

ATTACHMENT A

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.

DEFENDANTS' RESPONSES TO PLAINTIFFS'
FIRST SET OF INTERROGATORIES

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

RESPONDING PARTIES: Defendants Hotfile Corporation and Anton Titov (collectively "Hotfile")¹

SET NO.: One (1)

¹ The Defendants reserve their respective rights to assert all appropriate separate defenses. In particular, Mr. Titov has moved to dismiss all claims against him individually and specifically denies that he has the ability to supervise any alleged infringing activity or has a financial interest in such activity. See Motion and Memorandum Etc., filed 3/31/11, Dkt. 50 at 17. Mr. Titov is included in the shorthand term "Hotfile" along with Hotfile Corp. solely as a convenience and in light of the Parties agreement "that discovery requests served by one side on the opposing side will be equally applicable to all parties on the other side." Joint Scheduling Conference Report, filed 4/15/11, Dkt. 54 at 16. Nothing in these responses is an admission by Anton Titov or Hotfile Corp. of any particular relationship between them or any other fact.

revenues and profits that are not related to the claims of infringement in this litigation. Hotfile further objects to this interrogatory on the grounds that it seeks private and/or confidential financial information. Hotfile further objects that the term “indirectly” is vague and ambiguous as used in this interrogatory.

INTERROGATORY NO. 8:

Identify each participant in the Hotfile “Reseller” program.

RESPONSE TO INTERROGATORY NO. 8:

Hotfile incorporates by reference its general objections to this interrogatory. Hotfile further objects to this interrogatory as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence, including and insofar as it seeks information not related to the claims of infringement in this litigation.

Subject to those general and specific objections, Hotfile responds as follows:

Hotfile’s United States resellers, as shown on Hotfile’s website (<http://www.hotfile.com/resellers.html>), are EasyPayOnline, August Technology, 24instant.com, Hotfile Reseller UK, Microdeluxe.com, Hotfile Premium Spain, Kamilla, One Click Reseller, Premium-Account.org, Premium Accounts Shop, and Larry Chen.

INTERROGATORY NO. 9:

Identify the 500 participants in the Hotfile “Affiliate” programs to whom any Defendant or Hotfile Entity has remitted, directly or indirectly, the largest cumulative payments during the history of Hotfile, and the cumulative amounts of such payments.

RESPONSE TO INTERROGATORY NO. 9:

Hotfile incorporates by reference its general objections to this interrogatory. Hotfile further objects to this interrogatory as overbroad and unduly burdensome to the extent that it seeks information pertaining to any “Hotfile Entity” as that term is defined in the Definitions and Instructions. As currently defined, that term would include any entity, business venture, or organization subject to any Defendant’s control (assuming any such entity, business venture or organization exists), irrespective of whether such entity has any relation or relevance to the

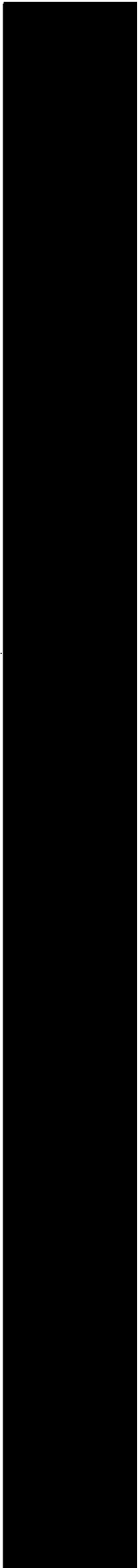
present dispute. Hotfile further objects to this interrogatory on the grounds that it is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence, including and insofar as it seeks information not related to the claims of infringement in this litigation. Hotfile further objects to this interrogatory on the grounds that it seeks private, confidential, personal and financial information about Hotfile’s users. Hotfile further objects that this interrogatory is compound.

