

# **Yeh Exhibit 69**



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Query	Activity
1 Onone Photoframe	
2 Shrek The Third	
3 Shrek 3	
4 Shrek	
5 http://hotfile.com/	
6 Hot Files	
7 Veronica Mars	
8 Hotfile Premium Account	
9 Hotfile	
10 Hot File	

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Alexa Search

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Free one-click file hosting!

Is this your site? Run an Alexa Site Audit

About Free one-click file hosting! (hotfile.com): Earn money while uploading and sharing your files with your friends.

Statistics Summary for hotfile.com

Hotfile.com has a three-month global Alexa traffic rank of 128. Compared with internet averages, the site appeals more to men; its visitors also tend to consist of low-income, childless Middle...

Show More

Alexa Traffic Rank

128 Global Rank

473 Rank in US

Reputation

20,080 Sites Linking In

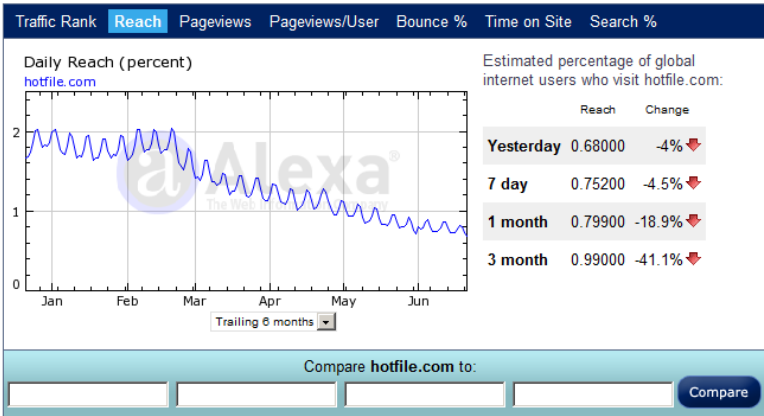
17 Reviews

High Impact Search Queries for Hotfile.com

Query	Impact
1 premium	High
2 link checker	High
3 hotfiles	High
4 هوت فايل	High
5 hotfile link checker	Medium
6 hotfile premium account	Medium
7 hotfile account	Medium

View the complete Search Analytics

Traffic Stats Search Analytics Audience Contact Info Reviews Related Links Clickstream



Learn more about Alexa Traffic Stats.

Share this: facebook Tweet

Average Load Time for Hotfile.com

Slow (2.059 Seconds), 69% of sites are faster.

Note: Slow sites may be penalized by search engines.

Hotfile.com's Regional Traffic Ranks

Country	Rank
Turkey	34
Sudan	34
Oman	37
Egypt	52
Saudi Arabia	55

Audience Snapshot

Based on internet averages, hotfile.com is visited more frequently by males who are in the age range 18-24 and browse this site from home.

Where Visitors Go on Hotfile.com

Subdomain	Percent of Site Traffic
hotfile.com	97.37%
abuse.hotfile.com	0.69%
admin.hotfile.com	0.10%
u12.hotfile.com	0.08%
u16.hotfile.com	0.08%

Top Search Queries for Hotfile.com

Query	Percent of Search Traffic
1 hotfile	17.42%

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Top Search Queries for Hotfile.com

Query	Percent of Search Traffic
1 hotfile	17.42%
2 hotfile premium	1.75%
3 hotfile.com	1.40%
4 hotfiles	0.62%
5 هوت فايل	0.61%
6 hotfile link checker	0.32%
7 hotfile premium account	0.22%

Get complete site demographics.

2	<a href="#">hotfile premium</a>	1.75%
3	<a href="#">hotfile.com</a>	1.40%
4	<a href="#">hotfiles</a>	0.62%
5	<a href="#">هوت فايل</a>	0.61%
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[View the complete Search Analytics](#)

[View the full Audience Profile](#)

[View the complete Search Analytics](#)



Wayback Machine  
See how Hotfile.com looked in the past

Like hotfile.com? Download the Alexa toolbar and access exclusive analytics content.

您现在可以在Alexa中文官方网站cn.alexa.com上获取hotfile.com的网站流量信息。

### Featured Alexa Site Tools



#### Site Audit

If you want to improve your SEO techniques, increase your organic search traffic, and ensure complete site analytics tag coverage, this tool is for you.



