Yeh Exhibit 125

1	UNITED STATES DISTRICT COURT
~	SOUTHERN DISTRICT OF FLORIDA
2	CASE NO. 11-20427-WILLIAMS-TURNOFF
3	
4	DISNEY ENTERPRISES, INC.,
_	TWENTIETH CENTURY FOX FILM
5	CORPORATION, UNIVERSAL CITY
_	STUDIOS PRODUCTIONS LLLP,
6	COLUMBIA PICTURES INDUSTRIES,
	INC., and WARNER BROS.
7	ENTERTAINMENT INC.,
8	Plaintiffs,
9	vs.
10	HOTFILE CORP., ANTON TITOV,
	and DOES 1-10,
11	
	Defendants.
12	
	AND RELATED CROSS-ACTION.
13	
14	
15	HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
16	VIDEOTAPED DEPOSITION OF BETSY ZEDEK, ESQUIRE
17	PURSUANT TO FEDERAL RULE 30(b)(6)
18	Los Angeles, California
19	Tuesday, December 13, 2011
20	
21	Reported by:
	CHERYL R. KAMALSKI
22	CSR No. 7113
23	Job No. 179149
24	
25	
	Page 1

1	UNITED STATES DISTRICT COURT				
2	SOUTHERN DISTRICT OF FLORIDA				
3	CASE NO. 11-20427-WILLIAMS-TURNOFF				
4	DISNEY ENTERPRISES, INC.,				
	TWENTIETH CENTURY FOX FILM				
5	CORPORATION, UNIVERSAL CITY				
	STUDIOS PRODUCTIONS LLLP,				
6	COLUMBIA PICTURES INDUSTRIES,				
	INC., and WARNER BROS.				
7	ENTERTAINMENT INC.,				
8	Plaintiffs,				
9	vs.				
10	HOTFILE CORP., ANTON TITOV,				
	and DOES 1-10,				
11					
	Defendants.				
12					
	AND RELATED CROSS-ACTION.				
13					
14	HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER				
15					
16	Videotaped Deposition of BETSY ZEDEK, ESQUIRE,				
17	pursuant to Federal Rule 30(b)(6), taken on behalf of				
18	Defendants and Counterclaimant, at 633 West Fifth				
19	Street, Suite 3600, Los Angeles, California, beginning				
20	at 9:37 a.m. and ending at 5:27 p.m. on Tuesday,				
21	December 13, 2011, before CHERYL R. KAMALSKI, Certified				
22	Shorthand Reporter No. 7113.				
23					
24					
25					
	Page 2				

1	APPEARANCES:
2	
3	For Plaintiffs:
4	JENNER & BLOCK LLP
	BY: DUANE POZZA
5	Attorney at Law
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6	Washington, D.C. 20001-4412
	202.639.6000
7	
	For Defendants and Counterclaimant:
8	
	FARELLA BRAUN + MARTEL LLP
9	BY: JANEL THAMKUL
	Attorney at Law
10	235 Montgomery Street
	San Francisco, California 94104
11	415.954.4400
12	Also Present:
13	ELIZABETH VALENTINA
14	Videographer:
15	CHRIS JORDAN
	SARNOFF, a Veritext Company
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
	Page 3

1	Q Does Fox have a special rightsholder account
2	with Hotfile?
3	A I do not believe that Fox holds one directly as
4	in internally at Fox.
5	Q Did Fox ever ask for a special rightsholder
6	account from Hotfile?
7	MR. POZZA: Objection; ambiguous.
8	THE WITNESS: I'm not sure. I'm not aware that
9	we did. But it may have happened in the context of this
10	litigation.
11	BY MS. THAMKUL:
12	Q Do you know if any of Fox's vendors use
13	Hotfile's special rightsholder account?
14	A I am aware that some of them have used it, yes.
15	Q Which ones?
	Page 77
	Sarnoff, A VERITEXT COMPANY 877-955-3855

1	I, the undersigned, a Certified Shorthand
2	Reporter of the State of California, do hereby certify:
3	That the foregoing proceedings were taken
4	before me at the time and place herein set forth; that
5	any witnesses in the foregoing proceedings, prior to
6	testifying, were duly sworn; that a record of the
7	proceedings was made by me using machine shorthand
8	which was thereafter transcribed under my direction;
9	that the foregoing transcript is a true record of the
10	testimony given.
11	Further, that if the foregoing pertains to
12	the original transcript of a deposition in a Federal
13	Case, before completion of the proceedings, review of
14	the transcript [] was [] was not requested
15	I further certify I am neither financially
16	interested in the action nor a relative or employee
17	of any attorney or any party to this action.
18	IN WITNESS WHEREOF, I have this date subscribed
19	my name.
20	
21	Dated: 12/22/2011
22	
23	
	CHERYL R. KAMALSKI
24	CSR No. 7113
25	
	Page 222

Yeh Exhibit 126

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF FLORIDA

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

Plaintiffs,

CASE NO. 11-20427-WILLIAMS-TURNOFF

vs.

