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8 Attorney for The Football Association
9 Premier League Limited

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **WESTERN DIVISION**

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

Case No. 2:25-mc-133

**DECLARATION OF TIMOTHY
FRANK**

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16 1. I am a partner with the law firm Hagan Noll & Boyle LLC, counsel for
17 The Football Association Premier League Limited (“Premier League”).

18 2. I submit this declaration in support of Premier League’s request for the
19 Clerk of this Court to issue a subpoena to Cloudflare, Inc. (“Cloudflare”) pursuant to
20 17 U.S.C. § 512(h). Premier League owns copyrights in broadcasted Premier League
21 football (soccer) matches, including the right to publicly perform those copyrighted
22 works, that are being infringed through the use of Cloudflare’s system or network, as
23 set forth in Premier League’s notification of claimed infringement.

24 3. The purpose for which the subpoena is sought is to obtain the identity
25 of an alleged infringer of Premier League’s copyrights and such information will only
26 be used for the purpose of protecting rights under Title 17, United States Code.

27 I declare under penalty of perjury that the foregoing is true and correct.
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Executed in the United States on December 19, 2025.

/s/ Timothy M. Frank
Timothy M. Frank