

EXHIBIT G

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA
3 CASE NO. 11-20427-WILLIAMS/TURNOFF
4

5 DISNEY ENTERPRISES,)
6 INC., TWENTIETH CENTURY)
7 FOX FILM CORPORATION,)
8 UNIVERSAL CITY STUDIOS)
9 PRODUCTIONS LLLP,)
10 COLUMBIA PICTURES)
11 INDUSTRIES, INC., and)
12 WARNER BROS.)
13 ENTERTAINMENT, INC.,)
14)

15 Plaintiffs,)

16 v.)

17 HOTFILE CORP., ANTON)
18 TITOV, and DOES 1-10)
19)

20 Defendants.)
21)
22)
23)

24 H I G H L Y C O N F I D E N T I A L
25 (Pursuant to protective order, the following
transcript has been designated highly confidential)

30(B)(6) DEPOSITION OF ANTON TITOV
LOS ANGELES, CALIFORNIA
THURSDAY, NOVEMBER 17, 2011

26 REPORTED BY:
27 Alejandria E. Kate
28 CSR NO. 11897, HI 448, RPR, CLR
29 JOB NO.: 44003

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13 ENTERTAINMENT, INC.,)

14 Plaintiffs,)

15 v.)

16 HOTFILE CORP., ANTON)
17 TITOV, and DOES 1-10)

18 Defendants.)

19 _____)
20 HOTFILE CORP.,)

21 Counterclaimant,)

22 v.)

23 WARNER BROS ENTERTAINMENT)
24 INC.,)

25 Counterdefendant.)
_____)

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NOVEMBER 17, 2011

7:08 A.M.

Videotaped deposition of ANTON TITOV, held at
the offices of JENNER & BLOCK, LLP,
633 West 5th Street, Suite 3600, Los Angeles,
California, before Alejandria E. Kate, a
Registered Professional Reporter and
Certified Shorthand Reporter of the State of
California.

1 A P P E A R A N C E S :

2
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12 ATTORNEY FOR THE DEFENDANTS HOTFILE CORP.,
13 AND ANTON TITOV:

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22 ATTORNEY FOR THE DEFENDANT ANTON TITOV:

23 PENKOV, MARKOV & PARTNERS
24 BY: SVETOSLAV DIMITROV, ESQ.
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26 ALSO PRESENT:

27 KELLY TRUELOVE, consultant for the plaintiffs
28
29 GUEORGUI MATVEER, standby Bulgarian interpreter
30 (appearing via video conference)

