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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

In Re:

DMCA SUBPOENA TO CLOUDFLARE,
INC.,

Service Provider.

Case No.: **3:19-mc-05029**

DECLARATION IN SUPPORT OF
REQUEST FOR DMCA SUBPOENA TO
CLOUDFLARE, INC.

DECLARATION IN SUPPORT OF
REQUEST FOR DMCA SUBPOENA
TO CLOUDFLARE, INC. - 1

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98402
(253) 383-4500 - (253) 383-4501 (fax)

1 I, ANIS BABA, hereby declare as follows:

2 1. I am a Director of MG Premium Ltd (hereinafter, "MG") and am authorized to act
3 on its behalf. I have personal knowledge of the facts contained herein and, if called upon to do
4 so, could and would testify competently thereto.

5 2. I submit this declaration in support of MG's request for issuance of a Subpoena
6 by the Clerk of this Court, pursuant to the Digital Millennium Copyright Act ("DMCA"), 17
7 U.S.C. § 512(h) to Cloudflare, Inc. ("Cloudflare"), relating to the posting of MG's copyrighted
8 material on the domain, waxtube.com, a webpage hosted by Cloudflare.

9 3. I have personal knowledge of the copyrights owned by MG and the ongoing
10 infringements of those copyrights that occur on the internet. I also have personal knowledge of
11 the countless instances that MG's copyrighted works have been posted without MG authorization
12 to waxtube.com.

13 4. On July 8, 2019, authorized agent for MG Vobile, Inc. issued and served a
14 copyright infringement notification on Cloudflare's DMCA Agent relating to posts on
15 waxtube.com. Pursuant to Section 512(c)(3)(A), the notifications were properly signed by MG's
16 agent, identified the copyrighted material being infringed, set forth a listing of the 60 URLs
17 containing posts of infringing material, confirmed that such use of MG's copyrighted works was
18 not authorized by MG, and gave contact information such that the DMCA Agent could reach
19 MG's Agent with questions. A true and correct copy of a July 8, 2019 notification is attached as
20 Exhibit A.

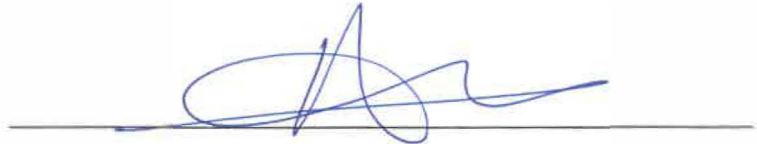
21 5. The purpose of the DMCA Subpoena is to obtain information sufficient to
22 identify alleged infringers who, without authorization from MG, posted material to the web page
23 waxtube.com, which infringed copyrights held by MG. The information received as a result of
24 the Subpoena will only be used by MG to protect its rights under Title 17 of the United States
25 Code.

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DECLARATION IN SUPPORT OF
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TO CLOUDFLARE, INC. - 2

FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98402
(253) 383-4500 - (253) 383-4501 (fax)

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

3 DATED this 15 day of July, 2019, at Nicosia, Cyprus.

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7 ANIS BABA
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Exhibit A

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**Notifications of Copyright Infringements
Issued Pursuant to
17 U.S.C. § 512(c)(3) to
Registered DMCA Agent for
Service Provider Cloudflare, Inc.**

From: agent@[REDACTED]yright-notice.com
Sent: Monday, July 8, 2019 12:38 PM
To: dmca@cloudflare.com; abuse@name.com; waxtube@yandex.com
Cc: abuse@cloudflare.com
Subject: 4th DMCA Copyright Infringement Notice

4th DMCA Copyright Infringement Notice

Notice Date: 07/08/2019

To Whom It May Concern,

DMCA Copyright Infringement Notice

1. Infringed Work: Reality Kings

I, the undersigned, do solemnly and sincerely declare and certify under penalty of perjury that:

1. I am the agent authorized to act on behalf of MG Premium Ltd the "Owner" of the copyrighted material referred below;
2. I have a good faith belief that the use of materials identified below is not authorized by the Owner and therefore infringes on its rights pursuant to Section 512 (c) of the U.S. Copyright Law. Pursuant to this notification, you should immediately take steps to locate and remove and/or disable access to the content that is on your system. If you are a service provider, you may otherwise be liable for copyright infringement if, upon obtaining knowledge or awareness of infringing material being stored upon your network, you do not act expeditiously to remove, or disable access to, the material.
3. To the best of my knowledge the information contained within this notice is accurate and correct.

