Paul D. Polidoro, Esq.
WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA
Legal Department
100 Watchtower Drive
Patterson, NY 12563
Telephone: 845-306-1000
Facsimile: 845-306-0709
Email: ppolidor@jw.org

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

In Re DMCA Subpoena to Google LLC	**Case No. 7:19-mc-82** **Watch Tower Bible and Tract Society's Request to the Clerk for Issuance of Subpoena to Google LLC, Pursuant to 17 U.S.C. § 512(h) to Identify Alleged Infringer**

Plaintiff, Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "Watch Tower") through its undersigned counsel of record, hereby requests that the Clerk of this Court issue a subpoena to Google LLC to identify alleged infringers at issue, pursuant to the Digital Millennium Copyright Act ("DMCA"), 17 U.S.C. § 512(h) (hereinafter the "DMCA Subpoena"). The proposed DMCA Subpoena is attached hereto as Exhibit A.

The DMCA Subpoena is directed to Google LLC, the service provider of a YouTube account to which the infringing party using the name "Historia y Ayuda Teocrática JW" posted content at the URLS:

https://www.youtube.com/watch?v=yqUoZ4b4G3Q
https://www.youtube.com/watch?v=hhs1r4zI_wM
https://www.youtube.com/watch?v=BLTG_ueFJr8
https://www.youtube.com/watch?v=qujIKMRaVHw
https://www.youtube.com/watch?v=5hJ0a2_a7b8
https://www.youtube.com/watch?v=Or3vojrBR0I
https://www.youtube.com/watch?v=5vaWm5t-DSQ
https://www.youtube.com/watch?v=yqUoZ4b4G3Q
https://www.youtube.com/watch?v=LikBJrF4OYQ
https://www.youtube.com/watch?v=BLTG_ueFJr8

This content infringes copyrights held by Watch Tower. (*See* Declaration of Paul D. Polidoro dated February 25, 2019 (hereinafter "Polidoro Decl.").

Watch Tower has satisfied the requirements for issuance of a subpoena pursuant to 17 U.S.C. § 512(h), namely:

(1) Watch Tower has submitted a copy of a notification sent pursuant to 17 U.S.C. § 512(c)(3)(A) as Exhibit 1 to the Declaration of Paul D. Polidoro.

(2) Watch Tower has submitted the proposed DMCA Subpoena attached hereto as Exhibit A; and

(3) Watch Tower, through its counsel of record, has submitted a sworn declaration confirming that the purpose for which the DMCA subpoena is sought is to obtain the identity of an alleged infringer or infringers, and that such information will only be used for the purpose of protecting Watch Tower's rights under Title 17 U.S.C. §§ 100, et. seq.. *See* Polidoro Decl., ¶ 4.

Having complied with the statutory requirements, Watch Tower respectfully requests that the Clerk expeditiously issue and sign the proposed DMCA Subpoena pursuant to 17 U.S.C. § 512(h)(4).

Dated: February 25, 2019

/s/ Paul D. Polidoro
Paul D. Polidoro
Associate General Counsel
SDNY Bar No. PP2509
WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA
Legal Department
100 Watchtower Drive
Patterson, NY 12563
Telephone: 845-306-1000
Facsimile: 845-306-0709
Email: ppolidor@jw.org
Attorney for Plaintiff