

# ATTACHMENT F

# EXHIBIT C

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 III

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 Wednesday, December 7, 2011

33 AT: 9:09 a.m.

34 Job # 44429



1 A. I won't say it's fair to say that I do supervise them.  
2 To the extent that a user may have a technical problem,  
3 they may contact me, if they think that it's a problem  
4 I can help them with.

5 BY MR. FABRIZIO:

6 Q. Okay. Does somebody have a responsibility for  
7 supervising Mr. [REDACTED] and Ianakov in responding to user  
8 communications?

9 MR. THOMPSON: Same objection.

10 A. Well, it's not strictly written anywhere or anything  
11 else, and my understanding is that, to a certain extent,  
12 [REDACTED] is supervising them.

13 BY MR. FABRIZIO:

14 Q. Well, maybe I should put it this way; while he was there  
15 Mr. [REDACTED] and throughout the period, Mr. Ianakov, were  
16 they empowered by Hotfile to exercise their discretion  
17 in answering user correspondence?

18 MR. THOMPSON: Objection. Vague and calls for a legal  
19 conclusion.

20 A. I would say to a certain extent.

21 BY MR. FABRIZIO:

22 Q. "To a certain extent"? What does that mean?

23 MR. THOMPSON: Objection, vague.

24 A. Probably there would be problems that they will address  
25 to [REDACTED] or to me, and if they want me to tell them how

1 to solve this problem, they would generally get the idea  
2 that this is the way that these problems should be  
3 solved.

4 BY MR. FABRIZIO:

5 Q. Okay. How is it determined which problems they bring to  
6 you or Mr. -- let me just get his name.

7 MR. THOMPSON: [REDACTED]

8 MR. FABRIZIO: [REDACTED]

9 MR. THOMPSON: [REDACTED]

10 BY MR. FABRIZIO:

11 Q. [REDACTED] Let me repeat that. How does -- how do they  
12 -- strike that.

13 How is Mr. Ianakov supposed to determine which  
14 problems he brings to you or Mr. [REDACTED]?

15 MR. THOMPSON: Objection, lacks foundation, calls for  
16 speculation.

17 A. I don't know how he decides.

18 BY MR. FABRIZIO:

19 Q. Okay. So he uses his discretion to decide this?

20 A. I will help him to solve the problem, I guess.

21 Q. If a user communication and comes in and Mr. Ianakov and  
22 Mr. [REDACTED] believe that they can respond to it without --  
23 because it doesn't create a problem, are they allowed to  
24 respond to it without somebody else from Hotfile  
25 reviewing it?







1 A. I'm not sure about "single," but generally, yes.

2 Q. Okay. And maybe more than one mailbox?

3 A. Yeah, there might be.

4 Q. What gmail accounts are used to receive communications  
5 from users through the Contact us page?

6 A. I believe one is hotfile.general.

7 Q. @gmail.com?

8 A. Yes.

9 Q. Are there others that are used to receive Contact us  
10 page communications from users?

11 A. I think there is one called hotfile.mailbox. I don't  
12 know them all. There might be more.

13 Q. Okay. And is Mr. Ianakov responsible for reviewing all  
14 of those mailboxes?

15 A. Yes, he is.

16 Q. Okay. Have you ever yourself gone into those gmail  
17 accounts and reviewed user communications?

18 MR. THOMPSON: Objection, overbroad and vague.

19 A. Yeah, I think so.

█ [REDACTED]

█ █ [REDACTED]

█ [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

4 Q. Okay. And look at exhibit 146, please.

5 A. Yes.

6 Q. This user says that they're no longer able to download  
7 TV serial -- strike that.

8 The user says that he is no longer able to download  
9 TV series and then says:

10 "If you no longer support this feature, then I would  
11 like a refund as your service is of no use as it cannot  
12 be accessed."

13 Do you see that?

14 A. I do see that.

15 Q. Was this user a premium subscriber?

16 A. From what it says in the email, yes, he was.

17 Q. Okay. And the email reflects that this user last  
18 visited a page concerning Two and a Half Men?

19 MR. THOMPSON: Objection, the document speaks for itself,  
20 and misstates its content.

21 A. Yes, there is a URL with Two and a Half Men in the  
22 subject.

23 BY MR. FABRIZIO:

24 Q. And, to your knowledge, did Hotfile respond to this  
25 user?





1 BY MR. FABRIZIO:

2 Q. But in the beginning he did?

3 A. I believe so.

4 Q. Okay. And you knew he was doing it at the beginning?

5 A. I think so.

6 Q. And you approved of him doing it at the beginning?

7 A. I guess I didn't say anything, so ...

8 Q. You understood he was trying to help Hotfile become more  
9 well-known and gain users, correct?

10 A. I think it was my understanding, yes.

11 Q. So you considered his activities good for Hotfile?

12 MR. THOMPSON: Objection, vague.

13 A. I don't know about all his activities but, generally,  
14 yes.

15 BY MR. FABRIZIO:

16 Q. Do you know any of the forums on which Mr. Ianakov  
17 promoted Hotfile?

18 MR. THOMPSON: Objection, assumes facts.

19 A. Nothing that I can remember now, they were in  
20 interrogatory response.

■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]