

ATTACHMENT G

EXHIBIT D

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 -----

VOLUME IV

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

30(b)(6) DEPOSITION OF ANTON TITOV

Radisson Blu Hotel

Sofia, Bulgaria

Thursday, December 8, 2011

Job #44430

AT: 9:10 a.m.

█ [REDACTED]

█ [REDACTED]

3 Q. Does Hotfile have a Twitter account?

4 A. I believe so.

5 Q. Okay. What's the Twitter account name? What's the
6 handle?

7 Maybe I can help you, it's not a memory game. Is it
8 "hotfile_site"?

9 A. Maybe. I can't remember.

10 Q. And who tweets through that Hotfile Twitter account?

11 MR. THOMPSON: Objection, vague.

12 MR. FABRIZIO: Maybe to you, but undoubtedly not to him.

13 A. That would be Mr. Ianakov.

14 BY MR. FABRIZIO:

15 Q. Anybody else?

16 A. I don't believe so.

17 Q. Okay. And is he -- is that part of -- is that something
18 he's permitted to do as part of his job responsibility
19 for Hotfile?

20 MR. THOMPSON: Objection, assumes facts.

21 A. I have impression that Mr. [REDACTED] allowed him to do
22 so, yes.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

[REDACTED]

10 Q. Oh. Oh, there we go. So this is a true and correct
11 copy of the Hotfile FAQ page as it appeared on the
12 Hotfile website in the July 2010 timeframe?

13 MR. THOMPSON: Objection, calls for a legal conclusion, and
14 I assume you mean excluding the court stamps and the
15 like?

16 MR. FABRIZIO: Yes.

17 A. I don't have any reasons to believe it is not.

18 BY MR. FABRIZIO:

19 Q. Okay. Are you aware that the -- strike that.
20 Did the FAQ page change between July of 2010
21 and February of 2011?

22 MR. THOMPSON: Objection, overbroad and vague.

23 A. I don't know.

24 BY MR. FABRIZIO:

25 Q. Okay. If you look at the third page of the exhibit,

1 it's the one in the upper right marked "Page 4 of 5"
2 there, under the question -- well, first of all, who
3 wrote the questions and answers to the Hotfile FAQ?

4 A. I believe it would be Andre Ianakov.

5 Q. Did you review them?

6 A. No, I did not.

7 Q. Okay. Did you have to approve them?

8 A. No.

9 Q. He was perfectly within his rights to write these and
10 put them up on the website?

11 MR. THOMPSON: Objection, vague and ambiguous, calls for
12 a legal conclusion.

13 A. You mean since he's the one who is responding to the
14 query in the email, he's really the person who would
15 know what frequently questions are in reality, so
16 I think he was being given this task.

[Redacted]