

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 PLAINTIFFS' MOTION TO
COMPEL THE DEPOSITION OF [REDACTED]**¹

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. in this action (collectively "Plaintiffs"). The statements made in this declaration are based on my

¹ As Defendants have designated as confidential the name of the relevant employee, his name has been redacted from all publicly filed pleadings.

personal knowledge including on information provided to me by colleagues or other personnel working under my supervision on this case.

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

3. Attached hereto as Exhibit E is a true and correct copy of a document bearing Bates number HF02855404, produced by defendants in this action.

4. Attached hereto as Exhibit F is a true and correct copy of excerpts from the “rough” transcript of the December 8 deposition of [REDACTED]

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

Executed this 13th day of December, 2011 in Washington, D.C.

By: /s/ Luke C. Platzer
Luke C. Platzer