#### Toolbar Creator

Generate your own custom toolbar and promote it to your visitors to increase engagement and generate more frequent visits to your site.




#### Edit Your Listing

Update your listing on Alexa, including your site description, contact information, and more.



#### View All

Access all of Alexa's Site Tools.



Starting under \$25,400\*

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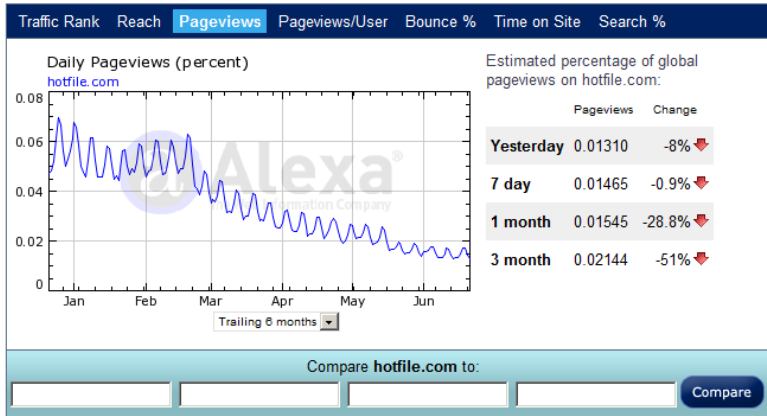
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Traffic Stats Search Analytics Audience Contact Info Reviews Related Links Clickstream



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[View the full Audience Profile](#)

[View the complete Search Analytics](#)



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Starting under \$25,400\*

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#### Company

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# **Yeh Exhibit 70**

**REDACTED**

# **Yeh Exhibit 71**



**REDACTED**

# **Yeh Exhibit 72**

**REDACTED**

# **Yeh Exhibit 73**

**REDACTED**

# **Yeh Exhibit 74**

1 JAMES M. CHADWICK, Cal. Bar No. 157114  
jchadwick@sheppardmullin.com  
2 GUYLYN R. CUMMINS, Cal. Bar No. 122445  
gcummins@sheppardmullin.com  
3 MICHELLE LAVOIE WISNIEWSKI, Cal. Bar No. 234032  
mwisniewski@sheppardmullin.com  
4 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
501 W. Broadway, 19th Floor  
5 San Diego, California 92101  
Telephone: 619-338-6500  
6 Facsimile: 619-234-3815

7  
8 Specially Appearing for Defendant,  
LEMURIA COMMUNICATIONS, INC.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

PERFECT 10, INC., a California corporation,

Plaintiff,

v.

HOTFILE CORP., a Panamanian corporation; HOTFILE, LLC, a Bulgarian limited liability company; ANTON TITOV, an individual; LEMURIA COMMUNICATIONS, INC., a Florida corporation; and DOES 1 through 100, inclusive,

Defendants.

Case No. 10-CV-2031 MMA  
*Hon. Michael M. Anello*

**DECLARATION OF ANTON TITOV  
IN SUPPORT OF LEMURIA  
COMMUNICATIONS INC.'S  
MOTION TO DISMISS**

*[Notice of Motion, Motion, Memorandum of Points and Authorities, and Request for Judicial Notice Filed Concurrently Herewith]*

Hearing:

Date: January 31, 2011

Time: 2:30 p.m.

Crtrm: 5

[Complaint Filed: September 20, 2010]

**DECLARATION OF ANTON TITOV**

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I, Anton Titov, declare as follows:

1. Appearing specially and without consenting to personal jurisdiction in this Court, I respectfully submit this declaration in support of the motion to dismiss by defendant Lemuria Communications, Inc. (“Lemuria”). I have personal knowledge of the facts stated in this declaration, and if called as a witness I could and would testify thereto.

2. I am a citizen of Russia who resides in Bulgaria.

3. I am the owner and manager of Lemuria. Lemuria is a Florida corporation with its only office located at 110 East Broward Boulevard, Suite 1736, Fort Lauderdale, Florida, 33301. A true and correct copy of Lemuria’s Certificate of Good Standing, certified by the Florida Secretary of State, is attached hereto as Exhibit “A.”

