

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.*

/

**DEFENDANTS' UNOPPOSED MOTION TO UNSEAL THE RECORDING  
OF THE HEARING HELD BEFORE UNITED STATES MAGISTRATE JUDGE  
WILLIAM C. TURNOFF ON JANUARY 13, 2012 AND TO PERMIT  
TRANSCRIPTION OF A WRITTEN TRANSCRIPT**

Defendants Hotfile Corp. and Anton Titov ("Defendants"), move for an order of this Court to unseal the transcript of the hearing held before United States Magistrate Judge William C. Turnoff on January 13, 2012 and to allow the U.S. District Court's court reporter to prepare a written transcript of the hearing.

1. On January 13, 2012, a status conference and hearing on various discovery motions was held before United States Magistrate Judge William C. Turnoff.
2. Counsel for Defendants has been informed by the court reporter's office that because some of the motions were filed under seal, Magistrate Judge Turnoff's chambers has

instructed the court reporter not to prepare a written transcript of the hearing without an order from the Court permitting such transcription.

3. Counsel for Defendants needs to review the written transcript of the hearing in order to evaluate whether Defendants should file objections to any of the rulings by the Court.

4. A proposed Order granting Defendants' unopposed motion to unseal the tapes for the purpose of permitting the court reporter to prepare a written transcript of the hearing is attached hereto as Exhibit "A".

**CONCLUSION**

On the basis of the foregoing, Defendants respectfully request that this Court grant Defendants' unopposed motion to unseal the recording of the hearing held on January 13, 2012, before United States Magistrate Judge William C. Turnoff, in order to allow the court reporter to transcribe the recording of the hearing and create a written transcript of the hearing.

**CERTIFICATE OF GOOD FAITH CONFERENCE**

I hereby certify that counsel for the movant, Janet T. Munn, Esq., conferred with all parties or non-parties who may be affected by the relief sought in this motion, including Plaintiffs' counsel, Karen Stetson, Esq., in a good faith effort to resolve the issues and Plaintiffs' counsel has advised that Plaintiffs do not oppose the motion.

/s/ Janet T. Munn  
Janet T. Munn

DATED: January 18, 2012

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 January 18, 2012, 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  
Motion Picture Association of America, Inc.  
15301 Ventura Boulevard Building E  
Sherman Oaks, CA  
Telephone: 818.935.5812  
Email: Karen\_Thorland@mpaa.org

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