

EXHIBIT 24

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

DISNEY ENTERPRISES, INC.,
TWENTIETH CENTURY FOX FILM
CORPORATION, UNIVERSAL CITY
STUDIOS PRODUCTIONS LLP,
COLUMBIA PICTURES INDUSTRIES,
INC., and WARNER BROS.
ENTERTAINMENT INC.,

Plaintiffs,
CASE NO.

vs.

11-20427-WILLIAMS-TURNOFF

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

Defendants.

AND RELATED CROSS-ACTION.

****CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER****

VIDEOTAPED DEPOSITION OF STEVE THOMAS KANG

Los Angeles, California

Tuesday, December 20, 2011

Reported by:
MELISSA M. VILLAGRAN
CSR No. 12543, RPR, CLR
JOB No. 179891

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Videotaped deposition of STEVE THOMAS KANG,
taken on behalf of Defendants, at 633 West Fifth
Street, 36th Floor, Los Angeles, California,
beginning at 9:07 a.m. and ending at 4:42 p.m. on
Tuesday, December 20, 2011, before MELISSA M.
VILLAGRAN, Certified Shorthand Reporter No. 12543,
RPR, CLR.

1 APPEARANCES:

2

3 For Plaintiffs:

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16 Brent Jordan, Sarnoff Court Reporters

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1 with content owners?

2 MR. PLATZER: Objection to the form;
3 incomplete hypothetical.

4 THE DEPONENT: I would say that certainly
04:35 5 if -- if -- if Hotfile -- if Hotfile wanted to
6 cooperate with -- with Universal, certainly the
7 effective implementation of content recognition
8 technology to prevent the easy availability of
9 infringing content would be a huge step -- or it
04:35 10 would be a huge step in the right direction.

11 But it would certainly have to be
12 effective. It couldn't be done in a way that leaves
13 huge loopholes. And ultimately, what we would be
14 looking for is sort of proof in the pudding. You
04:36 15 know, is this site -- is this site, in effect, on
16 the whole, becoming clean of -- of massive copyright
17 infringement.

18 BY MS. THAMKUL:

19 Q Is there any content recognition technology
04:36 20 that is 100 percent guaranteed to catch all
21 unauthorized content on a website?

22 MR. PLATZER: Objection to the form. Also
23 objection that it lacks foundation.

24 THE DEPONENT: Not to my knowledge. I
04:36 25 mean, also, I don't know -- I -- I'm not aware of

1 any content recognition technology with that kind of
2 a guarantee.

3 BY MS. THAMKUL:

4 Q So it's possible that even if Hotfile
04:36 5 implemented content recognition technology, that
6 some content files could slip through the cracks?

7 MR. PLATZER: Objection; incomplete
8 hypothetical, lacks foundation.

9 THE DEPONENT: It is possible. But, you
04:37 10 know, we would be looking for effective
11 implementation. My -- my broad sense of effective
12 implementation wouldn't be -- doesn't necessarily
13 require 100 percent -- 100 percent effectiveness.

14 BY MS. THAMKUL:

04:37 15 Q Does Universal have a percentage of
16 effectiveness that -- scratch that.

17 Does Universal have a percentage of
18 infringement that it would allow on a website and
19 yet consider the efforts of that website to reduce
04:37 20 infringement to be effective?

21 MR. PLATZER: Objection to form. And also
22 objection -- beyond the scope. Mr. Kang is not here
23 as a 30(b)(6) representative on behalf of the
24 company. You noticed him in his personal capacity
04:38 25 here, so this whole line of questioning, treating

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I, STEVE THOMAS KANG, do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

EXECUTED this 27th day of January,
2012, at West Hollywood, CA.
(City) (State)



STEVE THOMAS KANG


1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, Registered
3 Professional Reporter, Certified Live Note Reporter,
4 do hereby certify:

5 That the foregoing proceedings were taken
6 before me at the time and place herein set forth;
7 that any witnesses in the foregoing proceedings,
8 prior to testifying, were duly sworn; that a record
9 of the proceedings was made by me using machine
10 shorthand which was thereafter transcribed under my
11 direction; that the foregoing transcript is a true
12 record of the testimony given.

13 Further, that if the foregoing pertains to
14 the original transcript of a deposition in a Federal
15 Case, before completion of the proceedings, review
16 of the transcript [] was [x] was not requested.
17 I further certify I am neither financially
18 interested in the action nor a relative or employee
19 of any attorney or party to this action.

20 IN WITNESS WHEREOF, I have this date
21 subscribed my name.

22
23 Dated: 12-28-11

24 
25 MELISSA M. VILLAGRAN
CSR No. 12543 RPR, CLR