

ATTACHMENT D

EXHIBIT A

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA
3 CASE NO. 11-20427-WILLIAMS/TURNOFF

4 DISNEY ENTERPRISES,
5 INC., TWENTIETH CENTURY
6 FOX FILM CORPORATION,
7 UNIVERSAL CITY STUDIOS
8 PRODUCTIONS LLLP,
9 COLUMBIA PICTURES
10 INDUSTRIES, INC., and
11 WARNER BROS.
12 ENTERTAINMENT, INC.,

13 Plaintiff,

14 v.

15 HOTFILE CORP., ANTON
16 TITOV, and DOES 1-10,

17 Defendants.

18 HOTFILE CORP.,
19 Counterclaimant,

20 v.

21 WARNER BROS ENTERTAINMENT
22 INC.,

23 Counterdefendant.
24

25 -----
VOLUME I

26 H I G H L Y C O N F I D E N T I A L
27 (Pursuant to protective order, the following
28 transcript has been designated highly confidential)

29 30(b)(6) DEPOSITION OF ANTON TITOV

30 Radisson Blu Hotel

31 Sofia, Bulgaria

32 Monday, December 5, 2011

33 Job Number: 44174

1 [REDACTED]

2 A. General operations would be -- begin once the site
3 starts operating. Everything else before that is
4 development, in my understanding.

5 Q. Okay.

6 A. Do you agree?

7 Q. That's fair enough.

8 A. So, from the beginning or almost from the beginning,
9 Andre Ianakov would be responsible for communications
10 with users, and handling DMCA takedown notices.

11 Q. Is Mr. Ianakov a manager?

12 MR. THOMPSON: Objection, vague. Calls for a legal
13 conclusion.

14 BY MR. FABRIZIO:

15 Q. Let me ask it this way: Does Mr. Ianakov have a title
16 at Hotfile?

17 A. I don't think anybody at Hotfile really has a title.

18 Q. Is Mr. Ianakov employed by Hotfile Corporation?

19 A. He's employed by [REDACTED] but works -- he does
20 work for Hotfile Corporation, yes.

21 Q. To your knowledge, does he perform work for any other
22 company?

23 A. I am not aware of any.

24 Q. And you said communicates with users and DMCA takedown
25 notices. Does Mr. Ianakov have any other general

1 operations responsibilities?

2 A. I don't think anything else would be -- could be defined
3 as his responsibility.

4 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16 Q. When did Mr. [REDACTED] assume responsibilities for general
17 operations?

18 A. He started helping Andre Ianakov in spring 2010,
19 I believe.

20 Q. So prior to spring of 2010, it was just Mr. Ianakov
21 handling operations?

22 A. I'm not sure of what your definition of "operations" is.
23 He was handling communications with users and, again,
24 DMCA takedown notices.

25 Q. Did Mr. Ianakov report to anybody else?

1 MR. THOMPSON: Objection, vague.

2 A. I don't think he -- we have strictly defined reporting
3 structure, but it is my impression that he would
4 normally report to [REDACTED]. And of course
5 technical problems would be reported to me.

6 BY MR. FABRIZIO:

7 Q. Professionally, you were Mr. Ianakov's superior?

8 MR. THOMPSON: Objection, vague and ambiguous.

9 A. I consider myself superior to Mr. Ianakov.

10 BY MR. FABRIZIO:

11 Q. If you gave him instructions about things to do with
12 Hotfile, you would expect him to carry them out because
13 you told him to, correct?

14 MR. THOMPSON: Objection, overbroad.

15 A. I would expect so. But to the extent if he thinks that
16 instruction I'm giving him he's considering unimportant,
17 he show choice, he would probably ask if I conferred
18 with [REDACTED] and probably [REDACTED].

19 BY MR. FABRIZIO:

20 Q. Okay. Other than Mr. Ianakov and eventually Mr. [REDACTED],
21 has anybody else worked on the general operations of
22 Hotfile?

23 MR. THOMPSON: Objection, vague.

24 A. It really depends what you -- how you define "general
25 operations."

1 BY MR. FABRIZIO:

2 Q. Well, how do you define "general operations"?

3 A. This is my first time defining general operations, but
4 I would say things that had to be done day to day.

5 Q. All right. With that definition, other than Mr. Ianakov
6 and [REDACTED], was there anybody else?

7 A. To the extent that Hotfile servers require and required
8 maintenance, and that we would be needing off on
9 provisioning of new servers at first, I was dealing with
10 these tasks. And since [REDACTED] started working for
11 Hotfile Corp., and the more he -- he started performing
12 most of the these duties.

[REDACTED]