

Highly Confidential

Page 191

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF FLORIDA  
3 CASE NO. 11-20427-WILLIAMS/TURNOFF

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4 DISNEY ENTERPRISES,  
5 INC., TWENTIETH CENTURY  
6 FOX FILM CORPORATION,  
7 UNIVERSAL CITY STUDIOS  
8 PRODUCTIONS LLLP,  
9 COLUMBIA PICTURES  
10 INDUSTRIES, INC., and  
11 WARNER BROS.  
12 ENTERTAINMENT, INC.,

13 Plaintiff,

14 v.

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

17 Defendants.

18 HOTFILE CORP.,

19 Counterclaimant,

20 v.

21 WARNER BROS ENTERTAINMENT  
22 INC.,

23 Counterdefendant.

24 - - - - -  
25 VOLUME II

26 H I G H L Y C O N F I D E N T I A L  
27 (Pursuant to protective order, the following  
28 transcript has been designated highly confidential)

29 30 (b) (6) DEPOSITION OF ANTON TITOV  
30 Radisson Blu Hotel  
31 Sofia, Bulgaria  
32 Tuesday, December 6, 2011  
33 AT: 9:10 a.m.  
34 Job No: 44175

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A P P E A R A N C E S

ATTORNEY FOR THE PLAINTIFFS:

JENNER & BLOCK

BY: STEVEN B. FABRIZIO, ESQ.

1099 New York Avenue, NW

Washington, DC 20001

ATTORNEY FOR THE DEFENDANTS HOTFILE CORP.,  
AND ANTON TITOV:

FARELLA, BRAUN & MARTEL

BY: RODERICK M. THOMPSON, ESQ.

235 Montgomery Street

San Francisco, California 94104

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VALENTIN GURVITS

825 Beacon Street

Newton Center, MA 02459

1 Also present:

2 Court reporter:

3 Fiona Farson  
TSG Reporting

4

5 Videographer:

6 Simon Rutson  
TSG Reporting

7

8 Interpreter:

9 Assist. Prof. Boris Naimushin, Ph.D.

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11 Technical expert:

12 Kelly Truelove

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

9 Q. Currently -- just wait one second; I kind of feel like  
10 it's dial-an-expert. It's kind of like he's here.

11 MR. THOMPSON: We can't hear what he's saying, though.

12 MR. FABRIZIO: You can't hear what he's saying; I can.  
13 I feel like a newscaster.

14 MR. THOMPSON: That's right. Maybe a puppet, huh?

15 BY MR. FABRIZIO:

16 Q. Okay. Sorry, my editor was talking.

17 Currently, Hotfile receives DMCA notices by regular  
18 mail, correct?

19 A. Correct.

20 Q. By facsimile, correct?

21 A. Correct.

22 Q. By email, correct?

23 A. Correct.

24 Q. And by special rights holder account, correct?

25 A. Correct.

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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 Tuesday, December 6, 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: .....

Name: ANTON TITOV

Date: 1/20/2012 .....

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E R R A T A

Deposition of ANTON TITOV

Page/Line No.	Description	Reason for change
225:25	Remind me. --> There might be.	Correct transcription
234:20	Presentation --> representation	Correct transcription
234:20	cost of the --> concept of	Correct transcription
261:2	As --> That's	Correct transcription
273:20	Limewire --> Limelight	Correct transcription
279:3	is --> would	Correct transcription
293:11	following --> logging	Correct transcription
306:5	calls --> holds	Correct transcription
306:6	service at hotfile.com --> to abuse@hotfile.com	Correct trans.
321:6	would decide it --> with this ID	Correct transcription
333:20	brought --> blocked	Correct transcription
337:7	file --> file ID	Correct transcription

Signed: .....

Name: ANTON TITOV

Date: .....

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HIGHLY CONFIDENTIAL

E R R A T A

Deposition of ANTON TITOV

Page/Line No.	Description	Reason for change
361:25	state --> table	Correct transcription
368:7	users stay on our uploads --> users_cowner_upload	Correct trans

Signed: .....

Name: ANTON TITOV

Date: 1/20/2012 .....



HIGHLY CONFIDENTIAL  
CERTIFICATE OF COURT REPORTER

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I, Fiona Farson, with TSG Reporting, hereby certify that the testimony of the witness Anton Titov in the foregoing transcript, taken on Tuesday, December 6, 2011 was reported by me in machine shorthand and was thereafter transcribed by me; and that the foregoing transcript is a true and accurate verbatim record of the said testimony.

I further certify that I am not a relative, employee, counsel or financially involved with any of the parties to the within cause, nor am I an employee or relative of any counsel for the parties, nor am I in any way interested in the outcome of the within cause.

Signed: .....

Fiona Farson

Dated: 12/17/2011

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF FLORIDA  
3 CASE NO. 11-20427-WILLIAMS/TURNOFF

4 DISNEY ENTERPRISES,  
5 INC., TWENTIETH CENTURY  
6 FOX FILM CORPORATION,  
7 UNIVERSAL CITY STUDIOS  
8 PRODUCTIONS LLLP,  
9 COLUMBIA PICTURES  
10 INDUSTRIES, INC., and  
11 WARNER BROS.