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

Defendants.

AND RELATED CROSS-ACTION.

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF MICHAEL BENTKOVER

Los Angeles, California

Tuesday, December 13, 2011

Reported by: LORI SCINTA, RPR CSR No. 4811

Job No. 177476A



IF.

1	UNITED STATES DISTRICT COURT
2	SOUTHERN DISTRICT OF FLORIDA
3	
4	DISNEY ENTERPRISES, INC., TWENTIETH CENTURY FOX FILM
5	CORPORATION, UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP,
6	COLUMBIA PICTURES INDUSTRIES, INC., and WARNER BROS.
7	ENTERTAINMENT INC.,
8	Plaintiffs,
9	CASE NO. vs. 11-20427-WILLIAMS-TURNOFF
10	HOTFILE CORP., ANTON TITOV, and DOES 1-10,
11	Defendants.
12	
13	AND RELATED CROSS-ACTION.
14	
15	HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
16	Videotaped deposition of MICHAEL BENTKOVER,
17	taken on behalf of Defendants and Counterclaimant
18	at 633 West Fifth Street, Suite 3600, Los Angeles,
19	California, beginning at 9:38 A.M. and ending at
20	12:17 P.M. on Tuesday, December 13, 2011, before
21	LORI SCINTA, RPR, Certified Shorthand Reporter No.
22	4811.
23	
24	
25	



```
1
      APPEARANCES:
 2
 3
      For Plaintiffs:
 4
           JENNER & BLOCK LLP
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                STEVEN B. FABRIZIO
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      For Defendants and Counterclaimant:
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      Videographer:
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           VONYARN MASON
           SARNOFF COURT REPORTERS
19
           20 Corporate Park, Suite 350
           Irvine, California 92606
20
           877.955.3855
21
22
23
24
25
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12/13/2011

	1	
09 : 54	1	MR. FABRIZIO: You're literally just asking him
09 : 54	2	to read it? You're not asking him to agree with it
09:54	3	or ask him whether
09:54	4	MR. ENGSTROM: Just in the record. I want to
09 : 54	5	get it read into the record.
09:54	6	THE WITNESS: "Dear Hotfile, I wanted
09:54	7	to follow-up and find out if Hotfile
09 : 54	8	is ready for Warner Bros. to use a
09:54	9	rapid takedown tool which you have
09:54	10	been working on establishing.
09:54	11	"We have been sending many
09:54	12	takedown notices (including thousands
09:55	13	of infringing links) and we appreciate
09:55	14	how fast you've been removing files,
09 : 55	15	but unfortunately the files are
09 : 55	16	reposted immediately and having a
09 : 55	17	takedown tool would be ideal in order
09 : 55	18	to curb piracy."
09 : 55	19	BY MR. ENGSTROM:
09 : 55	20	Q Did you appreciate how do you agree with it?
09 : 55	21	You appreciated how fast Hotfile was removing files?
09:55	22	A No.
09 : 55	23	Q You don't agree with the statement that you
09 : 55	24	made?
09:55	25	MR. FABRIZIO: Objection.



	1	
09:55	1	THE WITNESS: No.
09:55	2	BY MR. ENGSTROM:
09:55	3	Q Why did you tell Hotfile that you appreciated
09:55	4	how fast they had been removing files?
09:55	5	A I was simply being courteous.
09:55	6	Q Okay. Did Hotfile did you ever in any other
09 : 55	7	instance that you can that you're aware of indicate
09 : 55	8	to Hotfile that they were fast in responding to files
09:55	9	and that you were satisfied with it?
09:55	10	MR. FABRIZIO: Objection. Lacks foundation.
09 : 55	11	THE WITNESS: I don't remember the question.
09 : 55	12	Please repeat it.
09:55	13	BY MR. ENGSTROM:
09:55	14	Q Did you in any other circumstances other than
09:56	15	this instance tell Hotfile that you were appreciative of
09:56	16	how fast they had been removing files when in reality
09:56	17	you believed they were not removing files quickly?
09:56	18	MR. FABRIZIO: Objection. Lacks foundation and
09:56	19	compound.
09:56	20	THE WITNESS: Yes, I believe I wrote that in a
09:56	21	few emails to them. It was a standard response. I was
09 : 56	22	being polite and courteous.
09 : 56	23	BY MR. ENGSTROM:
