

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.

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO COMPEL
RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS AND
INTERROGATORIES**

Upon consideration of Plaintiffs' Motion to Compel Responses to Requests for Production of Documents and Interrogatories, and all of the papers submitted in support thereof, Plaintiffs' request to compel responses is GRANTED. The Court finds that defendants should be ordered to produce responses to Requests For Production Nos. 5(i), 17, 28, 31, and Interrogatory Nos. 4 and 10 as requested in plaintiffs' motion, as follows.

It is hereby ORDERED that Defendants Hotfile Corp. and Anton Titov shall produce:

- a. All documents reflecting the use of the Hotfile service by an employee, owner, shareholder, principal, officer, director, agent, or contractor of any Defendant or "Hotfile Entity" (defined to include Hotfile Corp., Hotfile, Ltd., or any other entity involved in the operation of Hotfile), as requested in Plaintiffs' Request for Production No. 28, including (a) the files uploaded by any such individual or entity, and (b) the files downloaded by any such individual or entity;

- b. A complete response to Plaintiffs' Interrogatory No. 4, including the identification of each person who has promised to provide, or with whom defendants have had any discussions about providing capital or financing for any Hotfile Entity ("Potential Investors");
- c. Documents concerning presentations, solicitations, materials provided to, and communications with Potential Investors, as requested in Plaintiffs' Request for Production No. 5(i);
- d. A complete response to Plaintiffs' Interrogatory No. 10 specifying the reasons for any termination, limitation, account suspension, or any other penalty imposed on each Hotfile user whose access to the Hotfile website has ever been terminated, limited, suspended, or otherwise penalized by any Defendant or other Hotfile Entity, including whether the user was believed or alleged to be a copyright infringer or a repeat infringer;
- e. All documents pertaining to the role of any Hotfile Entity in the operation of the Hotfile website, as requested in Plaintiffs' Request for Production No. 31, including documents regarding (a) any overlap of officers, directors, employees, or other persons between the Hotfile Entities; (b) any common ownership between the Hotfile Entities; (c) any shared property holdings between the Hotfile Entities; (d) any agreements or contracts between the Hotfile Entities; (e) any financial arrangements between the Hotfile Entities; (f) the provision of services between any Hotfile Entities; and (g) each Hotfile Entity's role in the operation of the Hotfile website; and
- f. Portions of database schemas used in the operation of all versions of the Hotfile website, as requested in Plaintiffs' Request for Production No. 17, specifically limited to data identifying table names and, for each column in each table, the column name.

IT IS SO ORDERED.

Dated _____, 2011.

United States District Court Judge