

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.

**PLAINTIFFS' MOTION TO SUBSTITUTE NEWLY REDACTED VERSIONS OF
MOTION TO COMPEL THE DEPOSITION OF ANDREI IANAKOV IN PLACE OF
PUBLICLY FILED VERSIONS**

Plaintiffs by and through their undersigned counsel, file this motion to substitute newly redacted versions of the following documents for the public redacted versions that plaintiffs previously filed:¹ (1) Plaintiffs' Motion and Memorandum of Law to Compel the Deposition of

¹ Previous transcript citations were made to the "rough" deposition transcripts initially provided by the court reporters to both sides at the conclusion of each day's testimony. The final versions of the deposition transcripts have since become available. Accordingly, plaintiffs are updating

Andrei Ianakov and Request for Expedited Briefing; (2) Proposed Order Granting Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov; (3) Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov; (4) Exhibit A to the Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov; (5) Exhibit B to the Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov; (6) Exhibit C to the Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov; (7) Exhibit D to the Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov; (8) Exhibit E to the Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov; and (9) Exhibit F to the Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov (9). The newly redacted versions of these documents are attached hereto as Attachments A, B, C, D, E, F, G, H, and I, respectively.

Plaintiffs are publicly filing newly redacted versions as defendants have agreed that the previously redacted material based on defendants’ confidentiality designation may now be publicly filed. Plaintiffs previously filed a motion (which they are now withdrawing) to file the unredacted versions of those document under seal (Dkt # 186), and served those unredacted versions on the defendants concurrently with publicly filing and serving the redacted versions. Plaintiffs therefore seek to substitute the attached documents for the redacted versions previously filed. Counsel for plaintiffs have conferred with counsel for defendants, and defendants do not oppose this Motion.

Therefore, plaintiffs request that the Court grant this motion and substitute the attached documents as follows:

Attachment to Motion	To Be Substituted As
A – Plaintiffs’ Motion and Memorandum of Law to Compel the Deposition of Andrei Ianakov and Request for Expedited Briefing	Docket No. 184
B – Proposed Order Granting Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov	Docket No. 184-1
C – Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov	Docket No. 185-1

both the exhibits to the Declaration of Luke C. Platzer and the transcript citations in the Motion to Compel to reflect the final versions of the deposition transcripts.

D – Exhibit A to the Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov	Docket No. 185-2
E – Exhibit B to the Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov	Docket No. 185-3
F – Exhibit C to the Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov	Docket No. 185-4
G – Exhibit D to the Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov	Docket No. 185-5
H – Exhibit E to the Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov	Docket No. 186-6
I – Exhibit F to the Declaration of Luke C. Platzer in Support of Plaintiffs’ Motion to Compel the Deposition of Andrei Ianakov	Docket No. 185-7

Dated: December 22, 2011

Respectfully submitted,

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Attorneys for Plaintiffs

CERTIFICATE OF GOOD FAITH CONFERENCE

I HEREBY CERTIFY that, pursuant to Local Rule 7.1(a)(3), U.S. District Court for the Southern District of Florida, counsel for Plaintiffs have conferred with counsel for defendants Hotfile Corp. and Anton Titov in a good faith effort to resolve the issues raised in this Motion, and counsel for defendants has indicated that they do not oppose this Motion.

Dated: December 22, 2011

Respectfully submitted,

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd Day of December, 2011, I served the following documents on all counsel of record on the attached service list via the Court's CM/ECF filing system:

Plaintiffs' Motion to Substitute Newly Redacted Versions of Motion to Compel the Deposition of Andrei Ianakov in Place of Publicly Filed Versions

I further certify that I am admitted to the United States Court for the Southern District of Florida and certify that this certificate of Service was executed on this date.

By: /s/ Karen L. Stetson
Karen L. Stetson

SERVICE LIST

Disney Enterprises, Inc., et al. v. Hotfile Corp. et al. CASE NO. 11-CIV-20427-JORDAN

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