

1 ROSE L. EHLER (SB# 296523)
rose.ehler@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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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12 In Re 17 U.S.C. § 512(h) Subpoena to
13 CLOUDFLARE, INC.

Case Number: 2:25-mc-107

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

I, Larissa Knapp, the undersigned, declare that:

1. I am Executive Vice President and Global Chief Content Protection for the Motion Picture Association, Inc. (“MPA”). I submit this declaration on behalf of Columbia Pictures Industries, Inc., Disney Enterprises, Inc., Netflix Worldwide Entertainment, LLC, Paramount Pictures Corporation, Universal City Studios Productions LLLP, Viacom International Inc., and Warner Bros. Entertainment, Inc., (“ACE Members”), each of which is a member of the Alliance for Creativity and Entertainment (“ACE”). ACE is a global coalition of leading content creators and on-demand entertainment services committed to supporting the legal marketplace for video content and addressing the challenge of online piracy. The ACE Members, whether themselves or through subsidiaries and affiliates, own the copyrights in the below referenced copyrighted works.

2. The ACE Members (via the Motion Picture Association, Inc.) are requesting issuance 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:

No	Domain	Infringed Title 1	Infringing URL 1	Infringed Title 2	Infringing URL 2
1	123moviesfree.net	Brave	123moviesfree.net/movie/brave-5065/	Abigail	123moviesfree.net/movie/abigail-1630857009/
2	430hdd.com	Venom: The Last Dance	430hdd.com/movie/venom-the-last-dance/	M3gan	430hdd.com/movie/m3gan/
3	cuevana3cc.me	Moana 2	pelis.cuevana3cc.me/pelicula/moana-2-p8/	Venom: The Last Dance	pelis.cuevana3cc.me/pelicula/venom-3-ee/
4	cinecalidad.rs	Moana 2	cinecalidad.rs/pelicula/moana-2-2024-	Venom: The Last Dance	cinecalidad.rs/pelicula/venom-el-ultimo-baile-

1			online-		2024-online-
2			descarga/		descarga/
3	5	pelispop.lat	Moana 2	pelispop.lat/pel iculas/moana- 2-2024/	Venom: The Last Dance pelispop.lat/peli culas/venom-el- ultimo-baile- 2024/
4					
5	6	peelink2.com	Moana 2	peelink2.com/2 024/11/ver- moana-2-2024- online.html	Venom: The Last Dance peelink2.com/2 024/10/ver- venom-el- ultimo-baile- 2024-online- 2.html
6					
7					
8					
9	7	cuevana.is	Moana 2	cuevana.is/peli cula/1241982/ moana-2	Venom: The Last Dance cuevana.is/pelic ula/912649/ven om-el-ultimo- baile
10					
11					
12	8	cineby.app	Moana 2	cineby.app/mo vie/1241982	Venom: The Last Dance cineby.app/mov ie/912649
13					
14	9	bstsrs.in	Black-ish S04E01	bstsrs.in/globin ?link=aHR0cH M6Ly92aWRz cmMueHl6L2 VtYmVkl3R0 MzQ4NzM1Ni 80LTEv	Fuller House S03E11 bstsrs.in/globin? link=aHR0cHM 6Ly92aWRzcm MueHl6L2VtY mVkl3R0Mzk4 NjU4Ni8zLTEx Lw==
15					
16					
17					
18					
19	10	topsrs.day	Black-ish S04E01	topsrs.day/glob in?link=aHR0c HM6Ly92aWRz cmMueHl6L2 VtYmVkl3R0 MzQ4NzM1Ni 80LTEv	Fuller House S03E11 topsrs.day/globi n?link=aHR0cH M6Ly92aWRzc mMueHl6L2Vt YmVkl3R0Mz k4NjU4Ni8zLT ExLw==
20					
21					
22					
23					
24	11	fmovies.co	The Amazing Spider-Man 2	fmovies.co/fil m/the- amazing- spider-man-2- 1754/	Transform ers: Dark of the Moon fmovies.co/film /transformers- dark-of-the- moon-1706/
25					
26					
27	12	aniwave.se	Romantic Killer S01E01	aniwave.se/ani me-	The Legend of aniwave.se/ani me- watch/avatar-
28					

