EXHIBIT 7

Page 1

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,

vs.

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

Defendants.

AND RELATED CROSS-ACTION.

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER VIDEOTAPED DEPOSITION OF VICKI R. SOLMON, ESQUIRE

PURSUANT TO FEDERAL RULE 30(b)(6)

Los Angeles, California

Friday, December 9, 2011

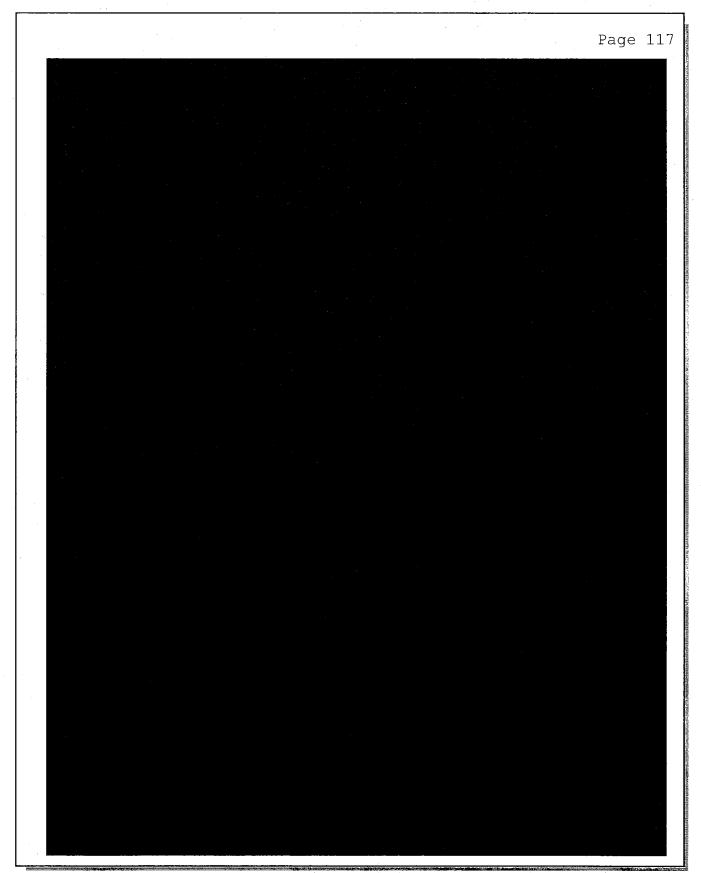
Volume 1

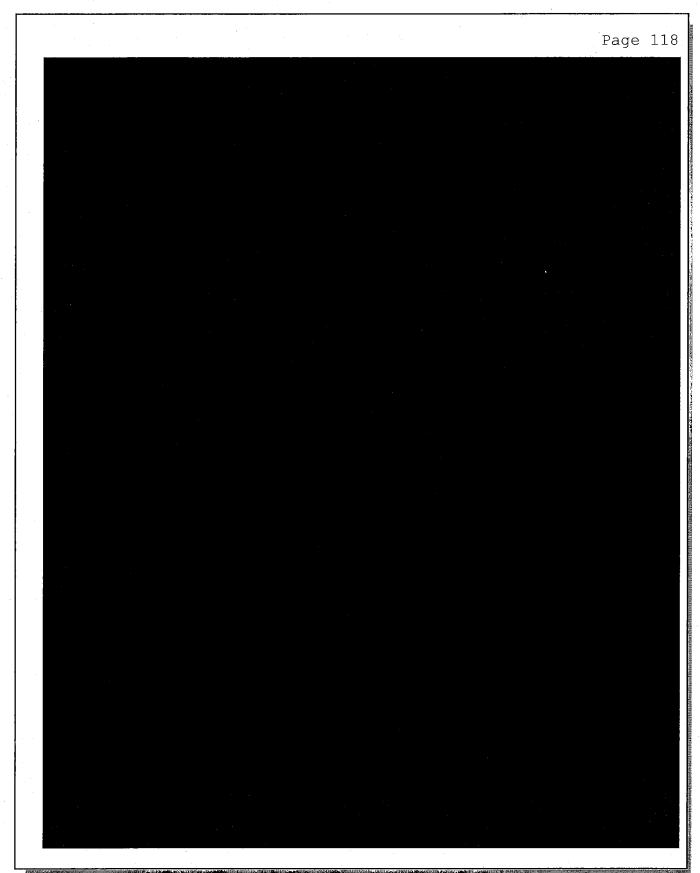
Reported by: LORI SCINTA, RPR CSR No. 4811

