

UNITED STATES DISTRICT COURT  
for the  
Northern District of Texas

In re: Cloudflare, Inc.

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Misc Action No. 3:24-mc-00048

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Justin Paine, Cloudflare Legal Dept.  
101 Townsend Street  
San Francisco, CA 94107

**Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Identifying information, including name, e-mail address, physical address, billing information and any other relevant contact information for the alleged infringer(s) who control the sites at the domains listed in Exhibit A, or control the domains themselves.

Place: Stone & Vaughan, PLLC via e-mail to dmca@stonevaughanlaw.com or fax to 310-756-1201	Date and Time:  On or before 10/01/2024
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**Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: \_\_\_\_\_

CLERK OF COURT

OR

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

\_\_\_\_\_  
*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) Webtoon  
Entertainment Inc., who issues or requests this subpoena, are:

Evan Stone, 317 S. Division St., #52, Ann Arbor, MI 48104, dmca@stonevaughanlaw.com, 469-248-5238

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_

on *(date)* \_\_\_\_\_ .

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the subpoena unexecuted because: \_\_\_\_\_

\_\_\_\_\_ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_ *Server's signature*

\_\_\_\_\_ *Printed name and title*

\_\_\_\_\_ *Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

# Exhibit A

## Domain list

lmanga.co  
lmanhwa.com  
1stkissmanga.io  
1stkissmanga.me  
astrascans.org  
asurahunter.com  
asuratoon.com  
bacakomik.my.id  
bacakomik.net  
bacamanga.id  
bato.to  
chapmanga.net  
clover-manga.com  
cn.webmota.com  
coffeemanga.io  
comic24hnn.com  
cosmicscans.id  
doombreaker.com  
dsectcomics.org  
earlym.org  
emperor-scan.com  
emperorscan.net  
enryumanga.com  
es.manytoon.me  
eztoon101.com  
fcmanga.net  
fecomicc.xyz  
flamecomics.me  
fr.freecomiconline.me  
fr.manhwa18.org  
fr.readergen.fr  
freemanga.me  
god-manga.com  
haremscann.es  
harimanga.com  
hippo-manga.com  
hippomanga.com  
hivetoon.com  
hwago.org  
id.freecomiconline.me  
immortalupdates.com  
infinitelevelup.com  
jimanga.com  
joji-manga.com  
kaiscans.org  
kingofmanga.com  
klikmanga.id

komik20.com  
komikcast.cafe  
komikcast.cz  
komikdaily.my.id  
komikindo.co  
komikindo.moe  
komiku.com  
komikuwu.com  
kumomanga.com  
kumomanga.net  
kunmanga.com  
kunmanga.to  
lectormiau.com  
leerolymp.com  
likemanga.io  
lscomic.com  
luminous-scans.com  
luxmanga.net  
mafia-manga.com  
manga-lucky.com  
manga-za.com  
manga18.me  
manga18fx.com  
mangabtt.com  
mangaclash.com  
mangadass.com  
mangadex.tv  
mangadop.net  
mangaeffect.com  
mangaesp.co  
mangaextreme.com  
mangafire.to  
mangafox.fun  
mangagalaxy.me  
mangahasu.se  
mangaindo.org  
mangakatana.com  
mangakomi.io  
mangaku.io  
mangapanda.in  
mangapill.com  
mangaqueen.com  
mangaraw.org  
mangareader.cc  
mangareader.to  
mangarolls.com  
mangascan.cc

mangatale.co  
mangatx.to  
mangauwu.com  
manhuafast.top  
manhuazone.com  
manhwa-thailand.com  
manhwa18.cc  
manhwabtt.com  
manhwaclan.com  
manhwafull.net  
manhwanew.com  
manhwatop.to  
manhwatube.com  
mercenary-manga.com  
miku-manga.com  
mt.manytoon.me  
murim-manga.com  
murimrpgsimulation.com  
murimscan.run  
nanomachinemanga.com  
nanomachinenow.com  
natsu.id  
niadd.com  
night-scans.com  
ninemanga.com  
nitroscans.online  
oktoon.com  
omniscient-readersviewpoint.com  
paragonscans.com  
ped-manga.com  
popsmanga.com  
quest-supremacy.com  
questismmanga.com  
raw.senmanga.com  
rawrmanga.com  
read-lookism.com  
readcomicmanga.com  
readrealityquest.com  
regressorofthefallenfamily.com  
retsu.co  
romantikmanga.com  
rose-manga.com  
shibamanga.com  
solo-max.com  
spy-manga.com  
sso.mangatown.com  
teamxnovel.com

templescan.net  
tenshi.id  
thunderscans.com  
toomtam-manga.com  
toongod.cc  
toonily.me  
towerofgodmanhwa.com  
tukangkomik.com  
tusmangas.org  
tw.52hah.com  
v1.earlym.org  
v1.namedtoon.com  
visortmo.ws  
w1.thebreakermanhwa.com  
w2.thebreakermanhwa.com  
w3.lookismmanga.com  
w3.thetowerofgod.com  
webtoonhatti.net  
webtoonscan.com  
weimanga.com  
windbreakermanga.com  
ww.mangadex.tv  
ww1.windbreakermanga.com  
ww5.manganelo.tv  
ww8.mangakakalot.tv  
www.thegodofhighschool.online  
www.burningtoon.com  
www.doombreaker.org  
www.kanmanhuala.cc  
www.komikid.com  
www.lami-manga.com  
www.manga-kakalot.net  
www.mangakakalot.nl  
www.mangaread.org  
www.mangareader.cc  
www.mangatv.net  
www.manhwakakalot.com  
www.mcreader.net  
www.mhmfk.com  
www.ranker-manga.com  
www.tanuki-manga.com  
www.up-manga.com  
www.vfscan.cc  
www.weakherocharacters.com  
www2.mangamew.com  
xenon-manga.com  
xn--72ca0fwcc.net



xn--vv4b11c.com  
yaoiscan.com  
zahard.xyz