

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

## CASE NO. 11-CIV-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.,

*Counter-Defendant.* /

**REQUEST OF DEFENDANT/COUNTERCLAIMANT  
HOTFILE CORPORATION FOR ORAL ARGUMENT  
ON THE MOTION OF PLAINTIFF/COUNTER-DEFENDANT  
WARNER BROS. ENTERTAINMENT INC. FOR  
SUMMARY JUDGMENT ON HOTFILE'S COUNTERCLAIM**

Pursuant to Local Rule 7.1(b), Defendant/Counterclaimant Hotfile Corporation (“Hotfile”), hereby respectfully requests that the Court conduct oral argument or hearing on the Motion of Plaintiff/Counter-Defendant Warner Bros. Entertainment Inc. (“Warner”), for Summary Judgment on Hotfile’s Counterclaim against Warner. This case and Warner’s summary judgment motion on Hotfile’s counterclaim, present a number of technical issues pertaining to the operation of the Hotfile.com site and Warner’s deletion of content from Hotfile

through use of a Special Rightsholder Account. Hotfile would like the opportunity to explain these important issues to the Court and for the Court to have an opportunity if it wishes to ask questions of the parties and believes that a hearing will be of benefit to the Court. Hotfile believes that 30 minutes should suffice for the hearing or oral argument on Warner's Motion for Summary Judgment on Hotfile's Counterclaim, if that is convenient to the Court's schedule.

**CERTIFICATE OF GOOD FAITH ATTEMPT TO RESOLVE**

I hereby certify that pursuant to Local Rule 7.1(a)(3), prior to filing this motion, counsel for Hotfile, Janet T. Munn, communicated with counsel for Warner, Steven B. Fabrizio, by e-mail and that Warner, while not agreeing that a hearing is necessary, will not oppose Hotfile's request for hearing or oral argument.

/s/ Janet T. Munn

Janet T. Munn, Esq.

DATED: February 27, 2012

Respectfully submitted,

/s/ Janet T. Munn

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*Counsel for Defendants Hotfile Corporation  
and Anton Titov*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 27, 2012, a true and correct copy of 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.

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By: /s/ Janet T. Munn  
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