

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.,

Counterdefendant.

_____ /

**DECLARATION OF JENNIFER V. YEH IN SUPPORT OF PLAINTIFFS’
OPPOSITION TO DEFENDANTS’ SECOND MOTION TO STRIKE THE
DECLARATION OF JENNIFER V. YEH**

PUBLIC REDACTED VERSION

I, Jennifer V. Yeh, declare as follows:

1. I am an attorney at the law firm of Jenner & Block LLP, and counsel to the plaintiffs Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, Universal City Studios Productions LLLP, Columbia Pictures Industries, Inc., and Warner Bros. Entertainment Inc. The statements made in this declaration are based on my personal knowledge including on information provided to me by colleagues or other personnel working under my supervision on this case. If called to testify, I would testify as follows:

2. In support of Plaintiffs' Opposition to Defendants Motion for Partial Summary Judgment, I personally supervised the preparation of, among many others, Yeh Exhibit 144. I have described the processes of creating this exhibit in greater detail in my declaration in support of plaintiffs' opposition to defendants' motion for summary judgment, dated March 7, 2012 and available publicly at Docket No. 400. (¶ 26). In addition to providing direct guidance and instruction to persons acting under my direction, I personally participated in finalizing this exhibit.

3. Attached hereto as Exhibit A is a true and correct copy of excerpts of the deposition of Lance Griffin, taken on Dec. 22, 2011 in the above-captioned case.

4. Attached hereto as Exhibit B is a true and correct copy of excerpts of the deposition of Betsy Zedek, taken on Dec. 13, 2011 in the above-captioned case.

5. Attached hereto as Exhibit C is a true and correct copy of excerpts of the deposition of David Kaplan, taken on Dec. 13, 2011 and Dec. 14, 2011 in the above-captioned case.

6. Attached hereto as Exhibit D is a true and correct copy of excerpts of the deposition of Michael Bentkover, taken on Dec. 13, 2011 in the above-captioned case.

7. Attached hereto as Exhibit E is a true and correct copy of excerpts of the deposition of [REDACTED] taken on Dec. 7, 2011 in the above-captioned case.

8. Attached hereto as Exhibit F is a true and correct copy of a document produced by defendants bearing bates label HF02855193, a translation of that document from Bulgarian to English, an affidavit certifying the accuracy of the translation from the translator's supervisor, in accordance with Transperfect's standard procedures, and the curriculum vitae of the individual who performed the translation.

9. Attached hereto as Exhibit G is a true and correct copy of a document produced by defendants bearing bates label HF02855182, a translation of that document from Bulgarian to

English, an affidavit certifying the accuracy of the translation from the translator's supervisor, in accordance with Transperfect's standard procedures, and the curriculum vitae of the individual who performed the translation.

10. Attached hereto as Exhibit H is a true and correct copy of Exhibit 5 to the deposition of [REDACTED] taken on December 7, 2011 in the above-captioned case, a translation of that document from Bulgarian to English, an affidavit certifying the accuracy of the translation from the translator's supervisor, in accordance with Transperfect's standard procedures, and the curriculum vitae of the individual who performed the translation.

11. Attached hereto as Exhibit I is a true and correct copy of a document produced by defendants bearing bates label HF00666799. This document was also produced by plaintiff Disney Enterprises, Inc. with the bates label DISNEY000288 and attached as Exhibit 147 to the Declaration of Jennifer V. Yeh in Opposition to Defendants' Motion for Summary Judgment.

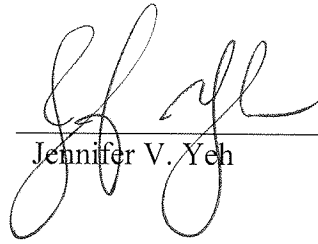
12. Attached hereto as Exhibit J is a true and correct copy of a document produced by defendants bearing bates label HF00479077. This document was also produced by plaintiff Disney Enterprises, Inc. bearing bates label DISNEY000234 and attached as Exhibit 148 to the Declaration of Jennifer V. Yeh in Opposition to Defendants' Motion for Summary Judgment.

13. Attached hereto as Exhibit K is a true and correct copy of a document produced by defendants bearing bates label HF02835646. This document was also produced by plaintiff Warner Bros. Entertainment Inc. with the bates label WARNER000001 and attached as Exhibit 150 to the Declaration of Jennifer V. Yeh in Opposition to Defendants' Motion for Summary Judgment.

14. Attached hereto as Exhibit L are true and correct copies of documents produced by Defendants in the above-captioned case bearing bates labels as indicated on the documents. These documents were also produced by plaintiffs and are included within Exhibit 141 to the Declaration of Jennifer V. Yeh in Opposition to Defendants' Motion for Summary Judgment.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 2, 2012.



Jennifer V. Yeh