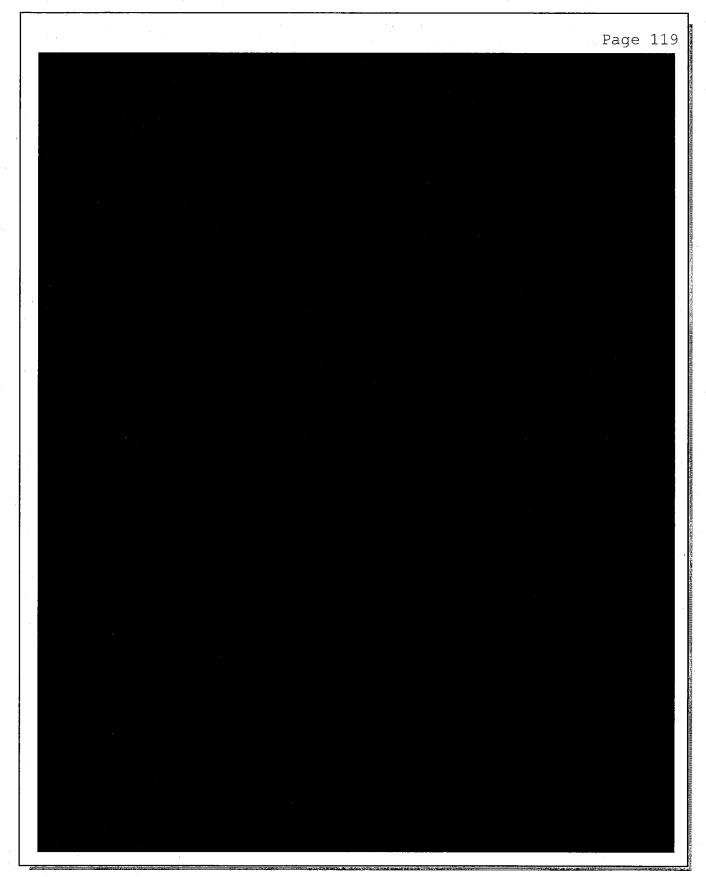
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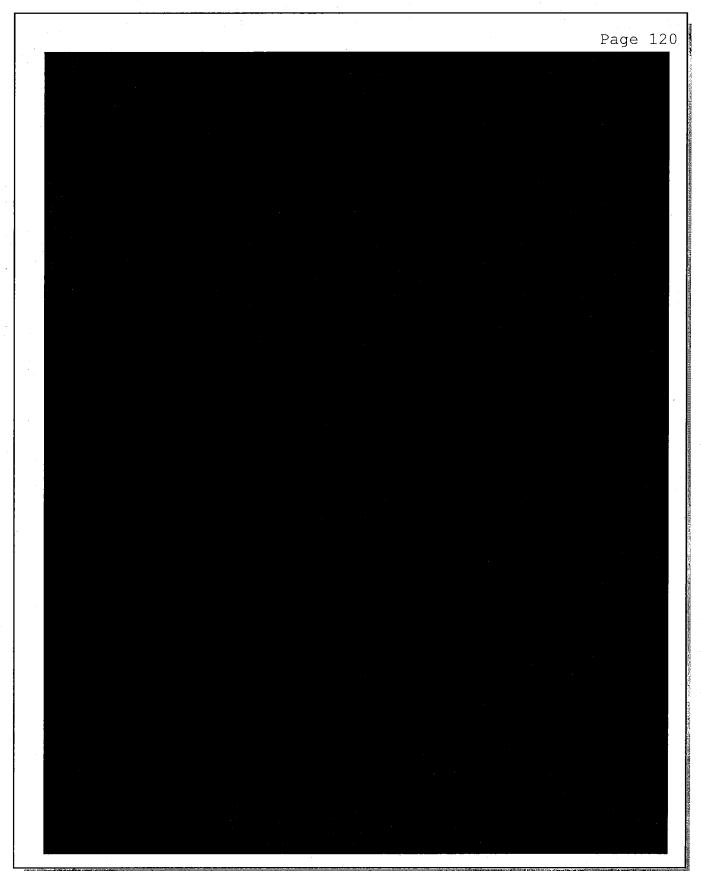
		Page 2
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	2	SOUTHERN DISTRICT OF FLORIDA
	. 3	CASE NO. 11-20427-WILLIAMS-TURNOFF
	4	DISNEY ENTERPRISES, INC., TWENTIETH CENTURY FOX FILM
	. 5	CORPORATION, UNIVERSAL CITY
	6	STUDIOS PRODUCTIONS LLLP, COLUMBIA PICTURES INDUSTRIES,
	7	INC., and WARNER BROS. ENTERTAINMENT INC.,
	8	Plaintiffs,
	9	vs.
	10	HOTFILE CORP., ANTON TITOV,
	11	and DOES 1-10,
	12	Defendants.
	13	AND RELATED CROSS-ACTION.
	14	
	15	HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
.*	16	Videotaped deposition of VICKI R. SOLMON,
	17	ESQUIRE, Volume 1, pursuant to Federal Rule 30(b)(6),
	18	taken on behalf of Defendants, at 633 West Fifth Street,
	19	Los Angeles, California, beginning at 9:53 A.M. and
	20	ending at 6:19 P.M. on Friday, December 9, 2011, before
•	21	LORI SCINTA, RPR, Certified Shorthand Reporter No. 4811.
	22	
	23	
	24	
	25	

