

FILING FEE	
PAID	\$ 75.00
pro hac vice	14549
Steven M. Larimore, Clerk	

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 11-20427-JORDAN

FILED by <u>AL</u> D.C.
FEB 24 2011
STEVEN M. LARIMORE CLERK U. S. DIST. CT. S. D. of FLA. - MIAMI

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.

**AGREED MOTION OF N. ANDREW LEIBNITZ TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Special Rules Governing the Admission and Practice of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of N. Andrew Leibnitz of the law firm of Farella Braun & Martel LLP, 235 Montgomery Street, 17th Floor, San Francisco, California, 94104, Telephone No.: 415.954.4400; Telecopy No.: 415.954.4480, for purposes of appearance as co-counsel on behalf of Defendants, HOTFILE CORP and ANTON TITOV (“Defendants”), in the above-styled case only. In accordance with Rule 2B of the CM/ECF Administrative Procedures, the undersigned also moves to permit Mr. Leibnitz to receive electronic filings in this case. In support of the foregoing, the undersigned states as follows:

1. N. Andrew Leibnitz, Esquire, is not admitted to practice in the Southern District of Florida but is a member in good standing of the State Bar of California and is admitted in all courts in California, the United States District Courts for the Northern, Eastern, Central, and Southern Districts of California, the Ninth Circuit Court of Appeals, and the Federal Circuit Court of Appeals.

2. Movant, Janet T. Munn, Esquire, of the law firm of Rasco Klock, 283 Catalonia Avenue, Suite 200, Coral Gables, Florida 33134, Telephone No.: 305. 476.7101, is a member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida, maintains an office in this State for the practice of law, and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file all documents and things that may be filed electronically, and who shall be responsible for filing documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, N. Andrew Leibnitz, Esquire, has made payment of this Court's \$75 admission fee. A certification in accordance with Rule 4(b) is attached hereto as Exhibit "A." A certificate of good standing from the California Bar is attached as Exhibit "B."

4. N. Andrew Leibnitz, Esquire, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to him at the email address: aleibnitz@fbm.com.

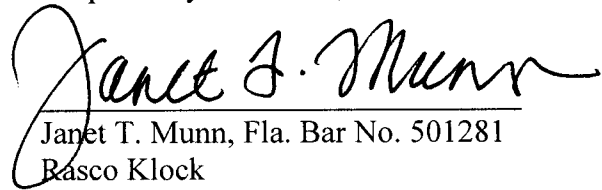
WHEREFORE, Janet T. Munn, Esquire, moves this Court to enter an Order allowing N. Andrew Leibnitz, Esquire, to appear before this Court on behalf of Defendants, HOTFILE CORP and ANTON TITOV, for all purposes relating to the proceedings in the above-styled matter, and directing the Clerk to provide notice of electronic filings to N. Andrew Leibnitz, Esquire at aleibnitz@fbm.com.

CERTIFICATE OF GOOD FAITH CONFERENCE

I hereby certify that Defendants' counsel conferred with all parties or non-parties who may be affected by the relief sought in this motion, including Plaintiffs' counsel, in a good faith effort to resolve the issues and Plaintiffs' counsel has agreed to the motion.

DATED: February 24, 2011

Respectfully submitted,



Janet T. Munn, Fla. Bar No. 501281

Rasco Klock

283 Catalonia Avenue, Suite 200

Coral Gables, FL 33134

Telephone: 305.476.7101

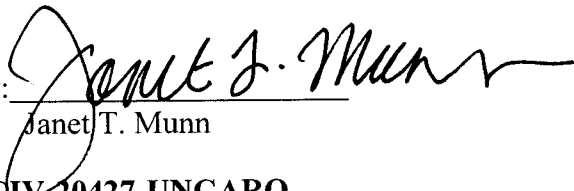
Telecopy: 305.476.7102

Email: jmunnn@rascoklock.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2011, I filed the foregoing document with the Clerk of the Court in the conventional manner. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified below in the manner specified, 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: 
Janet T. Munn

SERVICE LIST: CASE NO. 11-CIV-20427-UNGARO

GRAY-ROBINSON, P.A.

Karen L. Stetson, Fla. Bar No.: 742937
Email: Karen.Stetson@gray-robinson.com
1211 Brickell Avenue
Suite 1600
Miami, FL 33131
Phone: 305.416.6880
Fax: 305.416.6887

JENNER AND BLOCK, LLP

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
1099 New York Ave, N.W.
Suite 900
Washington, DC 20001
Phone: 202.639.6000
Fax: 202.639.6066

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 11-20427-JORDAN

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.

CERTIFICATION OF N. ANDREW LEIBNITZ

N. Andrew Leibnitz, Esquire, pursuant to Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys, hereby certifies that:

(1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; and

(2) I am a member in good standing of the California State Bar and am admitted in all courts in California, the United States District Courts for the Northern, Eastern, Central, and Southern Districts of California, the Ninth Circuit Court of Appeals, and the Federal Circuit Court of Appeals.

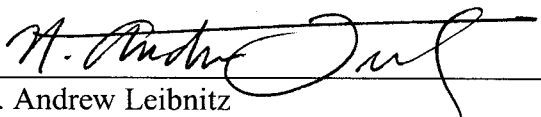

N. Andrew Leibnitz

EXHIBIT B



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

February 23, 2011

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, NOEL ANDREW LEIBNITZ, #184723 was admitted to the practice of law in this state by the Supreme Court of California on December 3, 1996; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert
Custodian of Membership Records

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 11-20427-JORDAN

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.

**ORDER GRANTING AGREED MOTION OF N. ANDREW LEIBNITZ TO APPEAR
PRO HAC VICE, CONSENT TO DESIGNATION AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

THIS CAUSE having come before the Court on the Agreed Motion to Appear *Pro Hac Vice* for N. Andrew Leibnitz, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing (the "Motion"), pursuant to the Special Rules Governing the Admission and Practice of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures. This Court having considered the motion and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED. N. Andrew Leibnitz may appear and participate in this action on behalf of Defendants, HOTFILE CORP. and ANTON TITOV. The Clerk shall provide

electronic notification of all electronic filings to N. Andrew Leibnitz, Esquire at email address:
aleibnitz@fbm.com.

DONE AND ORDERED in chambers in Miami, Florida this _____ day of February 2011.

ADALBERTO JORDAN
UNITED STATES DISTRICT JUDGE

Copy furnished to all Counsel of Record