Signed

Vobile, Inc.
2880 Lakeside Drive, Suite 360
Santa Clara, CA 95054
[REDACTED]

Infringing Links

REALITY KINGS - 5868 - Bang Thee Banshee

<https://waxtube.com/video/realitykings-bang-thee-banshee-mike-in-brazil-01-30-2006-28330.html>
<https://media5.waxtube.com/media/videos/d/d/7/0/4/dd70421db80a4266fa26040039051018.mp4?md5=T838M4QPXSuLRIaQVIWlQ&expires=1561558781>

REALITY KINGS - 6424 - Eager To Please

<https://waxtube.com/video/realitykings-eager-to-please-mike-s-apartment-02-13-2006-28353.html>
https://media5.waxtube.com/media/videos/6/1/5/7/f/6157f9b7efb8f3f134dc141c57994945.mp4?md5=8Lf3trgsFA2ik-H_Yg00yw&expires=1561558782

REALITY KINGS - 28 - Double Dipped N Coco

<https://waxtube.com/video/realitykings-double-dipped-n-coco-40-inch-plus-01-09-2006-28376.html>
https://media5.waxtube.com/media/videos/d/f/b/9/d/dfb9d951398cc34e52870dd59d78a95e.mp4?md5=QYx7nkWm4WWkMr_61Dc1cw&expires=1561558781

REALITY KINGS - 3742 - Aces High

<https://waxtube.com/video/realitykings-aces-high-euro-sex-parties-01-09-2006-28372.html>
<https://media5.waxtube.com/media/videos/d/2/2/4/5/d22452fa28e1f6bb8f4c1df74d253cef.mp4?md5=AVrt8ZJDQENDsTnHu89exQ&expires=1561558781>

REALITY KINGS - 3762 - Ass Menagerie

<https://waxtube.com/video/realitykings-ass-menagerie-euro-sex-parties-01-16-2006-28384.html>
<https://media5.waxtube.com/media/videos/3/d/7/2/7/3d72787af4472e5704e2495603247203.mp4?md5=dQVS4NCIzgwiOeU9vFthCw&expires=1561558782>

REALITY KINGS - 2623 - nightvision

<https://waxtube.com/video/realitykings-nightvision-captain-stabbin-01-09-2006-28375.html>
https://media5.waxtube.com/media/videos/6/d/9/8/a/6d98ab32929209309da6f73aa99d3a7d.mp4?md5=Cna9K_9rNR2ST5NwLbJIQ&expires=1561558781

REALITY KINGS - 6366 - Butter Finger Dip

<https://waxtube.com/video/realitykings-butter-finger-dip-mike-s-apartment-02-03-2006-28334.html>
<https://media5.waxtube.com/media/videos/7/7/4/f/f/774ffe8afde55f68a636f93cbcd763ba.mp4?md5=E9hcOVRwnWOOPS8FSF7Tlg&expires=1561558781>

REALITY KINGS - 69 - Tool Time

<https://waxtube.com/video/realitykings-tool-time-40-inch-plus-01-23-2006-28396.html>
https://media5.waxtube.com/media/videos/c/d/3/9/b/cd39b6acd979c84ee604e91317b47ffd.mp4?md5=eJYkeZ_wT6YWUHKWkt4VZA&expires=1561558781

REALITY KINGS - 4526 - Beginner Luck

<https://waxtube.com/video/realitykings-beginner-luck-first-time-auditions-02-06-2006-28342.html>
<https://media5.waxtube.com/media/videos/a/4/a/f/9/a4af931f8ea0253286d76d200215f878.mp4?md5=bca8NeyqFY8a gSzLFPNLiA&expires=1561558782>