4. Lemuria has, at all time, maintained corporate formalities. It was duly incorporated in accordance with Florida law. It has regularly filed all necessary corporate documents with the Florida Secretary of State. It has appointed an agent for service of process in accordance with Florida law. It is adequately capitalized, *i.e.* it has and maintains funds adequate to pay for its operations and meet its obligations to creditors. It maintains financial accounts for use in its operations that are separate from the accounts of any other person or entity. I have never used Lemuria’s bank account or corporate funds for my own personal use.

5. I did not form Lemuria for the purpose of engaging in the business of illegal storing, displaying and distributing the intellectual property of others. On the contrary, Lemuria was formed for the purpose of providing web-hosting services, in particular for Hotfile.com. Lemuria has a contract with Hotfile, Ltd. to provide web hosting services for Hotfile.com. It receives payment for those services only.

6. Lemuria owns servers and network hardware, and contracts with a data-center operator to house, maintain, and provide connectivity for those servers. Lemuria also contracts with Internet access providers and others as need to provide web hosting



1 services. Lemuria's servers, which host Hotfile.com, are located in Dallas, Texas.  
2 Lemuria does not enlist the assistance of any California businesses, entities, or individuals  
3 in connection with its provision of services for Hotfile.com. Lemuria does not have its  
4 own website. Lemuria does not advertise in California or elsewhere.

5 7. Hotfile, Ltd. is a Bulgarian limited liability company with its only offices in  
6 Sofia, Bulgaria. Hotfile, Ltd. is owned by Hotfile Corp., a Panamanian corporation.

7 8. Hotfile.com is a file storage and sharing service that provides users the  
8 ability to upload files and generate personalized links through which those files can be  
9 accessed and shared. Its services are similar to file sharing services such as Google docs,  
10 Windows Live SkyDrive, and others. Lemuria does not own Hotfile.com, nor does any  
11 Hotfile entity own Lemuria.

12 9. Lemuria is not involved in the day-to-day operations of Hotfile.com.  
13 Lemuria is unable to discern the nature of content that is uploaded to or stored on  
14 Hotfile.com unless such content is specifically brought to its attention and it is provided  
15 with a URL related to that content. Lemuria lacks the ability to control content uploaded  
16 to or downloaded from Hotfile.com, beyond the ability to remove specific files in response  
17 to notice identifying those files and providing URLs. Lemuria has no control over where  
18 the Hotfile.com service is available.

19 10. Lemuria does not conduct any business in the State of California. Lemuria  
20 owns no real or personal property in California. It does not pay California income or  
21 property taxes. It has no California bank or deposit accounts. Lemuria does not sell any  
22 products or services to California residents or businesses. It does not transact any business  
23 in California. It does not have any officers, employees, agents or representatives in  
24 California, nor does it have any officers, employees, agents or representatives who have  
25 visited California in order to engage in business there.

26 11. Lemuria does not contract with any California entity to receive any goods or  
27 services. Lemuria does not sell monthly memberships to any services and does not sell  
28 any goods or services to California residents or solicit customers in California. Lemuria

1 does not receive any revenue from Paypal or from any California corporation, business  
2 entity, or individual. The only contact Lemuria ever had with California was its purchase  
3 of computer servers from a company located in Fremont, California.

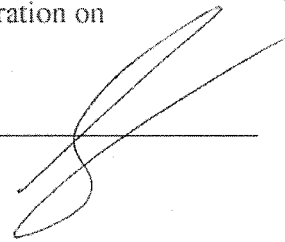
4 12. Prior to this litigation, Lemuria was unaware of Perfect 10's existence or its  
5 pornographic works.

6 I declare under penalty of perjury under the laws of the United States of America  
7 that the foregoing is true and correct, and that I executed this declaration on  
8 December 20, 2010 at Sofia, Bulgaria.

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ANTON TITOV



# **Yeh Exhibit 75**

**Electronic Articles of Incorporation  
For**

P09000085335  
FILED  
October 15, 2009  
Sec. Of State  
rdunlap

LEMURIA COMMUNICATIONS INC.

