

EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 11-20427-JORDAN

DISNEY ENTERPRISES, INC.,
TWENTIETH CENTURY FOX FILM CORPORATION,
UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP,
COLUMBIA PICTURES INDUSTRIES, INC., and
WARNER BROS. ENTERTAINMENT INC.,

Plaintiffs,

v.

HOTFILE CORP., ANTON TITOV, and
DOES 1-10.

Defendants.

**DEFENDANT HOTFILE CORP.'S FIRST SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS**

PROPOUNDING PARTY: Defendant Hotfile Corporation

RESPONDING PARTIES: Plaintiffs Disney Enterprises, Inc., Twentieth Century Fox
Film Corporation, Universal City Studios Productions
LLLP, Columbia Pictures Industries, Inc., and Warner
Bros. Entertainment

SET NO.: One (1)

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant Hotfile Corporation (“Hotfile”) requests that Plaintiffs provide written objections and responses to these requests for production within thirty (30) days of service, and produce the documents identified below within their possession, custody, or control to Farella Braun + Martel LLP, 235 Montgomery Street, 17th Floor, San Francisco, California, 94104 within forty-five (45) days of service of this request.

REQUEST NO. 7:

All agreements or other DOCUMENTS relating to any use, transfer, sale, license or other transactions regarding any work that YOU allege HOTFILE has infringed in this action.

REQUEST NO. 8:

All licenses or other agreements relating to any use (including license to any rights under 17 U.S.C. § 106) of YOUR works that YOU allege HOTFILE infringed or infringes.

REQUEST NO. 9:

All DOCUMENTS concerning any and all takedown notices sent by YOU or your DMCA agents to HOTFILE.

REQUEST NO. 10:

All DOCUMENTS that refer or relate to the protections of the DMCA, 17 U.S.C. § 512(c).

REQUEST NO. 11:

All DOCUMENTS concerning the difficulty or challenges of identifying infringing content on the Internet.

REQUEST NO. 12:

All DOCUMENTS evidencing any visits to hotfile.com or browsing of hotfile.com by YOU or YOUR agents.

REQUEST NO. 13:

All DOCUMENTS RELATING TO or evidencing the use of HOTFILE's special rights holder accounts on hotfile.com by YOU or YOUR agents.

REQUEST NO. 14:

All DOCUMENTS, including but not limited to downloaded and/or electronic files, RELATING TO investigations of hotfile.com or its known users or affiliates.

REQUEST NO. 15:

All DOCUMENTS RELATING TO the legitimacy or illegitimacy of the business models of online file-hosting or file-sharing services, including Hotfile.com, RapidShare, MegaUpload,