REALITY KINGS - 6106 - Pool Shark

<https://waxtube.com/video/realitykings-pool-shark-mike-in-brazil-01-02-2006-28365.html>
<https://media5.waxtube.com/media/videos/d/a/9/b/0/da9b03345fcbad252ac7d39134d9afc3.mp4?md5=KV0WFnfRXM3MAqx5KSeEWw&expires=1561558781>

REALITY KINGS - 3115 - Kara Package

<https://waxtube.com/video/realitykings-kara-package-cum-fiesta-01-09-2006-28374.html>
<https://media5.waxtube.com/media/videos/6/9/f/4/c/69f4c3fd88c82acf58f6cb970b23ab2e.mp4?md5=aRWmne0-vb0t1zNv9sufyQ&expires=1561558780>

REALITY KINGS - 4524 - Beginners Fuck

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<https://waxtube.com/video/realitykings-beginners-fuck-first-time-auditions-01-16-2006-28382.html>
https://media5.waxtube.com/media/videos/0/0/7/5/6/007562eae4336c9091d601d4997d14b3.mp4?md5=_sdjcJDRECO1-mrR_zAzxg&expires=1561558782

REALITY KINGS - 13 - Bizzy Buns

<https://waxtube.com/video/realitykings-bizzy-buns-40-inch-plus-02-06-2006-28337.html>
<https://media5.waxtube.com/media/videos/7/1/3/f/a/713fa5ce35fd5d417692c7e32a306de8.mp4?md5=XXHAIGhWMfxFbKj0xEziiw&expires=1561558781>

REALITY KINGS - 4655 - Innocence Lost

<https://waxtube.com/video/realitykings-innocence-lost-first-time-auditions-01-23-2006-28400.html>
<https://media5.waxtube.com/media/videos/1/9/9/f/e/199fed247450e0e6cbf763ae0da319d4.mp4?md5=O2qlk08hZ53YDdwuQZuUWQ&expires=1561558782>

REALITY KINGS - 4608 - First Time Long Time

<https://waxtube.com/video/realitykings-first-time-long-time-first-time-auditions-01-09-2006-28371.html>
https://media5.waxtube.com/media/videos/9/6/3/5/6/96356474db54dd41be2e5a72ccdeaa64.mp4?md5=py_IE7YiHxGp_UfSaPfxew&expires=1561558782

REALITY KINGS - 9429 - Asian Beaver

<https://waxtube.com/video/realitykings-asian-beaver-street-blowjobs-02-15-2006-28364.html>
https://media5.waxtube.com/media/videos/7/5/d/c/8/75dc89c8af436fa268f0b88dec82f406.mp4?md5=Zqzr_oEhiu99VfpY2H3yYA&expires=1561558781

REALITY KINGS - 9969 - Wetty Betty

<https://waxtube.com/video/realitykings-wetty-betty-street-blowjobs-02-01-2006-28333.html>

https://media5.waxtube.com/media/videos/d/f/2/9/9/df299411e839bcc207e9b7052faa1141.mp4?md5=JUGFfAb-ZkccjLbsT00_Q&expires=1561558781

REALITY KINGS - 5924 - Coco Loco

<https://waxtube.com/video/realitykings-coco-loco-mike-in-brazil-02-06-2006-28344.html>

<https://media5.waxtube.com/media/videos/e/d/b/5/8/edb5804a691a0a2d941216f6388bd6bb.mp4?md5=T0vm0cwpa-oWa55vW1Y5hYw&expires=1561558781>

REALITY KINGS - 957 - Backdoor Big Natty

<https://waxtube.com/video/realitykings-backdoor-big-natty-big-naturals-01-02-2006-28367.html>

<https://media5.waxtube.com/media/videos/6/6/0/b/5/660b59eeb02c49d11b29cc7d03074c8d.mp4?md5=FopSpQU0f8k0SliKMltoAQ&expires=1561558782>

REALITY KINGS - 5988 - Gut Ream

<https://waxtube.com/video/realitykings-gut-ream-mike-in-brazil-01-16-2006-28390.html>

