

EXHIBIT 17

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.

_____ /

HOTFILE CORP.,

Counterclaimant,

v.

WARNER BROS. ENTERTAINMENT INC.,

Counterdefendant.

_____ /

**PLAINTIFFS' RESPONSES AND OBJECTIONS TO DEFENDANT HOTFILE CORP.'S
THIRD SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26(e)(2) and 33, Plaintiffs Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, Universal City Studios Productions LLLP, Columbia Pictures Industries, Inc., Warner Bros. Entertainment Inc., and the Motion Pictures Association of America (collectively, "Plaintiffs") hereby provide the following Responses and Objections to Defendant Hotfile Corporation's ("Defendant" or "Hotfile") Third Set of Interrogatories (the "Third Interrogatories"):

information regarding Plaintiffs' investigation of infringing files on Hotfile.com. Plaintiffs further specifically object that this Interrogatory is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The timing of when Plaintiffs or their agents first became aware of any specific infringing file on the Hotfile website is not relevant to Defendants' liability for providing access to infringing content on the Hotfile Website, nor is it relevant to Defendants' purported affirmative defenses. Plaintiffs further object that the Interrogatory calls for attorney work product and information protected by the attorney-client privilege to the extent that it seeks information identifying Plaintiffs' investigation for purposes of this very action, or for purposes of other investigations of online infringement.

Plaintiffs further object that the Interrogatory is overbroad, unduly burdensome, and appears designed to harass. Plaintiffs have identified nearly a million files available through the Hotfile website that infringe Plaintiffs' copyrights; it would thus be unduly burdensome to identify on a file-by-file basis the specific time that Plaintiffs or their agents became aware of each of those files.

INTERROGATORY NO. 20:

IDENTIFY each file in Schedule A to THE STUDIOS' response to HOTFILE's Interrogatory No. 1 which THE STUDIOS contend Hotfile failed "expeditiously to remove, or disable access to" after receiving a DMCA takedown notice or SRA request. *See* 17 U.S.C. §512(c).

PLAINTIFFS' RESPONSE AND OBJECTIONS TO INTERROGATORY NO. 20:

Plaintiffs incorporate each General Objection and Specific Objection to Definitions as if set forth herein. Plaintiffs further specifically object to this Interrogatory as premature, as critical technical data regarding Hotfile's responses to takedown notices remains outstanding. Without waiver of and subject to and incorporating the specific objections as set forth above, Plaintiffs will supplement this response as appropriate upon the close of discovery.

Dated: December 1, 2011

By: s/ Luke C. Platzer
Luke C. Platzer

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st Day of December, 2011, I served the foregoing Plaintiffs' Responses and Objections to Defendant Hotfile Corp.'s Third Set of Interrogatories on all counsel of record on the attached Service List via their email address(es) as set forth on the Court's CM/ECF filing system per the parties' service agreement, as indicated on the attached Service List.

I further certify that I am admitted *pro hac vice* in the United States District Court for the Southern District of Florida and certify that this Certificate of Service was executed on this date at Washington, D.C.

/s/ Luke C. Platzer
Luke C. Platzer

SERVICE LIST

Disney Enterprises, Inc., et al. v. Hotfile Corp. et al. CASE NO. 11-CIV-20427-WILLIAMS-TURNOFF

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