

EXHIBIT “2”

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.

**DECLARATION OF ANTHONY SCHOENBERG IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL RESPONSES TO REQUESTS
FOR PRODUCTION AND INTERROGATORIES**

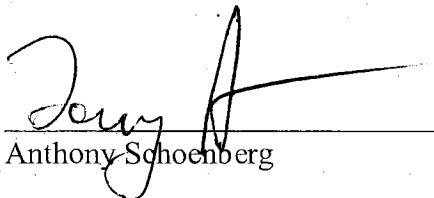
I, Anthony Schoenberg, declare as follows:

1. I am an attorney at Farella Braun + Martel LLP and counsel for defendants Hotfile Corporation and Anton Titov. I have personal knowledge of the matters stated herein and, if called and sworn as a witness, I could and would competently testify to the facts set forth herein.

2. Attached hereto as Exhibit A is a true and correct copy of Defendants' Supplemental Response to Interrogatory No. 1, dated July 19, 2011, from this matter (partially redacted).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 26th day of August 2011, at San Francisco, California.



Anthony Schoenberg

EXHIBIT "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' SUPPLEMENTAL RESPONSE TO PLAINTIFFS'
INTERROGATORY NO. 1

PROPOUNDING PARTY: Plaintiffs Disney Enterprises, Inc., Twentieth Century Fox
Film Corporation, Universal City Studios Productions
LLP, 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.

production, it does so without waiving any right to object to any further inquiry or any effort to compel responses beyond those provided herein. Any response provided herein is subject to, and limited by, all general and specific objections stated herein.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

Identify each person who has been employed by, acted as the agent of, or performed work on behalf of or provided any service to (including as a contractor) the Hotfile Website and each Hotfile Entity from January 1, 2007 through the present day. For each such person or entity, state:

- a) Full name;
- b) Title and/or employer during the period(s) such services or agency were provided (e.g. Hotfile Corp., Hotfile, S.A., Hotfile Ltd., or, if the person is a contractor, the third-party employer);
- c) The nature of all work performed and/or the scope of the person's representation or agency (e.g. database manager, marketing manager, DMCA agent, abuse manager, etc.);
- d) The length of time such person performed relevant services or representation;
- e) Any Hotfile username and user identification number associated with the person; and
- f) Present contact information (including current email address, physical address, and telephone number), or, if present contact information is not known to you, last known contact information. It is not sufficient, for purposes of providing a person's contact information, to state that a person can be contacted through Defendants' counsel.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:

Hotfile has conducted further investigation in response to this interrogatory and discovered additional responsive information.

Hotfile hereby supplements and amends its previous response. This response supersedes and replaces Hotfile's previous response to this Interrogatory No. 1.

RESPONSE TO INTERROGATORY NO. 1:

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 as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence insofar as it seeks information related to "any service" provided to Hotfile, regardless of whether such service has any relevance to the present dispute. Hotfile further objects that this interrogatory is compound.

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

The following individuals worked as contractors or employees of Hotfile Corp.:

[REDACTED]	Software Development Programmer, [REDACTED]
	[REDACTED]
	Employed since approximately August 2008
[REDACTED]	Servers Administration, [REDACTED]
	[REDACTED]
	Employed since September 2009
[REDACTED]	Hotfile Email Support, DMCA Support, Email
	Inquiries Support, [REDACTED]
	[REDACTED]
	Employed since June 2009
[REDACTED]	Manager, [REDACTED]
	[REDACTED]
	Employed since approximately August 2008

REDACTED	Manager, REDACTED REDACTED Employed since approximately August 2008
Anton Titov	Manager, Hotfile, Ltd. REDACTED Employed since approximately August 2008
REDACTED	Hardware & Data Center Support, Private Contractor
REDACTED	Hotfile Email Support, DMCA Support, Email Inquiries Support, Private Contractor REDACTED Employed since February 2010
Constantin Luchian	DMCA Agent Employed since December 2009

Anton Titov can be contacted at:

Farella Braun + Martel LLP
235 Montgomery St.
17th Floor
San Francisco, CA 94102

REDACTED

Constantin Luchian can be contacted at:

Boston Law Group
825 Beacon Street, Suite 20
Newton Centre, MA 02459

Relevant entities related to or doing work on behalf of Hotfile include:

Company Name	Description
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Hotfile Ltd.	Bulgarian limited liability company, wholly owned by Hotfile Corp. Anton Titov is the general manager of Hotfile Ltd. Hotfile Ltd. provides services to Hotfile Corp. related to the processing of PayPal transactions.
Lemuria Communications Inc.	Florida based Internet connectivity and hosting company owned and managed by Anton Titov. Lemuria Communications Inc., provides hosting services for Hotfile Corp.
REDACTED	Bulgarian limited liability company. Owned and managed by REDACTED and REDACTED. REDACTED provides email support and software development services to Hotfile Corp.

DATED: July 19, 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*)
 Janel Thamkul (admitted *pro hac vice*)
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And

Janet T. Munn, Fla. Bar No. 501281
 Rasco Klock
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 Coral Gables, FL 33134
 Telephone: 305.476.7101
 Telecopy: 305.476.7102
 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' Supplemental Response to Plaintiffs' Interrogatory No. 1 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 13 day of July, 2011, in Sofia, Bulgaria.

By: _____

Anton Titov