1			watch/romantic	Korra	the-legend-of-
2			-killer/ep-1	S01E01	korra/ep-1
3	13	comandoplay.com	Moana 2	comandoplay.c	comandoplay.co
4			om/moana-2/	Gladiator	m/gladiator-2/
5	14	piratetv.pro	Barbie	ondemand.pirat	ondemand.pirat
6			etv.pro/movie/	Minions 2:	etv.pro/movie/4
7			346698	The Rise	38148
8				of Gru	
9	15	streamingunit	Frozen II	streamingunity.	streamingunity.
10		y.co		co/en/watch/71	co/en/watch/440
11			5	Bad Boys	
12				for Life	
13	16	baan-	Moana 2	Venom:	baan-
14		series.online		The Last	series.online/ve
15			baan-	Dance	nom-the-last-
16			series.online/m		dance.html
17			oana-2-		
18			2024.html		
19	17	doomovie-	Moana 2	Venom:	doomovie-
20		free.com		The Last	free.com/venom
21			doomovie-	Dance	-the-last-dance-
22			free.com/moan		2024-
23			a-2-2024-		%e0%b9%80%
24			%e0%b9%82%		e0%b8%a7%e0
25			e0%b8%a1%e		%b8%99%e0%
26			0%b8%ad%e0		b9%88%e0%b8
27			%b8%b2%e0%		%ad%e0%b8%
28			b8%99%e0%b		a1-
			9%88%e0%b8		%e0%b8%a1%
			%b2-2/		e0%b8%ab%e0
					%b8%b2%e0%
					b8%a8%e0%b8
					%b6%e0%b8%
					81%e0%b8%ad
					%e0%b8%aa%e
					0%b8%b9%e0
					%b8%a3%e0%
					b8%ad%e0%b8
					%ab/
25	18	theflixertv.to	Shazam!	theflixertv.to/w	theflixertv.to/w
26				atch-	atch-
27				movie/watch-	movie/watch-
28				shazam-full-	raya-and-the-
				13767.5373601	last-dragon-full-
					66700.4791574

1	19	hdtodayz.to	Shazam!	hdtodayz.to/watch-movie/watch-shazam-hd-13767.5373601	Raya and the Last Dragon	hdtodayz.to/watch-movie/watch-ray-a-and-the-last-dragon-hd-66700.4791574
2						
3						
4						
5	20	movies2watch.tv	Shazam!	movies2watch.tv/watch-movie/watch-shazam-hd-13767.1614553	Raya and the Last Dragon	movies2watch.tv/watch-movie/watch-ray-a-and-the-last-dragon-hd-66700.4117621
6						
7						
8						
9	21	dopebox.to	Shazam!	dopebox.to/watch-movie/watch-shazam-online-hd-13767.5373601	Raya and the Last Dragon	dopebox.to/watch-movie/watch-ray-a-and-the-last-dragon-online-hd-66700.4791574
10						
11						
12						
13						
14	22	flihq.to	Shazam!	flihq.to/watch-movie/watch-shazam-13767.5373601	Raya and the Last Dragon	flihq.to/watch-movie/watch-ray-a-and-the-last-dragon-66700.4791574
15						
16						
17	23	himovies.sx	Shazam!	himovies.sx/watch-movie/shazam-13767.5373601	Raya and the Last Dragon	himovies.sx/watch-movie/raya-and-the-last-dragon-66700.4791574
18						
19						
20						
21	24	fmovies.ro	Shazam!	fmovies.ro/watch-movie/watch-shazam-online-13767.5373601	Raya and the Last Dragon	fmovies.ro/watch-movie/watch-ray-a-and-the-last-dragon-online-66700.4791574
22						
23						
24						
25	25	moviesjoy.plu s	Shazam!	moviesjoy.plus/watch-movie/watch-shazam-13767.1614553	Raya and the Last Dragon	moviesjoy.plus/watch-movie/watch-ray-a-and-the-last-dragon-66700.4791574
26						
27						
28						

