

EXHIBIT B

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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,

vs.

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

Defendants.

AND RELATED CROSS-ACTION.

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER
VIDEOTAPED DEPOSITION OF BETSY ZEDEK, ESQUIRE
PURSUANT TO FEDERAL RULE 30(b)(6)
Los Angeles, California
Tuesday, December 13, 2011

Reported by:
CHERYL R. KAMALSKI
CSR No. 7113
Job No. 179149

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Videotaped Deposition of BETSY ZEDEK, ESQUIRE,
pursuant to Federal Rule 30(b)(6), taken on behalf of
Defendants and Counterclaimant, at 633 West Fifth
Street, Suite 3600, Los Angeles, California, beginning
at 9:37 a.m. and ending at 5:27 p.m. on Tuesday,
December 13, 2011, before CHERYL R. KAMALSKI, Certified
Shorthand Reporter No. 7113.

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APPEARANCES :

For Plaintiffs:

JENNER & BLOCK LLP
BY: DUANE POZZA
Attorney at Law
1099 New York Avenue, NW, Suite 900
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202.639.6000

For Defendants and Counterclaimant:

FARELLA BRAUN + MARTEL LLP
BY: JANEL THAMKUL
Attorney at Law
235 Montgomery Street
San Francisco, California 94104
415.954.4400

Also Present:

ELIZABETH VALENTINA

Videographer:

CHRIS JORDAN
SARNOFF, a Veritext Company

1 Q Does Fox outsource any content protection
2 activities to vendors?

3 A Yes.

4 Q Could you generally describe what those
5 activities are without getting into the actual
6 investigative processes?

7 A I could describe them at a high level if there
8 are not concerns about privilege there.

9 With respect to legal counsel, we retain legal
10 counsel to advise and represent us in litigation and
11 also on corporate matters or negotiations; with respect
12 to our antipiracy services vendors, we retain them to
13 search for, identify and act upon infringements.

14 Q How long has Fox been working with DtecNet?

█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]

[REDACTED]

6 Q This was marked as Exhibit 3 in a previous
7 deposition.

8 Have you seen this document before?

9 A I think so. I haven't had time to go through
10 and confirm it's what I think it is, but provided this
11 is the plaintiffs' responses and objections to Hotfile's
12 interrogatories No. 1 and 2, then, yes.

13 Q Could you please turn to page 8, the paragraph
14 with the heading "By Twentieth Century Fox Film
15 Corporation, Incorporated." I'm going to read you an
16 excerpt.

17 "Plaintiff Twentieth Century Fox
18 Film Corporation, Incorporated, became
19 aware of the existence of Hotfile at
20 the end of March 2009. An antipiracy
21 vendor that searches for infringing
22 activity on the Internet on behalf of
23 Plaintiff Twentieth Century Fox Film
24 Corporation identified infringing
25 activity on the Hotfile's website and

**BETSY ZEDEK, ESQUIRE
HIGHLY CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER**

12/13/2011

ERRATA SHEET

<u>Page/Line</u>	<u>Corrections</u>
7/6	Change from: Fox Film Corp. Change to: Twentieth Century Fox Film Corporation
8/21	Change from: Fox Film Entertainment Change to: Fox Filmed Entertainment
16/17	Change from: WebControl Change to: WebKontrol
22/4	Change from: WebControl Change to: WebKontrol
32/23	Change from: WebControl Change to: WebKontrol
44/11	Change from: audio, video Change to: audio/video
46/7	Change from: business role Change to: business rule
50/8	Change from: takedown statute describes Change to: takedown under the statute describes
109/2	Change from: owned and controlled Change to: owned or controlled
143/17	Change from: shear volume Change to: sheer volume
209/3	Change from: list may include Change to: list may also include
209/11	Change from: valuable inside Change to: valuable insight
209/11	Change from: sites of other nature Change to: sites of another nature

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I, BETSY ZEDEK, 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 12th day of February,
2012, at LOS Angeles, California.
(City) (State)



BETSY ZEDEK, ESQUIRE

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I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

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

Further, that if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript [] was [] was not requested

I further certify I am neither financially interested in the action nor a relative or employee of any attorney or any party to this action.

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

Dated: 12/22/2011

CHERYL R. KAMALSKI

CSR No. 7113