09:56	24	Q Okay. Do you believe that Hotfile had any
09:56	25	reason to believe that you were dissatisfied with the



12/13/2011

10:04	1	MR. ENGSTROM: "I just wanted to thank you
10:04	2	again for the removal tool and increasing our limit to
10:04	3	1000 per day" and "for Warner Bros.' Removals."
10:04	4	MR. FABRIZIO: Objection. I'm not quite sure
10:04	5	you read that right.
10:04	6	MR. ENGSTROM: I can try again.
10:04	7	"I just wanted to thank you again for the
10:04	8	removal tool and increasing our limit to 1000 per day
10:04	9	for Warner Bros.' Removals."
10:04	10	Q Was Warner Bros. satisfied with the SRA tool?
10:04	11	MR. FABRIZIO: Objection. Lacks foundation,
10:04	12	calls for speculation.
10:04	13	THE WITNESS: No.
10:04	14	BY MR. ENGSTROM:
10:04	15	Q Were you satisfied with the SRA tool?
10:04	16	A No.
10:04	17	Q Why were you not satisfied with the SRA tool?
10:04	18	A The nature of piracy causes people to upload
10:05	19	and reupload after they're being deleted, and it still
10:05	20	wasn't enough.
10:05	21	Q It wasn't enough to what?
10:05	22	A Curb piracy on Hotfile.
10:05	23	Q Okay. Did you ever communicate to Hotfile that
10:05	24	the SRA was insufficient to curb piracy on Hotfile?
10:05	25	MR. FABRIZIO: Lacks foundation.



12/13/2011

	1	
10:06	1	A Did I appreciate the tool?
10:06	2	Q Yes.
10:06	3	A Yes, I did.
10:06	4	Q Why did you appreciate the tool?
10:06	5	A Because I needed a way to take the files down
10:06	6	as fast as possible.
10:06	7	Q Do you believe that Hotfile was cooperating
10:06	8	with you in combating piracy on the site?
10:06	9	A No, I do not.
10:06	10	MR. FABRIZIO: Objection. Vague.
10:06	11	BY MR. ENGSTROM:
10:06	12	Q You do not?
10:06	13	Why do you not believe they were cooperating
10:06	14	with you to combat piracy on the site?
10:06	15	MR. FABRIZIO: Same objection.
10:06	16	THE WITNESS: The piracy problem was not enough
10:06	17	just to take the files down. Hotfile was doing nothing
10:06	18	else to stop the problem.
10:06	19	BY MR. ENGSTROM:
10:06	20	Q Did you ever ask Hotfile to do anything else to
10:06	21	stop the problem?
10:06	22	MR. FABRIZIO: Objection. Lacks foundation.
10:06	23	THE WITNESS: No, I did not.
10:06	24	BY MR. ENGSTROM:
10:06	25	Q You did not.



MICHAEL BENTKOVER HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

1 I, the undersigned, a Certified Shorthand 2 3 Reporter of the State of California, do hereby certify: 4 That the foregoing proceedings were taken 5 before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to 6 7 testifying, were duly sworn; that a record of the proceedings was made by me using machine shorthand 8 9 which was thereafter transcribed under my direction; 10 that the foregoing transcript is a true record of the 11 testimony given. 12 Further, that if the foregoing pertains to the original transcript of a deposition in a Federal 13 14 Case, before completion of the proceedings, review of 15 the transcript [x] was [] was not requested. 16 I further certify I am neither financially 17 interested in the action nor a relative or employee 18 of any attorney or party to this action. 19 IN WITNESS WHEREOF, I have this date 20 subscribed my name. 21 22 Dated: 12-15-11 23 24 LORI SCINTA, RPR 25 CSR No. 4811



12/13/2011

Yeh Exhibit 127

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF FLORIDA

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

Plaintiffs,

CASE NO. 11-20427-WILLIAMS-TURNOFF

vs.

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

Defendants.

AND RELATED CROSS-ACTION.

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF DAVID P. KAPLAN, ESQUIRE

PURSUANT TO FEDERAL RULE 30(b)(6)

Los Angeles, California

Tuesday, December 13, 2011

Volume 1

Reported by: LORI SCINTA, RPR CSR No. 4811

Job No. 177476B



DAVID P. KAPLAN, ESQ. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

F

1	UNITED STATES DISTRICT COURT
2	SOUTHERN DISTRICT OF FLORIDA
3	