12 ENTERTAINMENT, INC.,  
13 Plaintiff,

14 v.

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

17 Defendants.

18 HOTFILE CORP.,  
19 Counterclaimant,

20 v.

21 WARNER BROS ENTERTAINMENT  
22 INC.,

23 Counterdefendant.

24 -----  
25 VOLUME III

26 H I G H L Y C O N F I D E N T I A L  
27 (Pursuant to protective order, the following  
28 transcript has been designated highly confidential)

29 30 (b) (6) DEPOSITION OF ANTON TITOV

30 Radisson Blu Hotel

31 Sofia, Bulgaria

32 Wednesday, December 7, 2011

33 AT: 9:09 a.m.

34 Job # 44429

1 A P P E A R A N C E S

2 ATTORNEY FOR THE PLAINTIFFS:

3 JENNER & BLOCK, LLP  
4 BY: STEVEN FABRIZIO, ESQ.  
5 1099 New York Avenue, NW  
6 Washington, DC 20001  
7

8 ATTORNEY FOR THE DEFENDANTS HOTFILE CORP.,  
9 AND ANTON TITOV:

10 FARELLA, BRAUN & MARTEL, LLP  
11 BY: RODERICK THOMPSON, ESQ.  
12 235 Montgomery Street  
13 San Francisco, California 94104

14 BOSTON LAW GROUP  
15 BY: VALENTIN GURVITS  
16 825 Beacon Street  
17 Newton Center, MA 02459  
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1 Also present:

2 Court reporter:

3 Fiona Farson

TSG Reporting

4

5 Videographer:

6 Simon Rutson

TSG Reporting

7

8 Interpreter:

9 Assist. Prof. Boris Naimushin, Ph.D.

10 Elena Alexieva

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1 BY MR. FABRIZIO:

2 Q. But in the beginning he did?

3 A. I believe so.

4 Q. Okay. And you knew he was doing it at the beginning?

5 A. I think so.

6 Q. And you approved of him doing it at the beginning?

7 A. I guess I didn't say anything, so ...

8 Q. You understood he was trying to help Hotfile become more  
9 well-known and gain users, correct?

10 A. I think it was my understanding, yes.

11 Q. So you considered his activities good for Hotfile?

12 MR. THOMPSON: Objection, vague.

13 A. I don't know about all his activities but, generally,  
14 yes.

█ [REDACTED]

█ █ [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED]

█ █ [REDACTED]

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█ [REDACTED]

█ [REDACTED]

█ █ [REDACTED] [REDACTED]

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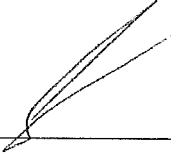
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HIGHLY CONFIDENTIAL  
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I, ANTON TITOV, hereby certify that I have read the foregoing pages of my deposition of testimony taken in these proceedings on Wednesday, December 7, 2011, and, with the exception of the changes listed on the next page and/or corrections, if any, find them to be a true and accurate transcription thereof.

Signed:   
Name: ANTON TITOV  
Date: 1/20/2012

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I further certify that I am not a relative, employee, counsel or financially involved with any of the parties to the within cause, nor am I an employee or relative of any counsel for the parties, nor am I in any way interested in the outcome of the within cause.

Signed: \_\_\_\_\_

Fiona Farson

Dated: 12-19-2011

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF FLORIDA  
3 CASE NO. 11-20427-WILLIAMS/TURNOFF

4 DISNEY ENTERPRISES,  
5 INC., TWENTIETH CENTURY  
6 FOX FILM CORPORATION,  
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10 INDUSTRIES, INC., and  
11 WARNER BROS.  
12 ENTERTAINMENT, INC.,

13 Plaintiff,

14 v.

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

17 Defendants.

18 HOTFILE CORP.,

19 Counterclaimant,

20 v.

21 WARNER BROS ENTERTAINMENT  
22 INC.,

23 Counterdefendant.

24 -----  
25 VOLUME IV

26 H I G H L Y C O N F I D E N T I A L  
27 (Pursuant to protective order, the following  
28 transcript has been designated highly confidential)

29 30(b)(6) DEPOSITION OF ANTON TITOV

30 Radisson Blu Hotel

31 Sofia, Bulgaria

32 Thursday, December 8, 2011

33 Job #44430

34 AT: 9:10 a.m.

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AND ANTON TITOV:

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By: VALENTIN GURVITS, ESQ.  
825 Beacon Street  
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1 Also present:

2 Court reporter:

3 Fiona Farson  
TSG Reporting

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5 Videographer:

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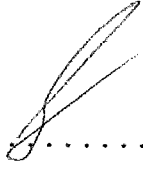
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Name: ANTON TITOV

Date: 1/20/2012 .....



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Signed: .....

Fiona Farson

Dated: 12-20-2011