<https://media5.waxtube.com/media/videos/c/5/9/4/7/c5947f1f3cefb736fc760bc75212efc2.mp4?md5=FD1rrcO4JQrWB-RPb8YVKGQ&expires=1561558781>

REALITY KINGS - 10000 - Hose Em Down

<https://waxtube.com/video/realitykings-hose-em-down-team-squirt-02-06-2006-28346.html>

<https://media5.waxtube.com/media/videos/e/2/a/8/4/e2a842bd27725b4a62a0bce2c1b0c931.mp4?md5=YMy2ozpAdT-C6okbdtAhww&expires=1561558781>

REALITY KINGS - 10001 - Hum Away

<https://waxtube.com/video/realitykings-hum-away-team-squirt-02-13-2006-28349.html>

<https://media5.waxtube.com/media/videos/d/3/e/1/6/d3e1691c15bfc4d175c76d9aba7af4bc.mp4?md5=Z6iX1IRKN94LR-iwNm93OQ&expires=1561558781>

REALITY KINGS - 10026 - Squirting On A Dime

<https://waxtube.com/video/realitykings-squirting-on-a-dime-team-squirt-01-30-2006-28325.html>
<https://media5.waxtube.com/media/videos/8/4/8/3/d/8483d0f3b1bf5af92ca5971b6d799701.mp4?md5=yGCNCjOARlcNQijhfk-MoQ&expires=1561558781>

REALITY KINGS - 3958 - Ill Take Two Please

<https://waxtube.com/video/realitykings-ill-take-two-please-euro-sex-parties-01-30-2006-28327.html>
<https://media5.waxtube.com/media/videos/7/4/5/b/1/745b10a91c98999d068e5029682be3d4.mp4?md5=bfDC-TxYDMvEEksB3IGiwg&expires=1561558782>

REALITY KINGS - 9956 - tubesteak

<https://waxtube.com/video/realitykings-tubesteak-street-blowjobs-01-18-2006-28392.html>
<https://media5.waxtube.com/media/videos/6/b/c/3/8/6bc384bffaf23e1e8f8b5f8570ece7e9.mp4?md5=VyErjvfSZ4noa9Jhqnl-vQ&expires=1561558781>

REALITY KINGS - 6301 - All Lubed Up

<https://waxtube.com/video/realitykings-all-lubed-up-mike-s-apartment-01-30-2006-28411.html>
https://media5.waxtube.com/media/videos/f/e/4/4/1/fe441988daeb04907d764d4f9802abcf.mp4?md5=1-WYbLxEdlZsH_HeULWzog&expires=1561558782

REALITY KINGS - 70 - Trampoline Escapade

<https://waxtube.com/video/realitykings-trampoline-escapade-40-inch-plus-02-13-2006-28359.html>
<https://media5.waxtube.com/media/videos/3/1/f/0/1/31f01413a009e932505fe42e1727025a.mp4?md5=nAuFOtwKKMH1mwCgEejLkQ&expires=1561558780>

REALITY KINGS - 2585 - Hammock Hottie

<https://waxtube.com/video/realitykings-hammock-hottie-captain-stabbin-02-10-2006-28348.html>

<https://media5.waxtube.com/media/videos/9/b/9/2/1/9b92136d9a766ab3d903140f710df108.mp4?md5=eDGSbrhp1Aa1g-XRreB-3g&expires=1561558781>

REALITY KINGS - 6315 - Ass Pleasure

<https://waxtube.com/video/realitykings-ass-pleasure-mike-s-apartment-01-16-2006-28387.html>

<https://media5.waxtube.com/media/videos/e/d/7/9/5/ed79568e604ec3851f9d4634c4b7fd06.mp4?md5=He2edVx6Jg!N0HsTeeGKMQ&expires=1561558781>

REALITY KINGS - 10742 - Browsing For Pussy

<https://waxtube.com/video/realitykings-browsing-for-pussy-we-live-together-02-13-2006-28356.html>

<https://media5.waxtube.com/media/videos/8/e/6/2/c/8e62cd93e95e57284fd0134fb31c7efc.mp4?md5=eydb-xXqAxU5Fmfy7DGo6A&expires=1561558782>

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