as **Exhibit 6** is a true and correct screenshot of
 5 this Reddit post.



18. GCP investigators have observed that occasionally HydraWire goes
 down. As of the first week of July 2022 and again July 19, 2022, GCP investigators
 documented links to infringing streams of Plaintiffs' Copyrighted Works.

19. In addition to discovering HydraWire, GCP investigators have
 continued to monitor the PrimeWire Websites. While www.primewire.tf continues
 to block certain links, we have nevertheless identified Plaintiffs' Copyrighted Works
 available for streaming. Attached hereto as **Exhibit 7** are screen captures showing
 streams of the identified Copyrighted Work through www.primewire.tf. Notably,

1 Defendants continue to respond to Plaintiffs' enforcement efforts, including by
2 removing links to *The Lion King* (1994) and *Back to the Future* after Plaintiffs filed
3 subpoenas seeking identifying information pursuant to 17 U.S.C. § 512(h) that
4 identified those titles.

5 20. On or about June 14, 2022, GCP investigators discovered that the
6 domain primewire.vc has been suspended.

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9 I declare under penalty of perjury under the laws of the United States that the
10 foregoing is true and correct.

11 Executed on July 19, 2022 at Redondo Beach, California.

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Jan van Voorn