	Page
1	APPEARANCES:
2	
3	For Plaintiffs:
4	
5	JENNER & BLOCK LLP BY: DUANE C. POZZA Attorney at Law
6	1099 New York Avenue, NW, Suite 900 Washington, D.C. 20001-4412
. 7	202.639.6000 Email: dpozza@jenner.com
8.	and
19.	
10	SONY PICTURES ENTERTAINMENT BY: MAGGIE HEIM
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13	Email: maggie_heim@spe.sony.com
14	
15	For Defendants:
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16	FARELLA BRAUN + MARTEL LLP BY: DEEPAK GUPTA
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18	San Francisco, California 94104 415.954.4400
19	Email: dgupta@fbm.com
20	
21	Videographer:
22	
23	VONYARN MASON SARNOFF COURT REPORTERS
24	20 Corporate Park, Suite 350 Irvine, California 92606 877.955.3855
25	011.933.3033

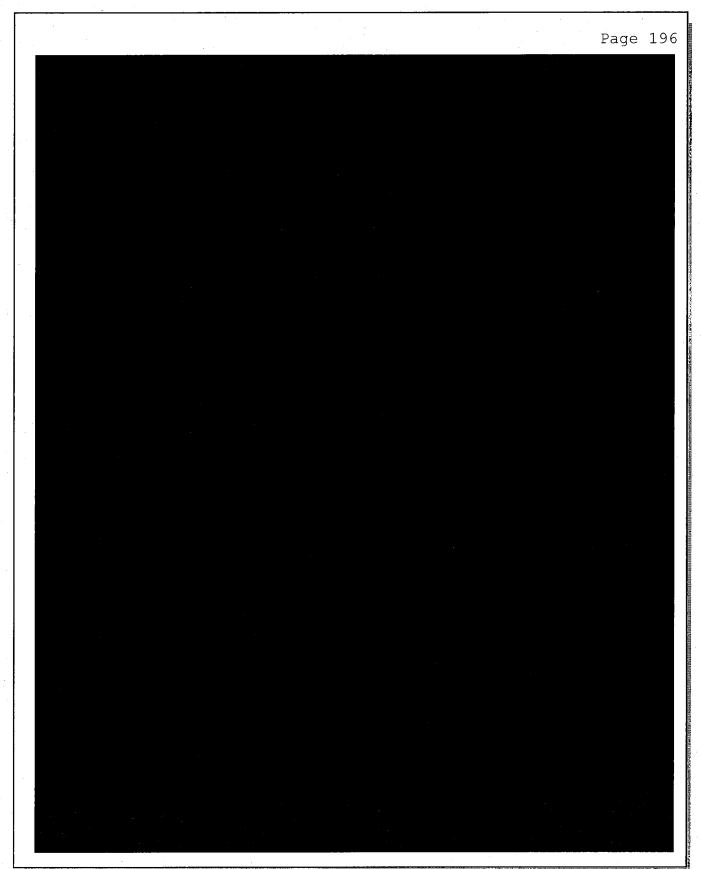


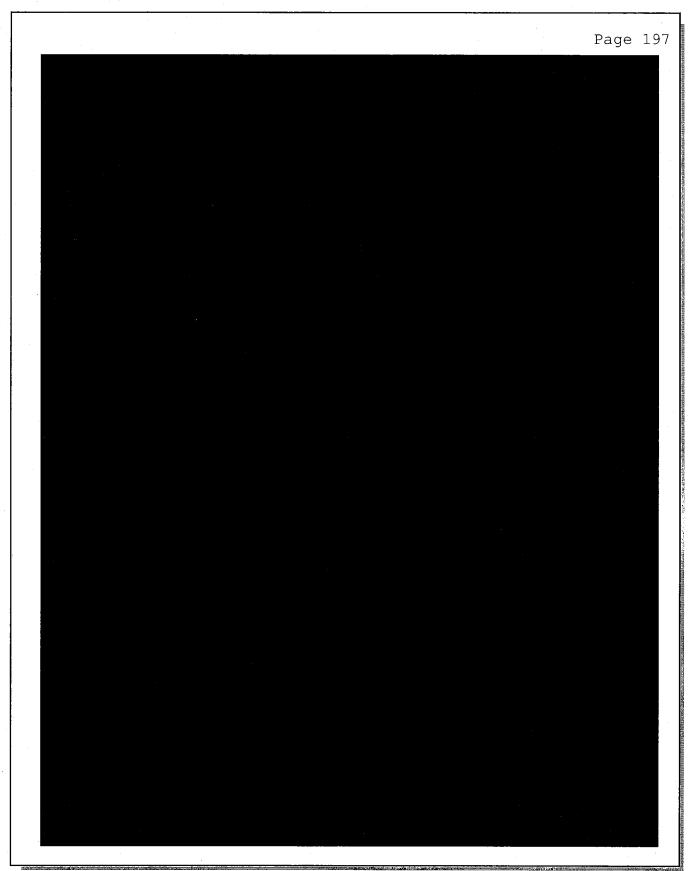






			Page 121
	02:33	1	Q And you have no reason to believe that it's not
	02:33	2	authentic, correct?
	02:33	3	A I have no reason.
	02:33	4	Q Isn't this document an example of Hotfile
•	02:33	5	reaching out to Columbia, trying to cooperate, offering
	02:33	6	a tool to assist Columbia in takedown notices?
	02:33	7	A No
	02:33	8	MR. POZZA: Objection. Vague and ambiguous.
	02:33	9.	BY MR. GUPTA:
	02:33	10	Q Please explain why.
	02:33	11	A I do not see where it is sent to Columbia.
	02:33	12	Q So your view is because it was sent to Sony
	02:33	13	Pictures Entertainment, it doesn't constitute an
	02:34	14	outreach to Columbia Pictures?
	02:34	15	Is that what you're saying?
	02:34	16	A I'm just answering your question as it was
	02:34	17	phrased, that I have no you're asking me to review
	02:34	18	from this document, and there is nothing on this
	02:34	19 .	document that indicates it was in connection with
	02:34	20	Columbia.
	02:34	21	And so I can't agree to your statement.
	02:34	22	Q At the time of this email, who was your
	02:34	23	employer?
	02:34	24	A You mean which entity?
	02:34	25	Q Correct.





VICKI R. SOLMON, ESQ: HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

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9	I, VICKI R. SOLMON, ESQUIRE, do hereby declare
10	under penalty of perjury that I have read the foregoing
11	transcript; that I have made any corrections as appear
12	noted, in ink, initialed by me, or attached hereto; that
13	my testimony as contained herein, as corrected, is true
14	and correct.
15	
16	
17	EXECUTED this 157 day of Harwary,