The undersigned incorporator, for the purpose of forming a Florida profit corporation, hereby adopts the following Articles of Incorporation:

**Article I**

The name of the corporation is:

LEMURIA COMMUNICATIONS INC.

**Article II**

The principal place of business address:

PROUCHVANE  
13D/22  
PERNIK, --. BG 2300

The mailing address of the corporation is:

PROUCHVANE  
13D/22  
PERNIK, --. BG 2300

**Article III**

The purpose for which this corporation is organized is:

ANY AND ALL LAWFUL BUSINESS.

**Article IV**

The number of shares the corporation is authorized to issue is:

1000

**Article V**

The name and Florida street address of the registered agent is:

INCORPORATE NOW INC.  
110 E. BROWARD BLVD.  
SUITE 1700  
FORT LAUDERDALE, FL. 33301

I certify that I am familiar with and accept the responsibilities of registered agent.

P09000085335  
FILED  
October 15, 2009  
Sec. Of State  
rdunlap

Registered Agent Signature: CONSTANTIN LUCHIAN

### **Article VI**

The name and address of the incorporator is:

CONSTANTIN LUCHIAN  
110 E. BROWARD BLVD.  
SUITE 1700  
FORT LAUDERDALE, FL 33301

Incorporator Signature: CONSTANTIN LUCHIAN

### **Article VII**

The initial officer(s) and/or director(s) of the corporation is/are:

Title: P  
ANTON TITOV  
PROUCHVANE 13D/22  
PERNIK, --. 2300 BG

### **Article VIII**

The effective date for this corporation shall be:

10/15/2009

# **Yeh Exhibit 76**

PO 900008535

(Requestor's Name)

(Address)

(Address)

(City/State/Zip/Phone #)

PICK-UP  WAIT  MAIL

(Business Entity Name)

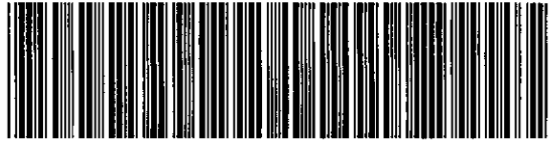
(Document Number)

Certified Copies \_\_\_\_\_ Certificates of Status \_\_\_\_\_

Special Instructions to Filing Officer:

Office Use Only

9.7.10



500184836495

09/03/10--01005--025 \*\*35.00

*Amend*

2010 SEP -3 AM 9:47  
SECRETARY OF STATE  
TALLAHASSEE, FLORIDA

FILED

COVER LETTER

**TO:** Amendment Section  
Division of Corporations

**NAME OF CORPORATION:** LEMURIA COMMUNICATIONS INC.

**DOCUMENT NUMBER:** P09000085335

The enclosed *Articles of Amendment* and fee are submitted for filing.

Please return all correspondence concerning this matter to the following:

Constantin Luchian  
Name of Contact Person

InCorporate Now Inc.  
Firm/ Company

1007 N. Federal Hwy., Suite 240  
Address

Fort Lauderdale, FL 33304  
City/ State and Zip Code

cl@incorporatenow.com  
E-mail address: (to be used for future annual report notification)

For further information concerning this matter, please call:

Constantin Luchian at ( 954 ) 773-8743  
Name of Contact Person Area Code & Daytime Telephone Number

Enclosed is a check for the following amount made payable to the Florida Department of State:

- \$35 Filing Fee
- \$43.75 Filing Fee & Certificate of Status
- \$43.75 Filing Fee & Certified Copy (Additional copy is enclosed)
- \$52.50 Filing Fee Certificate of Status Certified Copy (Additional Copy is enclosed)

**Mailing Address**  
Amendment Section  
Division of Corporations  
P.O. Box 6327  
Tallahassee, FL 32314

**Street Address**  
Amendment Section  
Division of Corporations  
Clifton Building  
2661 Executive Center Circle  
Tallahassee, FL 32301



Articles of Amendment  
to  
Articles of Incorporation  
of

LEMURIA COMMUNICATIONS INC.

