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July 28, 2025

Case: 1:25-mc-00125
Assigned To : Unassigned
Assign. Date : 7/30/2025
Description: MISC.

Via Email

Cloudflare, Inc.
Attn: Legal Department
101 Townsend St.
San Francisco, CA 94107
abuseddocuments@cloudflare.com
abuse+law@cloudflare.com

Re: Notice of Copyright Infringement & DMCA Violations

Dear Sir or Madam:

I write to you on behalf of copyright owners American Chemical Society, Elsevier Inc., Springer Nature, and Taylor & Francis Group LLC (and their affiliated entities identified in **Exhibit 1**) (collectively, "Publishers"), concerning an urgent matter of copyright infringement in connection with Cloudflare's services that requires your immediate attention.

Publishers are leading scientific publishers that own and control copyrights in a range of valuable textbooks, journal articles, and other scientific materials. We have identified unauthorized Publisher content being hosted and distributed in connection with Cloudflare's services. This reproduction and distribution is unauthorized, it is plainly illegal, and it causes severe and continuing harm to Publishers.

Publishers urge you to immediately and permanently block all content that infringes on Publishers' copyrights, including in particular the Publisher content identified herein. Publishers also request that you take appropriate action to ensure that your services do not encourage, support, or profit from the unlawful distribution of Publisher content or other infringing files by reasonably implementing your policies regarding copyright infringement and repeat infringers. Attached as **Exhibit 1** is a non-exhaustive list of copyrighted works being infringed and URLs that contain unauthorized Publisher content that we recently identified in connection with your platform. We emphasize that this is a representative list.

I state that I have a good faith belief that the use of the works identified above is not authorized by the copyright owners, their agents, or the law, and that the information in this notice is accurate. I swear, under penalty of perjury, that I am authorized to act on behalf of Publishers who are the rights owners whose exclusive rights are allegedly infringed.

RECEIVED

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Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

We hereby give notice of these activities and demand that you take expeditious action to disable access to the material described above, thereby preventing the illegal reproduction and distribution of this content via your company's services.

This notice is not a complete statement of Publishers' rights in connection with this matter, and nothing herein shall be construed as any limitation or waiver as to any of Publishers' rights, claims and/or remedies that may be applicable, each of which is expressly reserved.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "N. C. Hailey", is written above the printed name.

Nicholas C. Hailey