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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION

11
12 IN RE DMCA SUBPOENA TO
PORNHUB.COM

CASE NO.: 2:17-mc-00038

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14 **DECLARATION OF PHILIP
BRADBURY IN SUPPORT OF
DMCA SUBPOENA TO
PORNHUB.COM**
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DECLARATION OF PHILIP BRADBURY

I, Phil Bradbury, hereby declare as follows:

1. I am the Director at Foshan Ltd. (“Foshan”). As part of my duties, I am responsible for addressing infringement of copyrights owned by Foshan and its affiliated companies. I have personal knowledge of the facts contained herein and, if called upon to do so, I could and would testify competently thereto.

2. I am authorized to act on Foshan’s behalf. I submit this declaration in support of Foshan’s request for issuance by the Clerk of this Court to Pornhub.com (“PornHub”) of a subpoena, pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h) (the “DMCA Subpoena”) to obtain information sufficient to identify alleged infringers who posted material to PornHub which infringe copyright rights held by Foshan, without Foshan’s authorization.

3. With the authorization of Foshan, and pursuant to 17 U.S.C. § 512(c)(3), on March 24, 2017, LeeAnn Scaife sent PornHub’s registered DMCA agent, Lawrence G. Walters, a notification that Foshan’s copyrighted works were available on PornHub without Foshan’s authorization. The notification provided a list of all of Foshan’s copyrighted works, identified by title and location, and the URL where each infringing copy appears, without authorization, on PornHub. A true and correct copy of that notification and the accompanying list of infringing works are attached hereto as **Exhibit A**.

4. The purpose of this subpoena is to obtain the identity of alleged infringers, and such information obtained will only be used for the purpose of protecting rights under Title 17 of the United States Code, pursuant to 17 U.S.C. § 512(h)(2)(C).

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

3 Executed on March 27, 2017 at Windsor, Canada.

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5 By:  _____
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