(Name of Corporation as currently filed with the Florida Dept. of State)

P09000085335

(Document Number of Corporation (if known))

Pursuant to the provisions of section 607.1006, Florida Statutes, this Florida Profit Corporation adopts the following amendment(s) to its Articles of Incorporation:

FILED  
2010 SEP - 2 AM 9:47  
SECRETARY OF STATE  
TALLAHASSEE, FLORIDA

A. If amending name, enter the new name of the corporation:

The new name must be distinguishable and contain the word "corporation," "company," or "incorporated" or the abbreviation "Corp.," "Inc.," or "Co.," or the designation "Corp.," "Inc.," or "Co.". A professional corporation name must contain the word "chartered," "professional association," or the abbreviation "P.A."

B. Enter new principal office address, if applicable:  
(Principal office address **MUST BE A STREET ADDRESS**)

110 East Broward Blvd.  
Suite 1736  
Fort Lauderdale, FL 33301

C. Enter new mailing address, if applicable:  
(Mailing address **MAY BE A POST OFFICE BOX**)

110 East Broward Blvd.  
Suite 1736  
Fort Lauderdale, FL 33301

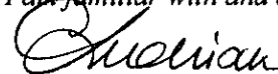
D. If amending the registered agent and/or registered office address in Florida, enter the name of the new registered agent and/or the new registered office address:

Name of New Registered Agent: InCorporate Now Inc.

New Registered Office Address: 1007 N. Federal Hwy., Suite 240  
(Florida street address)  
Fort Lauderdale, FL \_\_\_\_\_, Florida 33304  
(City) (Zip Code)

New Registered Agent's Signature, if changing Registered Agent:

I hereby accept the appointment as registered agent. I am familiar with and accept the obligations of the position.

  
Signature of New Registered Agent, if changing

**If amending the Officers and/or Directors, enter the title and name of each officer/director being removed and title, name, and address of each Officer and/or Director being added:**

*(Attach additional sheets, if necessary)*

<u>Title</u>	<u>Name</u>	<u>Address</u>	<u>Type of Action</u>
_____	_____	_____	<input type="checkbox"/> Add
		_____	<input type="checkbox"/> Remove
		_____	
_____	_____	_____	<input type="checkbox"/> Add
		_____	<input type="checkbox"/> Remove
		_____	
_____	_____	_____	<input type="checkbox"/> Add
		_____	<input type="checkbox"/> Remove
		_____	

**E. If amending or adding additional Articles, enter change(s) here:**

*(attach additional sheets, if necessary). (Be specific)*

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**F. If an amendment provides for an exchange, reclassification, or cancellation of issued shares, provisions for implementing the amendment if not contained in the amendment itself:**

*(if not applicable, indicate N/A)*

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The date of each amendment(s) adoption: 8/31/2010 (date of adoption is required)  
Effective date if applicable: 8/31/2010  
(no more than 90 days after amendment file date)

Adoption of Amendment(s) (CHECK ONE)

The amendment(s) was/were adopted by the shareholders. The number of votes cast for the amendment(s) by the shareholders was/were sufficient for approval.

The amendment(s) was/were approved by the shareholders through voting groups. The following statement must be separately provided for each voting group entitled to vote separately on the amendment(s):

“The number of votes cast for the amendment(s) was/were sufficient for approval  
by \_\_\_\_\_.”  
(voting group)

The amendment(s) was/were adopted by the board of directors without shareholder action and shareholder action was not required.

The amendment(s) was/were adopted by the incorporators without shareholder action and shareholder action was not required.

Dated 8/31/2010

Signature \_\_\_\_\_  
(By a director, president or other officer – if directors or officers have not been selected, by an incorporator – if in the hands of a receiver, trustee, or other court appointed fiduciary by that fiduciary)

Anton Titov  
(Typed or printed name of person signing)

President  
(Title of person signing)

# **Yeh Exhibit 77**

1 JAMES M. CHADWICK, Cal. Bar No. 157114  
 jchadwick@sheppardmullin.com  
 2 GUYLYN R. CUMMINS, Cal. Bar No. 122445  
 gcummins@sheppardmullin.com  
 3 MICHELLE LAVOIE WISNIEWSKI, Cal. Bar No. 234032  
 mwisniewski@sheppardmullin.com  
 4 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
 501 W. Broadway, 19th Floor  
 5 San Diego, California 92101  
 Telephone: 619-338-6500  
 6 Facsimile: 619-234-3815

7  
 8 Specially Appearing for Defendant,  
 LEMURIA COMMUNICATIONS, INC.

