



**Request for DMCA Subpoena**

**Deborah J. Perea** to: newcases.tacoma@wawd.uscourts.gov  
Cc: Spencer Freeman

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From: "Deborah J. Perea" <dmjperea55@outlook.com>  
To: "newcases.tacoma@wawd.uscourts.gov" <newcases.tacoma@wawd.uscourts.gov>  
Cc: Spencer Freeman <sfreeman@freemanlawfirm.org>

TO: Clerk of the United States District Court, Western District of Washington

This office represents MG Premium Ltd ("MG") in its request for issuance of a Subpoena to service provider Cloudflare, Inc. ("Cloudflare) pursuant to U.S.C. § 512(h) ("DMCA Subpoena"). The DMCA Subpoena requests the identification of infringers of MG's copyrighted material posted on **Waxtube.com**.

To this end, the following documents are attached pursuant to the statute's requirements to enable the Clerk to issue such Subpoena:

- Letter requesting the Clerk's issuance of the DMCA Subpoena;
- Proposed DMCA Subpoena to Cloudflare (re "**waxtube.com**"); and
- Sworn Declaration of Anis Baba in support of the DMCA Subpoena.

Copies of the notifications issued under 17 U.S.C. § 512(c)(3)(A) to the DMCA Agent for Cloudflare are attached to both Subpoena and Declaration. We believe that the materials submitted herewith will enable you to issue the requested DMCA Subpoena.

We'll look forward to your call for the \$47.00 filing fee once a miscellaneous case number has been assigned, and to subsequent issuance of the DMCA Subpoena.

Thank you in advance for your assistance in this matter.

~Deb

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