

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.,

Counter-Defendant.

_____ /

**NOTICE OF DEFENDANTS HOTFILE CORPORATION AND
ANTON TITOV OF SCRIVENER’S ERROR IN THE MOTION
AND MEMORANDUM OF LAW OF DEFENDANTS TO
STRIKE THE DECLARATION OF JENNIFER V. YEH FILED
IN SUPPORT OF PLAINTIFFS’ MOTION FOR SUMMARY
JUDGMENT AND TO STRIKE ANY REFERENCES IN PLAINTIFFS’
MOTION FOR SUMMARY JUDGMENT OR STATEMENT OF
FACTS TO THE YEH DECLARATION AND ITS ATTACHMENTS**

Defendants, Hotfile Corporation and Anton Titov (collectively “Defendants”), hereby give notice of a scrivener’s error in their Motion to Strike the Declaration of Jennifer V. Yeh Filed in Support of Plaintiffs’ Motion for Summary Judgment and to Strike Any Reference in Plaintiffs’ Motion for Summary Judgment or Statement of Facts to the Yeh Declaration and its Attachments. The Certificate of Good Faith Attempt to Resolve the Motion was unintentionally omitted from the filed version of the Motion to Strike, filed March 7, 2012. Undersigned counsel apologizes for the error and requests that the Court accept the attached Certificate of Good Faith Attempt to Resolve that is attached hereto as Exhibit “A.”

DATED: March 8, 2012

Respectfully submitted,

s/ Janet T. Munn

Janet T. Munn, Esq. Fla. Bar No. 501281

Email: jmunn@rascoklock.com

RASCO KLOCK

283 Catalonia Avenue, Suite 200

Coral Gables, FL 33134

Telephone: 305.476.7101

Telecopy: 305.476.7102

*Counsel for Defendants Hotfile Corporation
and Anton Titov*

CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2012, a true and correct copy of the foregoing document was served on all counsel of record or pro se parties identified below either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

Karen L. Stetson, Esq.
GRAY-ROBINSON, P.A.
Email: Karen.Stetson@gray-robinson.com
1221 Brickell Avenue
Suite 1600
Miami, FL 33131
Telephone: 305.416.6880
Telecopy: 305.416.6887

Karen R. Thorland, Esq. (admitted *pro hac vice*)
Senior Content Protection Counsel
Email: Karen_Thorland@mpaa.org
Motion Picture Association of America, Inc.
15301 Ventura Boulevard, Building E
Sherman Oaks, CA 91403-5885
Telephone: 818.935.5812

Steven B. Fabrizio, Esq. (admitted *pro hac vice*)
Email: sfabrizio@jenner.com
Duane C. Pozza, Esq. (admitted *pro hac vice*)
Email: dpozza@jenner.com
Luke C. Platzer, Esq. (admitted *pro hac vice*)
Email: lplatzer@jenner.com
JENNER AND BLOCK, LLP
1099 New York Ave, N.W.
Suite 900
Washington, DC 20001
Telephone: 202.639.6000
Telecopy: 202.639.6066

By: /s/ Janet T. Munn
Janet T. Munn

EXHIBIT “A”

CERTIFICATE OF GOOD FAITH ATTEMPT TO RESOLVE

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that on March 5, 2012, prior to filing this motion, as counsel for the movant, I, N. Andrew Leibnitz, Esq., conferred with Duane Pozza, Esq., counsel for Plaintiffs, in a good faith effort to resolve the issues raised in this motion, but was unable to resolve the issues and that Plaintiffs oppose this motion.

s/ N. Andrew Leibnitz
N. Andrew Leibnitz, Esq.