

EXHIBIT “1”

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 RODERICK M. THOMPSON IN SUPPORT OF
DEFENDANTS' MEMORANDUM OF LAW IN OPPOSITION TO
MOTION TO COMPEL DEPOSITION OF ANDREI IANAKOV**

I, Roderick M. Thompson, declare as follows:

1. I am an attorney licensed to practice law in the State of California and am a partner with Farella Braun + Martel LLP, attorneys of record herein for defendants Hotfile Corp. and Anton Titov. I have personal knowledge of the facts set forth below and, if called upon to do so, could and would testify competently thereto.

2. Attached hereto as Exhibits A-C are true and correct copies of excerpts from the “rough” transcript of the December 5-8, 2011 deposition of Anton Titov, taken in his individual capacity and as the 30(b)(6) representative for Hotfile Corporation pursuant to two deposition notices served in this action. Pursuant to the Court’s order, the deposition was taken in Sofia Bulgaria, and despite the Mr. Titov’s agreeing to “commingle” his testimony to simultaneously respond to all three deposition notices, his examination consumed four full days beginning at 9 a.m. and ending at 6 p.m. or later each day.

3. Exhibit A consists of 27:8-10; 27:22-28:10; 100:14-17; and 121:11-15 of Volume I (taken on December 5, 2011). Exhibit B consists of 5:5-19; 61:20-25; 62:18-21; and 151:18-21 of Volume III (taken on December 7, 2011). Exhibit C consists of 16:2-7 and 55:9-23 of Volume IV (taken on December 8 2011).

4. Attached hereto as Exhibit D is a true and correct copy of an email from Andrew Ianakov to one of the owners of Blue Ant, dated December 13, 2011, along with a true and correct copy of a translation into English.

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

Executed on December 19, 2011 at San Francisco, California.

/s/ Roderick M. Thompson
Roderick M. Thompson