4	DISNEY ENTERPRISES, INC., TWENTIETH CENTURY FOX FILM
5	CORPORATION, UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP,
6	COLUMBIA PICTURES INDUSTRIES,
7	INC., and WARNER BROS. ENTERTAINMENT INC.,
8	Plaintiffs,
9	CASE NO. vs. 11-20427-WILLIAMS-TURNOFF
_	
10	HOTFILE CORP., ANTON TITOV, and DOES 1-10,
11	Defendants.
12	
13	AND RELATED CROSS-ACTION.
14	
15	CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
16	Videotaped deposition of DAVID P. KAPLAN,
17	ESQUIRE, Volume 1, pursuant to Federal Rule 30(b)(6),
18	taken on behalf of Defendants and Counterclaimant,
19	at 633 West Fifth Street, Los Angeles, California,
20	beginning at 2:18 P.M. and ending at 4:58 P.M. on
21	Tuesday, December 13, 2011, before LORI SCINTA, RPR,
22	Certified Shorthand Reporter No. 4811.
23	
24	
25	



DAVID P. KAPLAN, ESQ. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

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           FARELLA BRAUN + MARTEL LLP
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22
23
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DAVID P. KAPLAN, ESQ. 12/13/2011 CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

02:41 MR. FABRIZIO: Objection. Compound, overbroad 1 02:41 and calls for speculation. 2 02:41 I'm sure you have all those documents. 3 02:41 THE WITNESS: Yeah. I'd have to look at those 4 02:41 5 documents one by one and see, but I do recall that there 02:41 6 were some discussion in -- in the requesting additional 02:41 7 capacity for the takedown tool that the problem of 02:41 8 infringement on Hotfile was becoming so overwhelming 02:41 9 that the SRA tool as had been originally provided, you 02:42 10 know, was ineffective. 02:42 11 MR. ENGSTROM: Let me mark as Exhibit 24 an 02:42 12 email that describes perhaps what you're talking about. 02:42 13 (WB Exhibit 24 was marked for 02:43 14 identification by the court reporter.) 02:43 15 BY MR. ENGSTROM: 02:43 16 Do you recognize this document? Q

02:43 17 A I do.

02:4318QOkay. Do you have any reason to believe it's02:4319not an authentic document?

02:43 20 A I don't.

02:4321QOkay. Michael Bentkover in this email dated02:4322September 3rd, 2009, writes to Hotfile and says,02:4323"I just wanted to thank you again for

02:43 24

02:43 25

limit to" a thousand "per day for

The removal tool and increasing our



12/13/2011

DAVID P. KAPLAN, ESQ. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

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02:43	1	Warner Bros."
02:43	2	He then goes on to ask, "Can you
02:43	3	increase our limit to 2,000 just to be
02:43	4	on the safe side which will ensure we
02:43	5	don't have to email you for your
02:43	6	prompt action?"
02:43	7	Is he referring to this request to increase
02:43	8	files that you referred to a minute ago?
02:44	9	MR. FABRIZIO: Objection. Calls for
02:44	10	speculation.
02:44	11	THE WITNESS: I'm not sure exactly other than
02:44	12	what's contained in the email.
02:44	13	The and reading that, my understanding was
02:44	14	that we were bumping up against the limit as originally
02:44	15	established for the SRA tool and the overflow was then
02:44	16	having to go through the old email way of communicating
02:44	17	through the abuse account.
02:44	18	And so because we had a number of big titles
02:44	19	coming up that fall, he was asking if the SRA tool could
02:44	20	have the limit increased to account for that.
02:44	21	We expected that there would be more piracy on
02:44	22	Hotfile.
02:44	23	BY MR. ENGSTROM:
02:44	24	Q Did Hotfile ever refuse to or fail to increase
02:44	25	the quota of files that could be deleted through the SRA



12/13/2011

DAVID P. KAPLAN, ESQ. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

I, DAVID P. KAPLAN, ESQUIRE, 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 13th day of Jonican 2012, at Dubulc , Caffor (City) (State) DAVID P. KAPLAN, ESQUIRE Volume 1

DAVID P. KAPLAN, ESQ. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