Subject to those general and specific objections, Hotfile responds as follows:

User ID	Total Payments
13849	\$
211908	\$
34770	\$
13808	\$
57167	\$
274657	\$
68960	\$
97140	\$
983030	\$
13045	\$
701847	\$
226256	\$
81415	\$
1926356	\$
449327	\$
1481677	\$
2508176	\$
93050	\$
14412	\$
31645	\$
31989	\$
96211	\$
134757	\$
14035	\$
1172962	\$
2240317	\$
103347	\$
15171	\$
814545	\$



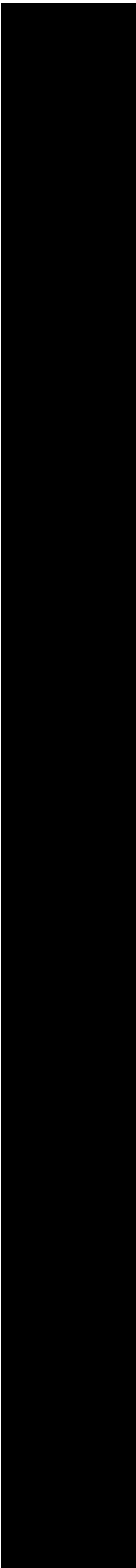
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491856 \$
563900 \$
932956 \$
419536 \$
78460 \$
2535812 \$
964563 \$
50151 \$
13057 \$
584616 \$
552674 \$
1782913 \$
1267676 \$
64414 \$
13962 \$
33273 \$
1473299 \$
15946 \$
320282 \$
44930 \$
45755 \$
507306 \$
230062 \$
242532 \$
379860 \$
717401 \$
295183 \$
21690 \$
603916 \$
3906467 \$
29367 \$
529684 \$
48213 \$
302153 \$
17374 \$
1211195 \$
2003014 \$
1486162 \$
1508405 \$
183201 \$



85771 \$
105527 \$
459973 \$
25663 \$
102220 \$
29839 \$
13725 \$
15348 \$
72133 \$
1105868 \$
988137 \$
27379 \$
14096 \$
411127 \$
3435520 \$
425748 \$
1673737 \$
115007 \$
105475 \$
218273 \$
20058 \$
79408 \$
330285 \$
60823 \$
49779 \$
107222 \$
541238 \$
2378474 \$
397965 \$
293418 \$
835549 \$
199492 \$
1144976 \$
136224 \$
624509 \$
800898 \$
946814 \$
30562 \$
784744 \$
1168695 \$
14706 \$



13336 \$
28270 \$
594907 \$
328995 \$
39369 \$
1767918 \$
56849 \$
220142 \$
19649 \$
103705 \$
204672 \$
14222 \$
26026 \$
655351 \$
26515 \$
1856877 \$
479352 \$
1469115 \$
128913 \$
586734 \$
136792 \$
41279 \$
736037 \$
353573 \$
16257 \$
73010 \$
751047 \$
27892 \$
13717 \$
276517 \$
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2579401 \$
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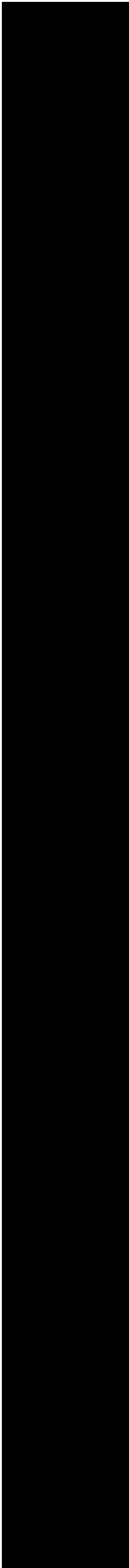
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212711 \$
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453990 \$
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717934 \$
14491 \$
441810 \$
20407 \$
24070 \$
150960 \$
96987 \$
23004 \$
454220 \$
51939 \$
251061 \$
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55630 \$
388566 \$
1165306 \$
314820 \$
2276613 \$
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487454 \$
364950 \$
300236 \$
571107 \$
1017251 \$



