Disney Enterprises, Inc. et al v.D &H co.t

## Exhibit B

## **Materials Consulted.**

- 1. Various data sets and technical data produced by Hotfile in this litigation, including the following data sets (as well as later-supplemented versions, as Hotfile provided updated versions of several of these sets):
  - a. Actiondat.csv
  - b. Affpay.csv
  - c. Dailydownload.csv
  - d. Dmcanotices.csv
  - e. File.csv;
  - f. Refsites.csv
  - g. Status.csv
  - h. Strikes.csv
  - i. Top500\_2.dat
  - j. Uploadip.csv
  - k. Uploads.csv
  - 1. Uploadsdownloads.csv
  - m. Uploadsurl.csv;
  - n. Userdat.csv
  - o. Users\_cowner\_upload.csv;
- 2. Source code related to the removal and blocking of files produced by Hotfile;
- 3. Transcripts and selected exhibits from of the November 16, 2011 and December 5-8 depositions of Anton Titov;
- 4. Takedown notices sent to Hotfile produced by Hotfile in this litigation;
- 5. HF0285583.
- 6. Logging data produced by Hotfile in this litigation;
- 7. Plaintiffs' Response to Hotfile's Interrogatory No. 1, including Supplements and Exhibits;
- 8. Hotfile's Response to Plaintiffs' Interrogatory No. 9;
- 9. Technical analyses produced in this litigation by Plaintiffs regarding several providers of fingerprinting technology, as well as related evidence, including:
  - a. WARNER027504
  - b. WARNER027550
  - c. WARNER027583
  - d. MPAA000014

- e. MPAA000033
- f. MPAA000071
- g. MPAA000097
- h. DISNEY005811
- i. DISNEY005871
- j. DISNEY005895.
- k. MovieLabs, Content Recognition Study: Methodology, June 1, 2007'
- 1. The deposition transcript (including exhibits) of Vobile, Inc.'s corporate representative in this case.
- 10. Patents and academic literature regarding fingerprinting technology, including:
  - a. E. Wold, T. Blum, D. Keislar, and J. Wheaten, Method and Apparatus for Creating a Unique Audio Signature, European Patent EP 1 354 276 B1. Filed 10/26/2001; Published 12/12/2007.
  - b. E. Wold, T. Blum, D. Keislar, and J. Wheaten, Content-based classification, search, and retrieval of audio, IEEE Multimedia, 3(3):27-36, Fall 1996.
  - c. J. Oostveen, T. Kalker, J. Haitsma, Feature Extraction and a Database Strategy for Video Fingerprinting. In: Recent Advances in Visual Information Systems, Lecture Notes in Computer Science 2314, pp 67-81, Springer, 2002.
  - d. J. Haitsma and T. Kalker, A Highly Robust Audio Fingerprinting System, Proceedings of the Annual Conference of The International Society for Music Information Retrieval, 2002.
  - e. J. Liu and Y. Wang, Method and System for Fingerprinting Digital Video Object Based on Multiresolution, Multirate Spatial and Temporal Signatures, US Patent 8,009,861 B2, Filed on March 2, 2007.
  - f. Vobile's Product Sheet for its vCloud9TM service.
- 11. Publicly available news accounts regarding fingerprinting technology, including:
  - a. Dailymotion Selects Audible Magic's Fingerprinting Solution for Detecting Copyrighted Video, Audible Magic Inc. Press Release, May 10, 2007. http://audiblemagic.com/pr-2007-05-10.php
  - Bebo Protects the Rights of Artists and Bands with Audible Magic, Audible Magic Inc. Press Release, June 14, 2007, http://audiblemagic.com/pr-2007-06-15.php
  - c. Vobile Announces Commercial Deployment With Leading Video Sharing Website 56.com. Press Release, Vobile Inc., March 23, 2009. http://www.reuters.com/article/2009/03/23/idUS95209+23-Mar-2009+PRN20090323
- 12. Academic and engineering trade literature regarding IP address geolocation, including:

- a. Ingmar Poese, Steve Uhlig, Mohamed Ali Kaafar, Benoit Donnet and Bamba Gueye. IP Geolocation Databases: Unreliable?, ACM SIGCOMM Computer Communication Review, 41(2), April 2011.
- b. S. Siwpersad, B. Gueye, and S. Uhlig, "Assessing the geographic resolution of exhaustive tabulation for geolocating Internet hosts," in Proc. Passive and Active Network Measurement Workshop, April 2008.
- c. M. Freedman, M. Vutukurum, N. Feamster, and H. Balakrishnan, "Geographic locality of IP prefixes," in Proc. ACM SIGCOMM Conference on Internet Measurement, October 2005.
- d. Yuval Shavitt and Noa Zilberman. "A Study of Geolocation Databases", IEEE Journal on Selected Areas in Communications, 29(9), December 2011.
- e. James A. Muir, Paul C. Van Oorschot, Internet Geolocation: Evasion and Counter evasion, ACM Computing Surveys 42:1 (2009).
- f. PADMANABHAN, V. AND SUBRAMANIAN, L. 2001. An investigation of geographic mapping techniques for Internet hosts. In Proceedings of SIGCOMM (Aug.). 173–185.

## 13. Patents regarding IP address geolocation, including:

- a. PAREKH, S., FRIEDMAN, R., TIBREWALA, N., AND LUTCH, B. 2004. Systems and methods for determining collecting and using geographic locations of Internet users. United States Patent 6,757,740. Assigned to Digital Envoy, Inc. Filed March 31, 2000. Issued June 29, 2004.
- b. HUFFMAN, S. AND REIFER, M. 2005. Method for geolocating logical network addresses. United States Patent 6,947,978. Assigned to the United States of America as represented by the Director, National Security Agency. Filed December 29, 2000. Issued September 20, 2005.
- c. ANDERSON, M., BANSAL, A., DOCTOR, B., HADJIYIANNIS, G., HERRINGSHAW, C., KARPLUS, E., AND MUNIZ, D. 2004. Method and apparatus for estimating a geographic location of a networked entity. United States Patent 6,684,250. Assigned to Quova, Inc. Filed April 3, 2001. Issued January 27, 2004.