12/13/2011

1		ERRATA SHEET
2	Pg/Ln	Corrections
3	<u>/3/</u> Change	from: delete No'
4	Change	to:
5	<u>///</u> / Change	from: 1 dint
6	Change	to: 77
7	72 / 18 Change	from: add "on' before "a"
8	Change	to:
9	/ Change	from:
10	Change	to:
11	/ Change	from:
12	Change	to:
13	/ Change	from:
14	Change	to:
15	/ Change	from:
16	Change	to:
17 8	/ Change	from:
18	Change	to:
19	/ Change	from:
20	Change	to:
21	/ Change	from:
22	Change	to:
23	/ Change	from:
24	Change	t g :
25	Signature:	Date: 11/13/2012



DAVID P. KAPLAN, ESQ. CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

1 I, the undersigned, a Certified Shorthand 2 3 Reporter of the State of California, do hereby certify: 4 That the foregoing proceedings were taken 5 before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to 6 7 testifying, were duly sworn; that a record of the proceedings was made by me using machine shorthand 8 9 which was thereafter transcribed under my direction; 10 that the foregoing transcript is a true record of the 11 testimony given. 12 Further, that if the foregoing pertains to 13 the original transcript of a deposition in a Federal 14 Case, before completion of the proceedings, review of 15 the transcript [x] was [] was not requested. 16 I further certify I am neither financially 17 interested in the action nor a relative or employee 18 of any attorney or party to this action. 19 IN WITNESS WHEREOF, I have this date 20 subscribed my name. 21 22 Dated: 12-15-11 23 24 LORI SCINTA, RPR 25 CSR No. 4811



Yeh Exhibit 128

	Page 1
1	UNITED STATES DISTRICT COURT
	SOUTHERN DISTRICT OF FLORIDA
2	CASE NO. 11-20427-WILLIAMS/TURNOFF
3	
Л	DISNEY ENTERPRISES,
4	INC., TWENTIETH CENTURY
5	FOX FILM CORPORATION,
5	UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP,
6	COLUMBIA PICTURES
	INDUSTRIES, INC., and
7	WARNER BROS.
	ENTERTAINMENT, INC.,
8	
9	Plaintiff,
10	V.
11	HOTFILE CORP., ANTON
	TITOV, and DOES 1-10,
12	
13	Defendants.
14	
15	HOTFILE CORP.,
16	Counterclaimant,
17 18	V.
10	WARNER BROS ENTERTAINMENT
19	INC.,
20	Counterdefendant.
	VOLUME I
21	HIGHLY CONFIDENTIAL
	(Pursuant to protective order, the following
22	transcript has been designated highly confidential)
23	30(b)(6) DEPOSITION OF ANTON TITOV
	Radisson Blu Hotel
24	Sofia, Bulgaria
	Monday, December 5, 2011
25	Job Number: 44174

2

		Page
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9	AND ANTON TITOV:	
	FARELLA, BRAUN & MARTEL	
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Page 3

Also present: Court reporter: Fiona Farson TSG Reporting Videographer: Simon Rutson TSG Reporting Interpreter: Assist. Prof. Boris Naimushin, Ph.D.

Highly Confidential

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			Page	64
6				
7	Q.	Okay. Does Lemuria have a physical office?		
8	Α.	Yes, it does.		
9	Q.	And where is that?		
10	Α.	In Fort Lauderdale, Florida.		
	Q.	What is the address?		
11	Α.	110 East Broward Boulevard, suite number 1736.		
12	Q.	1736?		
13	A.	1736, correct.		
14	Q.	And you said "Broward"; is that B-R-O-W-A-R-D?		
15	A.	Yes, I believe so.		
16	Q.	Okay. And is that address an office, or is that		
17		a mailbox service?		
18	Α.	It is an office.		
19	Q.	Okay. Have you ever visited that office?		
20	Α.	Yes, I did.		
21	Q.	Does anybody currently work out of that office?		
22	Α.	Currently not.		
23	Q.	Can you repeat your answer?		
24	Α.	Currently not.		
25	Q.	Has anyone ever worked out of that office?		

	Page 65
MR.	THOMPSON: Objection, vague.
A.	"Ever" is a big time. So I visited the office;
	I performed some work inside it. So as for me, yes.
BY	MR. FABRIZIO:
Q.	Okay, let me ask it this way: Other than you
	periodically visiting the office, has anyone ever worked
	from Lemuria's office on 110 East Broward Boulevard?
A.	I don't actually know.
Q.	You don't know, or no?
Α.	I don't know, but I don't believe anybody worked, except
	me, from this office for Hotfile.
Q.	Approximately how many days have you spent working out
