

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 11-20427-WILLIAMS/TURNOFF

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.*

\_\_\_\_\_ /

HOTFILE CORP.,

*Counterclaimant,*

v.

WARNER BROS. ENTERTAINMENT INC.,

*Counterdefendant.*

\_\_\_\_\_ /

**DECLARATION OF LUKE C. PLATZER IN SUPPORT OF WARNER’S MOTION TO  
COMPEL THE PRODUCTION OF TITOV DEPOSITION EXHIBIT 27**

I, LUKE C. PLATZER, hereby declare as follows:

1. I am a partner at the law firm of Jenner & Block LLP, and counsel to the plaintiffs Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, Universal City Studios Productions LLLP, Columbia Pictures Industries, Inc., and Warner Bros. Entertainment Inc. (“Warner”) in this action (collectively “Plaintiffs”). The statements made in this declaration are based on my personal knowledge including on information provided to me by colleagues or other personnel working under my supervision on this case.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the “rough” transcript of the December 5-8 deposition of Anton Titov, the 30(b)(6) representative for Hotfile in this action.

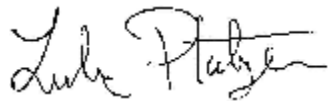
3. Attached hereto as Exhibit B is a true and correct copy of an email exchange between lead counsel Steven B. Fabrizio and Roderick Thompson following the first day of the deposition of Anton Titov, referenced above (December 5, 2011).

4. Defendants produced two copies of the document that was marked as Titov Deposition Exhibit 27; one bearing the Bates number HF00036777 and one bearing the Bates number HF02866338. A true and correct copy of Titov Deposition Exhibit 27, which is a shorter excerpt of the complete 297-page document, is attached hereto as Exhibit C.

5. Defendants clawed back a number of documents (totaling 64) in the days leading up to the commencement of Mt. Titov’s deposition, many of which were in Bulgarian.

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

Executed this 12th day of December, 2011 in Washington, D.C.

A handwritten signature in black ink, appearing to read "Luke Platzer", written in a cursive style.

Luke C. Platzer