

EXHIBIT “A”

PUBLIC VERSION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 11-CIV-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.,

Counter-Defendant.

_____ /

**DECLARATION OF ANDREW LEIBNITZ IN SUPPORT OF
DEFENDANTS' REPLY BRIEF IN SUPPORT OF MOTION TO STRIKE
DECLARATION OF JENNIFER V. YEH FILED IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO DEFENDANT ANTON TITOV'S
MOTION FOR SUMMARY JUDGMENT AND DEFENDANT HOTFILE
CORPORATION'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Andrew Leibnitz, declare as follows:

1. I am an attorney at Farella Braun + Martel LLP, counsel for defendants Hotfile Corporation and Anton Titov. I have personal knowledge of the matters stated herein and, if called and sworn as a witness, I could and would competently testify to the facts set forth herein.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiffs' Responses and Objections to Defendant Hotfile Corp.'s Third Set of Interrogatories, dated December 1, 2011.

3. Attached hereto as **Exhibit 2** is a true and correct copy of *Viacom Int'l, Inc. v. YouTube, Inc.*, Case No. 10-3270 (2nd Cir. April 5, 2012), Docket No. 516-1.

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the deposition of Disney Enterprise's 30(b)(6) witness, Lance Griffin, taken December 22, 2011 in the above-captioned case.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the deposition of Warner Bros' 30(b)(6) witness, David Kaplan, taken October 12, 2011 in the above-captioned case.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the deposition of Anton Titov, taken December 5, 2011 in the above-captioned case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 9th day of April 2012, at San Francisco, California.

s/ Andrew Leibnitz

Andrew Leibnitz