

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.

_____ /

**DECLARATION OF THOMAS SEHESTED IN SUPPORT OF PLAINTIFFS' MOTION
FOR SUMMARY JUDGMENT AGAINST HOTFILE CORP. AND ANTON TITOV**

PUBLIC REDACTED VERSION

I, Thomas Sehested, declare as follows:

1. I am the founder and Senior Vice President of DtecNet Software (“DtecNet”), an anti-piracy company that, among other things, monitors online websites and networks for infringing content. I have 12 years of experience working on and supervising a technical staff on anti-piracy issues. The anti-piracy work I have supervised includes monitoring for infringing content on Hotfile.com. In that regard, my team and I have extensive experience in monitoring, analyzing and downloading content files from Hotfile.com.

2. The statements made in this declaration are based on my personal knowledge including on information provided to me by colleagues or other personnel working under my supervision. If called to testify, I would testify as follows:

3. In my duties as Senior Vice President of DtecNet, I have overseen work that DtecNet has done in this case for the Motion Picture Association of America (“MPAA”) on behalf of its member companies who are plaintiffs in this case (“Plaintiffs”).

4. In November 2010, DtecNet employees acting at my supervision conducted searches for files available for download from Hotfile.com that matched the names of motion pictures and television programs of plaintiffs’ copyrighted works. As a result of those searches and at the direction of Jenner & Block LLP, DtecNet employees acting at my supervision downloaded the files available at the URLs listed in the attached Exhibit A from Hotfile.com during the period between November 7, 2010 to April 27, 2011 to servers in the United States. These files were provided to Jenner & Block LLP.

5. Additionally, DtecNet employees acting at my supervision downloaded the files available at the URLs listed in the attached Exhibit B from Hotfile.com, on behalf of Disney Enterprises, Inc. (“DEI”). Those files were provided to DEI and Jenner & Block LLP for review.



I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 15, 2012.

A handwritten signature in black ink, consisting of a large, stylized 'T' followed by a large, stylized 'S'. The signature is written over a horizontal line.

Thomas Sehested