

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.
_____**REQUEST OF DEFENDANT/COUNTERCLAIMANT HOTFILE CORP.'S FOR
HEARING OR ORAL ARGUMENT ON WARNER BROS.
ENTERTAINMENT INC.'S MOTION TO COMPEL TITOV DEPOSITION EXHIBIT 27**

Pursuant to Local Rule 7.1(b), Defendant/Counterclaimant, Hotfile Corp. ("Hotfile") hereby respectfully requests that the Court conduct oral argument or a hearing on Plaintiff/Counterdefendant Warner Bros. Entertainment, Inc.'s ("Warner") Motion to Compel Titov Deposition Exhibit 27 ("Motion"). Hotfile believes that, given the apparent violations of

the Protective Order entered in this case [D.E. # 68] implicated by Warner's Motion, the Court would benefit by having oral argument on Warner's motion to be fully informed. Specifically, Hotfile would like the opportunity to further explain these serious issues and answer any questions the Court may have. As there is already a Status Conference on pending motions set for January 13, 2012 [D.E. # 189], Hotfile believes that the hearing on Warner's Motion could be conducted at that time. Hotfile suggests that fifteen minutes should be sufficient for the hearing or oral argument.

CERTIFICATE OF GOOD FAITH CONFERENCE

I hereby certify that Defendant/Counterclaimant's counsel conferred with all parties or non-parties who may be affected by the relief sought in this request, including Plaintiff/Counterdefendant's counsel, in a good faith effort to resolve the issues and Plaintiff/Counterdefendant's counsel did not respond in time for filing the request.

DATED: December 27, 2011

By: /s/ Roderick M. Thompson

DATED: December 27, 2011

By: /s/ Roderick M. Thompson
Roderick M. Thompson (admitted *pro hac vice*)
Email: rthompson@fbm.com
Andrew Leibnitz (admitted *pro hac vice*)
Email: aleibnitz@fbm.com
Anthony P. Schoenberg (admitted *pro hac vice*)
Email: tschoenberg@fbm.com
Deepak Gupta (admitted *pro hac vice*)
Email: dgupta@fbm.com
Janel Thamkul (admitted *pro hac vice*)
Email: jthamkul@fbm.com
FARELLA BRAUN + MARTEL LLP
235 Montgomery St.
San Francisco, CA 94104
Telephone: 415.954.4400
Telecopy: 415.954.4480

And

/s/ Janet T. Munn
Janet T. Munn, Fla. Bar No. 501281
Email: jmunn@rascoklock.com
Rasco Klock
283 Catalonia Avenue, Suite 200
Coral Gables, FL 33134
Telephone: 305.476.7101
Telecopy: 305.476.7102

And

s/Valentin Gurvits
Valentin Gurvits (Admitted *pro hac vice*)
Email: vgurvits@bostonlawgroup.com
BOSTON LAW GROUP
825 Beacon Street, Suite 20
Newton Center, MA 02459
Telephone: 617.928.1800
Telecopy: 617.928.1802

*Counsel for Defendants Hotfile Corporation
and Anton Titov*

CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2011, the foregoing document was served on all counsel of record or pro se parties identified below either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/Janet T. Munn
Janet T. Munn

Karen L. Stetson, Fla. Bar No.: 742937
GRAY-ROBINSON, P.A.
Email: Karen.Stetson@gray-robinson.com
1211 Brickell Avenue
Suite 1600
Miami, FL 33131
Telephone: 305.416.6880
Telecopy: 305.416.6887

Karen R. Thorland, Esq. (*Pro Hac Vice*)
Senior Content Protection Counsel
Email: Karen_Thorland@mpaa.org
Motion Picture Association of America, Inc.
15301 Ventura Boulevard Building E
Sherman Oaks, CA
Telephone: 818.935.5812

Steven B. Fabrizio (*Pro Hac Vice*)
Email: sfabrizio@jenner.com
Duane C. Pozza (*Pro Hac Vice*)
Email: dpozza@jenner.com
Luke C. Platzer (*Pro Hac Vice*)
Email: lplatzer@jenner.com
JENNER AND BLOCK, LLP
1099 New York Ave, N.W.
Suite 900
Washington, DC 20001
Telephone: 202.639.6000
Telecopy: 202.639.6066