1	26	nunflix.org	M3gan 2.0	nunflix.org/watch/movie/1071585	Avatar: The Last Airbender S01E01	nunflix.org/watch/tv/246/1/1
2	27	animekai.to	Panda and the Magic Serpent	animekai.to/watch/panda-and-the-magic-serpent-mle7#ep=1	Batman Ninja	animekai.to/watch/batman-ninja-wy5g#ep=1
3	28	animekai.cc	Panda and the Magic Serpent	animekai.cc/watch/panda-and-the-magic-serpent-mle7#ep=1	Batman Ninja	animekai.cc/watch/batman-ninja-wy5g#ep=1
4	29	animekai.ac	Panda and the Magic Serpent	animekai.ac/watch/panda-and-the-magic-serpent-mle7#ep=1	Batman Ninja	animekai.ac/watch/batman-ninja-wy5g#ep=1
5	30	hianimez.is	Food Wars! Shokugeki No Soma S01E01	hianimez.is/watch/food-wars-shokugeki-no-soma-185?ep=4405	Romantic Killer S01E01	hianimez.is/watch/romantic-killer-18197?ep=94887
6	31	hianime.bz	Food Wars! Shokugeki No Soma S01E01	hianime.bz/watch/food-wars-shokugeki-no-soma-185?ep=4405	Romantic Killer S01E01	hianime.bz/watch/romantic-killer-18197?ep=94887
7	32	hianime.pe	Food Wars! Shokugeki No Soma S01E01	hianime.pe/watch/food-wars-shokugeki-no-soma-185?ep=4405	Romantic Killer S01E01	hianime.pe/watch/romantic-killer-18197?ep=94887
8	33	hianime.cx	Food Wars! Shokugeki No Soma S01E01	hianime.cx/watch/food-wars-shokugeki-no-soma-185?ep=4405	Romantic Killer S01E01	hianime.cx/watch/romantic-killer-18197?ep=94887

1	34	animedefenders.me	Mob Psycho 100 S01E01	animedefenders.me/watch/32182/a1/k1/	Food Wars! (Shokugeki No Souma) S01E01	animedefenders.me/watch/28171/a1/k1/
2	35	portalultautv.biz	Smurfs	portalultautv.biz/strumfi-filmul-smurfs-2025/	Venom: The Last Dance	portalultautv.biz/venom-ultimul-dans-venom-the-last-dance-2024-sub/
3	36	animeyy.com	Avatar: The Last Airbender S01E01	animeyy.com/avatar-the-last-airbender-3056/epi-1-57296/	Food Wars! (Shokugeki No Souma) S01E01	animeyy.com/food-wars33;-shokugeki-no-soma-2629/epi-1-52869/
4	37	jkanime.net	Food Wars! S01E01	jkanime.net/shokugeki-no-souma/1/	Romantic Killer S01E01	jkanime.net/romantic-killer/1/
5	38	anigo.to	Panda and the Magic Serpent	anigo.to/watch/panda-and-the-magic-serpent-6v5m#ep=1	Batman Ninja	anigo.to/watch/batman-ninja-yz3e#ep=1
6	39	miruro.to	Mob Psycho 100 S02E01	miruro.to/watch/101338/mob-psycho-100-ii/episode-1	Romantic Killer S01E01	miruro.to/watch/153930/romantic-killer/episode-1
7	40	pelisplushd.to	Barbie	pelisplushd.to/pelicula/barbie	The Little Mermaid	pelisplushd.to/pelicula/la-sirenita-447277
8	41	goyabu.to	Hi Score Girl S01E01	goyabu.to/10290	Tengoku-Daimakyo S01E01	goyabu.to/48709
9	42	bronat.lat	A Quiet Place - Day 1	bronat.lat/pelicula/un-lugar-en-silencio-dia-uno/	Moana 2	bronat.lat/pelicula/moana-2-kdso/
10	43	westream.to	Tenet	westream.to/movie/tenet-	Jumanji: The Next Level	westream.to/watch-movie/jumanji-

			2020-stream-63301/1149873		the-next-level-2019-stream-1663/1130807
44	bingewatch.to	Tenet	bingewatch.to/watch-movie/watch-tenet-hd-63301/1149873	Jumanji: The Next Level	bingewatch.to/watch-movie/watch-jumanji-the-next-level-hd-1663/1130807
45	opmovies.tv	Tenet	opmovies.tv/watch-movie/tenet-full-63301/1149873	Jumanji: The Next Level	opmovies.tv/watch-movie/jumanji-the-next-level-full-1663/1130807
46	yflix.to	Tenet	yflix.to/watch/tenet.ndxx1d#ep=1	Jumanji: The Next Level	yflix.to/watch/jumanji-the-next-level.kl7w55#ep=1

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 October 20, 2025.

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6 *Larissa Knapp*

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Larissa Knapp
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