54282 \$
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75662 \$
240389 \$
191822 \$
21723 \$
144642 \$
439640 \$
438574 \$
89483 \$
617753 \$
1281096 \$
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1484278 \$
2208597 \$
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1004739 \$
352086 \$
30126 \$
57729 \$
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15160 \$
875794 \$
2126902 \$
993323 \$
1627299 \$
1490049 \$
267003 \$
17179 \$
182035 \$
1796045 \$
1553512 \$
123671 \$
151747 \$
50105 \$
1352897 \$



785799 \$
367896 \$
306949 \$
93395 \$
39627 \$
43581 \$
601345 \$
1707396 \$
53265 \$
78718 \$
1458385 \$
3171726 \$
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22008 \$
92538 \$
665881 \$
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18927 \$
13290 \$
399068 \$
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41495 \$
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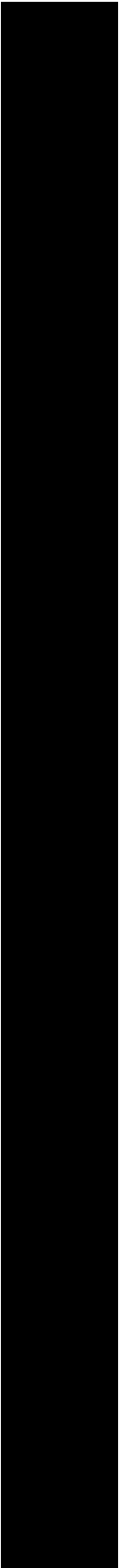
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353404 \$
17411 \$
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352498 \$
207006 \$
932101 \$
98901 \$
34581 \$
137319 \$
302789 \$
438272 \$
453867 \$
1806379 \$
236940 \$
1931637 \$
45668 \$
580230 \$
1667981 \$
56414 \$
34038 \$
1691682 \$
14191 \$
23749 \$
71249 \$
1034491 \$
1269256 \$
231138 \$
2095717 \$
32262 \$
108111 \$
1756996 \$
40140 \$
280974 \$



1766889 \$
2252408 \$
77027 \$
388778 \$
14025 \$
86286 \$
18904 \$
1997589 \$
56128 \$
911271 \$
399763 \$
1967001 \$
27886 \$
291994 \$
340745 \$
788865 \$
52630 \$
14973 \$
2071376 \$
1825916 \$
26264 \$
1000865 \$
1038328 \$
358039 \$
402209 \$
209190 \$
520050 \$
343110 \$
28767 \$
402494 \$
828875 \$
48736 \$
792795 \$
21177 \$
23986 \$
856977 \$
1883519 \$
1303669 \$
2275866 \$
143068 \$
27077 \$



30700 \$
422720 \$
1498995 \$
70957 \$
269575 \$
432839 \$
77961 \$
13266 \$
1166528 \$
2013398 \$
1702970 \$
1662957 \$
594545 \$
1434169 \$
2094178 \$
2058492 \$
1525785 \$
934560 \$
17635 \$
1117230 \$
14466 \$
769561 \$
976302 \$
13088 \$
18912 \$
20261 \$
620155 \$
198460 \$
611251 \$
1521689 \$
19955 \$
60907 \$
360101 \$
165113 \$
1597896 \$
974421 \$
805577 \$
18041 \$
52395 \$
617153 \$
657644 \$



790063 \$
60890 \$
739151 \$
996170 \$
603034 \$
134256 \$
539892 \$
1649804 \$
54976 \$
154157 \$
328305 \$
150850 \$
772409 \$
2127445 \$
146430 \$
148320 \$
1000276 \$
1088042 \$
33242 \$
94120 \$
472862 \$
912388 \$
41078 \$
18860 \$
249090 \$
1650482 \$
1879273 \$
17914 \$
3914047 \$
13791 \$
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1345182 \$
93900 \$
88771 \$
193820 \$
966807 \$
770979 \$
459874 \$
166771 \$
581720 \$
1505748 \$