	of that office?
A.	I don't know.
Q.	More than ten?
MR.	THOMPSON: Objection. Calls for speculation.
A.	It could be ten, but it's kind of hard decision. Most
	А. ВҮ Q. А. Q. А. Q. М.

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Page 188 HIGHLY CONFIDENTIAL CERTIFICATE OF DEPONENT I, ANTON TITOV, hereby certify that I have read the foregoing pages of my deposition of testimony taken in these proceedings on Monday, December 5, 2011, and, with the exception of the changes listed on the next page and/or corrections, if any, find them to be a true and accurate transcription thereof. Signed: ANTON TITOV Name: 29/2012 Date:

TSG Reporting - Worldwide 800-702-9580

REDACTED

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Page 189
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                      HIGHLY CONFIDENTIAL
                     CERTIFICATE OF COURT REPORTER
2
 3
     I, Fiona Farson, with TSG Reporting, hereby certify that the
 4
     testimony of the witness Anton Titov in the foregoing
     transcript, taken on Monday, December 5, 2011 was reported
 5
     by me in machine shorthand and was thereafter transcribed by
     me; and that the foregoing transcript is a true and accurate
 6
     verbatim record of the said testimony.
7
     I further certify that I am not a relative, employee,
8
     counsel or financially involved with any of the parties to
     the within cause, nor am I an employee or relative of any
 9
     counsel for the parties, nor am I in any way interested in
     the outcome of the within cause.
10
11
12
13
14
     Signed:
                      . . . . . . . . . . . . . . . . .
15
     Fiona Farson
16
     Dated: December 15th, 2011
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Page 191 1 UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA 2 CASE NO. 11-20427-WILLIAMS/TURNOFF 3 DISNEY ENTERPRISES, 4 INC., TWENTIETH CENTURY FOX FILM CORPORATION, 5 UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, 6 COLUMBIA PICTURES INDUSTRIES, INC., and 7 WARNER BROS. ENTERTAINMENT, INC., 8 9 Plaintiff, 10 v. 11 HOTFILE CORP., ANTON TITOV, and DOES 1-10, 12 13 Defendants. 14 HOTFILE CORP., 15 Counterclaimant, 16 v. 17 WARNER BROS ENTERTAINMENT 18 INC., Counterdefendant. 19 20 VOLUME II HIGHLY CONFIDENTIAL 21 (Pursuant to protective order, the following transcript has been designated highly confidential) 22 30(b)(6) DEPOSITION OF ANTON TITOV 23 Radisson Blu Hotel Sofia, Bulgaria 24 Tuesday, December 6, 2011 AT: 9:10 a.m. 25 Job No: 44175

		Page	192
1	A P P E A R A N C E S		
2	ATTORNEY FOR THE PLAINTIFFS:		
3	JENNER & BLOCK		
	BY: STEVEN B. FABRIZIO, ESQ.		
4	1099 New York Avenue, NW		
5	Washington, DC 20001		
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8			
	ATTORNEY FOR THE DEFENDANTS HOTFILE CORP.,		
9	AND ANTON TITOV:		
	FARELLA, BRAUN & MARTEL		
10	BY: RODERICK M. THOMPSON, ESQ.		
	235 Montgomery Street		
11	San Francisco, California 94104		
12			
13	BOSTON LAW GROUP		
	VALENTIN GURVITS		
14	825 Beacon Street		
	Newton Center, MA 02459		
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Page 193 Also present: Court reporter: Fiona Farson TSG Reporting Videographer: Simon Rutson TSG Reporting Interpreter: Assist. Prof. Boris Naimushin, Ph.D. Technical expert: Kelly Truelove

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9 10	Q.	In what ways has Hotfile attempted to cooperate with
10	7	Warner and the other studios?
12	Α.	By responding expeditiously to takedown notices,
13		providing SRA tool to Warner and Dtecnet, who is agent for I believe other studios; I'm not sure.
14		(Reporter clarification.)
15	Α.	
16	Π.	but that's what I can think of.
17	BY	MR. FABRIZIO:
18	Q.	Well, can you think of any other way in which Hotfile
19	χ.	attempted to cooperate with Warner and the other
20		studios?
21	Α.	I don't know. That's what I can think of now.

REDACTED

Yeh Exhibit 129

REDACTED