9  
 10 UNITED STATES DISTRICT COURT  
 11 SOUTHERN DISTRICT OF CALIFORNIA

13 PERFECT 10, INC., a California  
 corporation,

14 Plaintiff,

15 v.

16 HOTFILE CORP., a Panamanian  
 17 corporation; HOTFILE, LLC, a Bulgarian  
 limited liability company; ANTON  
 18 TITOV, an individual; LEMURIA  
 COMMUNICATIONS, INC., a Florida  
 19 corporation; and DOES 1 through 100,  
 inclusive,

20 Defendants.

Case No. 10-CV-2031 MMA  
 Hon. Michael M. Anello

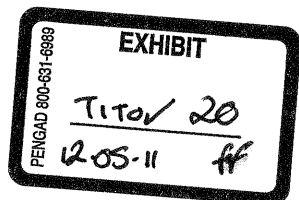
**DECLARATION OF ANTON TITOV  
 IN SUPPORT OF LEMURIA  
 COMMUNICATIONS INC.'S  
 MOTION TO DISMISS**

*[Notice of Motion, Motion, Memorandum  
 of Points and Authorities, and Request for  
 Judicial Notice Filed Concurrently  
 Herewith]*

Hearing:

Date: January 31, 2011  
 Time: 2:30 p.m.  
 Crtrm: 5

[Complaint Filed: September 20, 2010]





1 services. Lemuria's servers, which host Hotfile.com, are located in Dallas, Texas.  
2 Lemuria does not enlist the assistance of any California businesses, entities, or individuals  
3 in connection with its provision of services for Hotfile.com. Lemuria does not have its  
4 own website. Lemuria does not advertise in California or elsewhere.

5 7. Hotfile, Ltd. is a Bulgarian limited liability company with its only offices in  
6 Sofia, Bulgaria. Hotfile, Ltd. is owned by Hotfile Corp., a Panamanian corporation.

7 8. Hotfile.com is a file storage and sharing service that provides users the  
8 ability to upload files and generate personalized links through which those files can be  
9 accessed and shared. Its services are similar to file sharing services such as Google docs,  
10 Windows Live SkyDrive, and others. Lemuria does not own Hotfile.com, nor does any  
11 Hotfile entity own Lemuria.

12 9. Lemuria is not involved in the day-to-day operations of Hotfile.com.  
13 Lemuria is unable to discern the nature of content that is uploaded to or stored on  
14 Hotfile.com unless such content is specifically brought to its attention and it is provided  
15 with a URL related to that content. Lemuria lacks the ability to control content uploaded  
16 to or downloaded from Hotfile.com, beyond the ability to remove specific files in response  
17 to notice identifying those files and providing URLs. Lemuria has no control over where  
18 the Hotfile.com service is available.

19 10. Lemuria does not conduct any business in the State of California. Lemuria  
20 owns no real or personal property in California. It does not pay California income or  
21 property taxes. It has no California bank or deposit accounts. Lemuria does not sell any  
22 products or services to California residents or businesses. It does not transact any business  
23 in California. It does not have any officers, employees, agents or representatives in  
24 California, nor does it have any officers, employees, agents or representatives who have  
25 visited California in order to engage in business there.

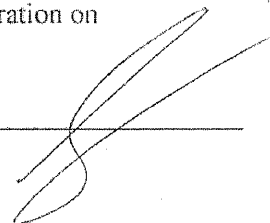
26 11. Lemuria does not contract with any California entity to receive any goods or  
27 services. Lemuria does not sell monthly memberships to any services and does not sell  
28 any goods or services to California residents or solicit customers in California. Lemuria

1 does not receive any revenue from Paypal or from any California corporation, business  
2 entity, or individual. The only contact Lemuria ever had with California was its purchase  
3 of computer servers from a company located in Fremont, California.

4 12. Prior to this litigation, Lemuria was unaware of Perfect 10's existence or its  
5 pornographic works.

6 I declare under penalty of perjury under the laws of the United States of America  
7 that the foregoing is true and correct, and that I executed this declaration on  
8 December 20, 2010 at Sofia, Bulgaria.

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ANTON TITOV



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