1 the scope -- 08:45

2 (Speaking simultaneously.) 08:45

3 THE WITNESS: (Inaudible.) 08:45

4 BY MR. FABRIZIO: 08:45

5 Q. Go ahead, Mr. Titov. 08:45

6 MR. THOMPSON: Well, excuse me. Let make me 08:45

7 make my objection, Mr. Fabrizio. 08:45

8 This -- this last line of inquiries is outside 08:45

9 the scope of the deposition notice. We're coming up to 08:45

10 two hours, and you're going far afield. I'll let a few 08:45

11 more questions go before I cut this off. 08:45

12 MR. FABRIZIO: Okay. I understand. 08:45

13 Q. Mr. Titov? 08:45

14 MR. THOMPSON: Perhaps you can repeat the 08:45

15 question. 08:45

16 MR. FABRIZIO: I'm going to. 08:45

17 Q. Prior to this litigation, Mr. Titov, did 08:45

18 Hotfile assign strikes to users based on the criteria 08:45

19 you've identified, whether automatically or manually? 08:46

20 MR. THOMPSON: Objection. Vague. 08:46

21 THE WITNESS: It was not automatic counting of 08:46

22 strikes and manually, if there was something that was 08:46

23 subjective to somebody. 08:46

24 BY MR. FABRIZIO: 08:46

25 Q. Was there any place, any data field or location 08:46

1 where, prior to this litigation, Hotfile kept track of 08:46

2 how many strikes a user had? 08:46

3 A. Nothing that I'm aware of. 08:46

4 Q. In the normal course, prior to this litigation, 08:46

5 when Hotfile received a DMCA takedown notice, did 08:46

6 Hotfile identify the user who had uploaded the file 08:46

7 identified in that takedown notice? 08:47

8 MR. THOMPSON: Objection. Vague and ambiguous. 08:47

9 THE WITNESS: By "Hotfile," if you mean the 08:47

10 servers of Hotfile would -- who would process the 08:47

11 notice, I can't really speak of what it means for a 08:47

12 computer to identify something. 08:47

13 BY MR. FABRIZIO: 08:47

14 Q. Well, prior to this -- 08:47

15 A. For a person -- 08:47

16 (Speaking simultaneously.) 08:47

17 BY MR. FABRIZIO: 08:47

18 Q. I'm sorry. Please continue. 08:47

19 A. And for a person who would review a DMCA 08:47

20 notice, he might or may not go through the process of 08:48

21 identifying whose file it is. 08:48

22 Q. Prior to this litigation, did Hotfile have an 08:48

23 established policy that its personnel reviewing DMCA 08:48

24 takedown notices were supposed to identify the user who 08:48

25 had uploaded the noticed files? 08:48

1 MR. THOMPSON: Objection. Outside the scope of 08:48
2 the Rule 30(b)(6) deposition. Steve, you're asking a 08:48
3 lot of questions that are not here. 08:48

4 BY MR. FABRIZIO: 08:48

5 Q. Go ahead, Mr. Titov. 08:48

6 A. Not -- 08:48

7 Q. Go ahead, Mr. Titov. 08:48

8 (Speaking simultaneously.) 16:25

9 BY MR. FABRIZIO: 16:25

10 Q. Go ahead, Mr. Titov.

11 A. Not anything that I can -- that I can recall. 08:48

█ [REDACTED] [REDACTED] █

█ [REDACTED] █

█ [REDACTED] █

█ █ [REDACTED] █

█ [REDACTED] █

█ [REDACTED] █

█ [REDACTED] [REDACTED] [REDACTED] █

█ [REDACTED] [REDACTED] █

█ [REDACTED] █

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█ █ [REDACTED] [REDACTED] █

█ [REDACTED] █

█ [REDACTED] [REDACTED] █

1

ERRATA SHEET

2

3

NAME OF CASE: "DISNEY ENTERPRISES VS. HOTFILE CORP."

4

DATE OF DEPOSITION: NOVEMBER 17, 2011

5

NAME OF WITNESS: ANTON TITOV

6

Reason Codes:

7

1. To clarify the record.

2. To conform to the facts.

8

3. To correct transcription errors.

9

10

Page 6 Line 20-21 Reason 1

11

From which is the Daylight Saving Times,
with the Dallas time to with Daylight Saving Times

12

Page 9 Line 17 Reason 1

13

From a transaction ID schedule, to a transaction ID,

14

Page 15 Line 3-4 Reason 1

15

From for millions of years to for many years

16

Page 15 Line 4 Reason 1

17

From a user for-- to a user for short period

18

Page 16 Line 8 Reason 3

19

From Vazell to Vasil

20

Page 16 Line 20 Reason 3

21

From Vazell is Vazell Kolef to Vasil is Vasil Kolev

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Page 17 Line 6-7 Reason 2

23

From main file to admin panel

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 ANTON TITOV

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Reason Codes:

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Page 20 Line 13 Reason 3

From then we'll to that will

Page 21 Line 14 Reason 3

From wipe to whitelist

Page 26 Line 20 Reason 3

From Andre to Andrey

Page 33 Line 1 Reason 3

From bullet to uploaded

Page 33 Line 12 Reason 3

From my scale to ~~MySQL~~ MySQL

Page 33 Line 12 Reason 3

From our increments to auto increment

Page 34 Line 6 Reason 3

From of this to manual

ANTON TITOV

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Page 38 Line 15 Reason 3
 From match to mention

Page 39 Line 1 Reason 3
 From coordinate to concatenate

Page 40 Line 2 Reason 3
 From image indicator to identifier

Page 42 Line 4 Reason 3
 From false to uploads

Page 45 Line 7 Reason 3
 From bot to --

Page 46 Line 15 Reason 3
 From escrow to ~~SOL~~ SQL

Page 51 Line 3 Reason 3
 From 19 to 90

ANTON TITOV

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Page 52 Line 9 Reason 3

From pile to panel

Page 61 Line 11-12 Reason 3

From block...block to last...last

Page 62 Line 8-9 Reason 3

From late block...block downloads to last....uploaddownloads

Page 69 Line 3 Reason 3

From date to data

Page 72 Line 13 Reason 3

From mainly to many

Page _____ Line _____ Reason _____

From _____ to _____

Page _____ Line _____ Reason _____

From _____ to _____

ANTON TITOV