

EXHIBIT 20

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

DISNEY ENTERPRISES, INC.,
TWENTIETH CENTURY FOX FILM
CORPORATION, UNIVERSAL CITY
STUDIOS PRODUCTIONS LLLP,
COLUMBIA PICTURES INDUSTRIES,
INC., and WARNER BROS.
ENTERTAINMENT INC.,

Plaintiffs,

vs. CASE NO. 11-20427-WILLIAMS-TURNOFF

HOTFILE CORP., ANTON TITOV,
and DOES 1-10,

Defendants.

AND RELATED CROSS-ACTION.

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
VIDEOTAPED DEPOSITION OF KEVIN M. SUH, ESQUIRE,
INDIVIDUALLY AND

PURSUANT TO FEDERAL RULE 30(b)(6)

Los Angeles, California

Tuesday, December 20, 2011

Reported by:
LORI SCINTA, RPR
CSR No. 4811

Job No. 178796

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

DISNEY ENTERPRISES, INC.,
TWENTIETH CENTURY FOX FILM
CORPORATION, UNIVERSAL CITY
STUDIOS PRODUCTIONS LLLP,
COLUMBIA PICTURES INDUSTRIES,
INC., and WARNER BROS.
ENTERTAINMENT INC.,

Plaintiffs,

vs. CASE NO. 11-20427-WILLIAMS-TURNOFF

HOTFILE CORP., ANTON TITOV,
and DOES 1-10,

Defendants.

AND RELATED CROSS-ACTION.

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Videotaped deposition of KEVIN M. SUH, ESQUIRE,
individually, and pursuant to Federal Rule 30(b)(6),
taken on behalf of Defendants and Counterclaimant
Hotfile Corp., at 633 West Fifth Street, Los Angeles,
California, beginning at 9:17 A.M. and ending at
6:03 P.M. on Tuesday, December 20, 2011, before
LORI SCINTA, RPR, Certified Shorthand Reporter No. 4811.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES:

For Plaintiffs:

JENNER & BLOCK LLP
BY: DUANE C. POZZA
Attorney at Law
1099 New York Avenue, NW, Suite 900
Washington, D.C. 20001-4412
202.639.6000
Email: dpozza@jenner.com

-- and --

MOTION PICTURE ASSOCIATION OF AMERICA, INC.
BY: KAREN R. THORLAND
Attorney at Law
15301 Ventura Boulevard, Building E
Sherman Oaks, California 91403
310.244.6946
Email: karen_thorland@mpaa.org

For Defendants and Counterclaimant Hotfile, Corp.:

FARELLA BRAUN + MARTEL LLP
BY: ANTHONY SCHOENBERG
Attorney at Law
235 Montgomery Street
San Francisco, California 94104
415.954.4400
Email: tschoenberg@fbm.com

Videographer:

VONYARN MASON
SARNOFF COURT REPORTERS
20 Corporate Park, Suite 350
Irvine, California 92606
877.955.3855

05:15 1 (MPAA Exhibit 13 was marked for
05:16 2 identification by the court reporter.)

05:16 3 BY MR. SCHOENBERG:

05:16 4 Q And I will represent to you that page -- it
05:16 5 says there were three pages to this exhibit.

05:16 6 Well, I can't say what -- what the third page
05:16 7 was, but the only part that I'm interested in is Page 2.

05:16 8 And so I'll just ask you if you recognize
05:16 9 Page 2 of this document.

05:16 10 A This is MPA Exhibit No. 13.

05:16 11 Page 2 appears to be a printout of the Vobile
05:16 12 website describing -- or exhibiting a press release in
05:16 13 connection with vCloud9.

05:16 14 Q And I'd like to direct your attention to the
05:17 15 middle of the press release. There's a quote attributed
05:17 16 to you.

05:17 17 Do you see that?

05:17 18 A Yes. Actually, if I would make one
05:17 19 clarification.

05:17 20 The footer of Exhibit 13 at the bottom notes
05:17 21 that this was printed out from prnewswire.com, spelled
05:17 22 p-r-n-e-w-s-w-i-r-e.com.

05:17 23 So just a point of correction. This isn't from
05:17 24 the Vobile website.

05:17 25 Q Okay. Thanks for that clarification.

05:17 1 Do you see the quote that's attributed to you
05:17 2 in the middle of the press release?

05:17 3 A Yes.

05:17 4 Q It says, "Vobile" -- "Vobile vCloud9
05:17 5 offers an important new tool for
05:17 6 website operators offering legitimate
05:17 7 cloud-based storage services to be
05:17 8 able to discover unauthorized content
05:17 9 online and ensure copyright
05:17 10 compliance, thereby protecting the
05:17 11 rights of content owners and the
05:17 12 creative community," unquote.

05:18 13 Did you either say or authorize that statement
05:18 14 to be attributed to you?

05:18 15 A I did authorize that statement to be attributed
05:18 16 to me.

05:18 17 Q And you agree that that's an accurate
05:18 18 statement?

05:18 19 A Yes.

05:18 20 Q Is there anything in this press release with
05:18 21 which you do not agree?

05:18 22 MR. POZZA: Objection. Ambiguous.

05:18 23 THE WITNESS: If I could just -- I'm sorry. Go
05:18 24 ahead.

05:18 25 MR. POZZA: No. That's all I have.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I, KEVIN M. SUH, ESQUIRE, do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

EXECUTED this 27th day of January,
2012, at Sherman Oaks, California.
(City) (State)



KEVIN M. SUH, ESQUIRE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:


That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were duly sworn; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the testimony given.

Further, that if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript [x] was [] was not requested.

I further certify I am neither financially interested in the action nor a relative or employee of any attorney or party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: 12/27/2011



LORI SCINTA, RPR
CSR No. 4811