

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**IN RE: DMCA SUBPOENA
To Cloudflare, Inc.**

)
)

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

DECLARATION OF NICHOLAS C. HAILEY

I, Nicholas C. Hailey, declare and testify as follows:

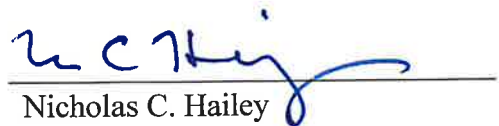
1. I am a partner at the law firm Oppenheim + Zbrak, LLP and am admitted to practice law in the District of Columbia, among other jurisdictions. Our firm represents the following publishers in connection with this matter: the American Chemical Society, Elsevier Inc., Springer Nature, and Taylor & Francis Group LLC (the "Publishers").

2. On behalf of the Publishers, I am seeking a subpoena pursuant to 17 U.S.C. § 512(h) to identify the person(s) infringing the Publishers' copyrighted works, as identified in the 512(c)(3)(A) notification accompanying this declaration.

3. The purpose for which the subpoena is sought is to obtain the identity of alleged infringer(s), and the information obtained therefrom will only be used for the purpose of protecting rights under the U.S. Copyright Act.

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

Executed on July 28, 2025, in Washington, D.C.


Nicholas C. Hailey

RECEIVED

JUL 30

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