

1 OLIVER BROWN (State Bar No. 335952)

Oliver.Brown@mto.com

2 MUNGER, TOLLES & OLSON LLP

350 South Grand Avenue

3 Fiftieth Floor

Los Angeles, California 90071-3426

4 Telephone: (213) 683-9100

Facsimile: (213) 687-3702

5 Attorneys for Motion Picture Association, Inc.

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9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

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12 In Re 17 U.S.C. § 512(h) Subpoena to

13 CLOUDFLARE, INC.

Case Number: 2:24-mc-00162

**DECLARATION OF LARISSA
KNAPP IN SUPPORT OF
ISSUANCE OF SUBPOENA
PURSUANT TO 17 U.S.C. § 512(h)**

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20 I, Larissa Knapp, the undersigned, declare that:

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22 1. I am Executive Vice President and Global Chief Content Protection for
23 the Motion Picture Association, Inc. (“MPA”). I submit this declaration on behalf
24 of Amazon Studios LLC, Netflix Studios, LLC, Paramount Pictures Corporation,
25 Sony Pictures Entertainment Inc., Universal City Studios LLC, Walt Disney Studios
26 Motion Pictures, and Warner Bros. Entertainment Inc. (“ACE Members”), each of
27 which is a member of the Alliance for Creativity and Entertainment (“ACE”). ACE
28 is a global coalition of leading content creators and on-demand entertainment

1 services committed to supporting the legal marketplace for video content and
 2 addressing the challenge of online piracy. The ACE Members, whether themselves
 3 or through subsidiaries and affiliates, own the copyrights in the below referenced
 4 copyrighted works.

5 2. The ACE Members (via the Motion Picture Association, Inc.) are
 6 requesting issuance of the attached proposed subpoena that would order Cloudflare,
 7 Inc. to disclose the identities, including names, physical addresses, IP addresses,
 8 telephone numbers, e-mail addresses, payment information, account updates and
 9 account histories of the users operating the following websites:

No	Infringing Website	Infringed Title 1	Infringed Title 2
1	tv70.icu	Fast and Furious Presents: Hobbs and Shaw	Top Gun: Maverick
2	fortv.cc	Fast and Furious Presents: Hobbs and Shaw	Top Gun: Maverick
3	tvtap-apk.com/apk1/	Shazam! Fury of the Gods	Manchurian Candidate
4	tvtap-pro.net/dl/v3.2.apk/	Shazam! Fury of the Gods	Manchurian Candidate
5	hdoxbox.tv	Oppenheimer	Inside Out
6	cdn.hdoxstatic.com/setup/hdo/1719221184/hdo-android.apk	Oppenheimer	Inside Out

No	Infringing Website	Infringed Title 1	Infringed Title 2
7	hdo.app/download	Oppenheimer	Inside Out
8	cinemahdv3.com	Don't Worry Darling	Gran Turismo
9	onstream.so	Don't Worry Darling	Gran Turismo
10	dl2.getmenow.click/setup/onstream/5780393/onstream-android.apk	Don't Worry Darling	Gran Turismo
11	castledownload.com	Transformers One	Barbie

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.

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

4 Executed at Washington D.C., on December 23, 2024.

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6 *Larissa Knapp*

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Larissa Knapp
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