18	2012, at Los Angeles, Ca.
19	(City) (State)
20	
21	
	Ylute atomor
22	VICKI R. SOLMON, ESQUIRE
23	· Volume 1
7 = 1	
24	
24 25	

Errata Sheet Deposition of Vicki Solmon December 9, 2011 and December 23, 2011

Location	Correction
Day 1	
7:7	change "Hotfield" to "Hotfile"
17:15	change "ERA services" to "ARA Services"
21:15	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
21:17	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
21:20	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
21:21	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
22:19	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
24:14-15	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
24:16-17	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
31:11	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
31:14	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
32:2	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
35:18	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
47:21	change "Michelle Huynh" to "Michelle Wang"
47:22	change "Huynh" to "Wang"
58:25	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
71:1	change "Sony Pictures Entertainment, Inc." to "Sony Pictures Entertainment Inc."
81:10	change "A-Plex" to "Aiplex"
141:8	change "compiled each to" to "compelled each to"
Day 2	
231:16	change "question" to "answer"

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1	
2	I, the undersigned, a Certified Shorthand
3	Reporter of the State of California, do hereby certify:
4	That the foregoing proceedings were taken
5	before me at the time and place herein set forth; that
6	any witnesses in the foregoing proceedings, prior to
7	testifying, were duly sworn; that a record of the
8	proceedings was made by me using machine shorthand
. 9	which was thereafter transcribed under my direction;
10	that the foregoing transcript is a true record of the
11	testimony given.
12	Further, that if the foregoing pertains to
13	the original transcript of a deposition in a Federal
14.	Case, before completion of the proceedings, review of
15	the transcript [x] was [] was not requested.
16	I further certify I am neither financially
L·7	interested in the action nor a relative or employee
18	of any attorney or party to this action.
L 9	IN WITNESS WHEREOF, I have this date
20	subscriber Av no
21	
22	Dated: 12-12 17 17 17 17 17 17 17 17 17 17 17 17 17
23	
24	LORI SCINTA, RPR
25	CSR No. 4811