

EXHIBIT “A”

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.,
Plaintiff,

v.

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

Defendants.

HOTFILE CORP.,
Counterclaimant,

v.

WARNER BROS ENTERTAINMENT
INC.,
Counterdefendant.

VOLUME III
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
Wednesday, December 7, 2011
AT: 9:09 a.m.

Job # 44429

REDACTED

18 BY MR. FABRIZIO:

19 Q. Okay. Currently you said Hotfile uses a source code
20 version control system?

21 A. Yes, it does.

22 Q. What source code version control system does Hotfile
23 currently use?

24 A. I believe it's Subversion.

25 Q. When did Hotfile begin using Subversion?

1 A. When plaintiffs indicated to our counsel that we should
2 start.

3 Q. The plaintiffs in this action?

4 A. Yes, correct.

5 Q. So it was only after the filing of this lawsuit that you
6 began using Subversion?

7 A. Yes, that's correct.

8 Q. Did Hotfile use any version control system prior to
9 that?

10 A. I don't believe so.

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6 MR. FABRIZIO: Okay. Again, Rod, there are two instances
7 now where dates have become important and apparently the
8 only possibility of having a definitive determination of
9 the date is a -- is a review of source code versions
10 that may or may not exist.

11 Can I ask that Hotfile make a -- an inquiry or
12 an investigation as to whether the relevant source code
13 versions do exist, and, if so, at a minimum, have
14 Mr. Titov prepare to look at it and see if that can
15 refresh his memory, or give him an indication of these
16 dates that we've been discussing.

17 MR. THOMPSON: We'll take your request under advisement.

18 I can only say that Mr. Titov has now testified for
19 three days and we've given you an extraordinary amount
20 of information already, including a special
21 videoconference so you and your colleague on Skype here
22 could have asked all the questions you wanted to ask
23 early on, but, again, I'll take your request under
24 advisement.

25 MR. FABRIZIO: All right.