50082 \$
800485 \$
1705701 \$
797527 \$
21939 \$
1757725 \$
1633993 \$
254874 \$
1904302 \$
387932 \$
38351 \$
446202 \$
2403248 \$
67486 \$
305467 \$
2324855 \$
345009 \$
452118 \$
51179 \$
362913 \$
2148977 \$
78384 \$
578378 \$
30679 \$
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19473 \$
316132 \$
2751794 \$
51129 \$
1938506 \$
97666 \$
1893509 \$
601929 \$
81453 \$
17812 \$
64153 \$
2545316 \$
3147452 \$
13033 \$
563652 \$
43872 \$



167537	\$	[REDACTED]
192353	\$	[REDACTED]
1387691	\$	[REDACTED]
13586	\$	[REDACTED]
431206	\$	4,130.01
458195	\$	[REDACTED]
44936	\$	[REDACTED]
2089624	\$	[REDACTED]
1987253	\$	[REDACTED]
72265	\$	[REDACTED]
13753	\$	[REDACTED]
13964	\$	[REDACTED]
288556	\$	[REDACTED]
1766442	\$	[REDACTED]
593971	\$	[REDACTED]
27263	\$	[REDACTED]
1425702	\$	[REDACTED]
563092	\$	[REDACTED]
130203	\$	[REDACTED]
2003846	\$	[REDACTED]

INTERROGATORY NO. 10:

Identify each user whose access to the Hotfile website any Defendant or Hotfile Entity has ever terminated, limited, suspended, or otherwise penalized, and for each state:

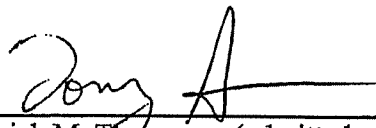
- a) The specific reason(s) therefore;
- b) The date on which such action was taken; and
- c) Whether the user was believed or alleged to be a copyright infringer or a repeat infringer. For purposes of responding to this Interrogatory, Plaintiffs do not believe that Defendants may lawfully withhold information on the basis that it contains identifying information regarding specific Hotfile users. Without prejudice to Plaintiffs' right to seek the identity and additional information pertaining to such users, Defendants may, in the first instance, limit their identification of users in response to this Interrogatory by identifying the users' usernames, Hotfile user identification number, and geographic location (such as by providing country, city and state information and/or sufficient unredacted IP address information).

- d) Any utilities in Titov's name, in whole or in part, for property in Florida;
- e) Any bank accounts Titov has ever held in Florida;
- f) Any travel to Florida in the past ten years, including:
 - i. the length of each such trip;
 - ii. the location where Defendant Titov resided or stayed during each such trip;
 - iii. any persons or entities with whom Defendant Titov met during each such trip; and
 - iv. the substance and purpose of each such trip.

RESPONSE TO INTERROGATORY NO. 11:

Hotfile incorporates by reference its general objections to this interrogatory. Hotfile further objects to this interrogatory as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence, particularly given that Mr. Titov has not contested personal jurisdiction in this matter. Hotfile further objects to this interrogatory as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence in that it seeks categories of information without an ascertainable limitation or relationship to the claims of copyright infringement in this matter. Hotfile further objects that this interrogatory seeks private, confidential and personal information, including financial information and other personal information having no bearing on this lawsuit whatsoever. Hotfile further objects that this interrogatory is compound.

DATED: May 5, 2011

By: 
Roderick M. Thompson (admitted *pro hac vice*)
Andrew Leibnitz (admitted *pro hac vice*)
Anthony P. Schoenberg (admitted *pro hac vice*)
Deepak Gupta (admitted *pro hac vice*)
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And

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Email: jmunn@rascoklock.com

*Counsel for Defendants Hotfile Corp. and Anton
Titov*

VERIFICATION

I, Anton Titov, am a Manager of Hotfile Corporation, a defendant in this lawsuit. I make this verification on behalf of said party and on behalf of myself as an individual. I have read the foregoing Defendants' Responses to Plaintiffs' First Set of Interrogatories and know the contents thereof. To the best of my knowledge, information and belief, the responses set forth therein are true and correct.

I declare under penalty of perjury under the laws of the State of Florida that the foregoing is true and correct.

Executed this 5th day of May, 2011, in Fort Lauderdale, FL

By: _____

Anton Titov