

<b>FILING FEE</b>	
PAID	\$75.00
Pro hac Vice	FLS1000 17867
Steven M. Larimore, Clerk	

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 11-20427-JORDAN

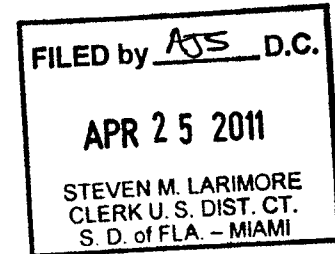
DISNEY ENTERPRISES, INC.,  
TWENTIETH CENTURY FOX FILM CORPORATION,  
UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP,  
COLUMBIA PICTURES INDUSTRIES, INC., and  
WARNER BROS. ENTERTAINMENT INC.,

*Plaintiffs,*

v.

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

*Defendants.*



**AGREED MOTION OF VAL GURVITS TO APPEAR *PRO HAC VICE*,  
CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Special Rules Governing the Admission and Practice of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Valentin Gurvits of the Boston Law Group, PC, 825 Beacon Street, Suite 20, Newton Centre, MA 02459, Telephone No.: 617.928.1804 direct, 617.928.1800 main; Telecopy No.: 617.928.1802, for purposes of appearance as co-counsel on behalf of Defendants, HOTFILE CORP and ANTON TITOV (“Defendants”), in the above-styled case only. In accordance with Rule 2B of the CM/ECF Administrative Procedures, the undersigned also moves to permit Mr. Gurvits to receive electronic filings in this case. In support of the foregoing, the undersigned states as follows:

1. Valentin Gurvits, Esquire, is not admitted to practice in the Southern District of Florida but is a member in good standing of the State Bar of Massachusetts and is admitted to practice in all courts in Massachusetts and the United States District Court for the District of Massachusetts.

2. Movant, Janet T. Munn, Esquire, of the law firm of Rasco Klock, 283 Catalonia Avenue, Suite 200, Coral Gables, Florida 33134, Telephone No.: 305. 476.7101, is a member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida, maintains an office in this State for the practice of law, and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file all documents and things that may be filed electronically, and who shall be responsible for filing documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Valentin Gurvits, Esquire, has made payment of this Court's \$75 admission fee. A certification in accordance with Rule 4(b) is attached hereto as Exhibit "A." The original certificate of good standing from the Massachusetts Bar is attached as Exhibit "B."

4. Valentin Gurvits, Esquire, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to him at the email address: [vgurvits@bostonlawgroup.com](mailto:vgurvits@bostonlawgroup.com).

WHEREFORE, Janet T. Munn, Esquire, moves this Court to enter an Order allowing Valentin Gurvits, Esquire, to appear before this Court on behalf of Defendants, HOTFILE CORP

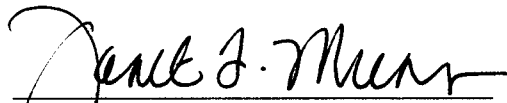
and ANTON TITOV, for all purposes relating to the proceedings in the above-styled matter, and directing the Clerk to provide notice of electronic filings to Val Gurvits, Esquire at [vgurvits@bostonlawgroup.com](mailto:vgurvits@bostonlawgroup.com). A proposed Order granting the Agreed Motion is attached to this Agreed Motion as Exhibit C and will be sent to the Court via electronic mail.

**CERTIFICATE OF GOOD FAITH CONFERENCE**

I hereby certify that Defendants' counsel conferred with all parties or non-parties who may be affected by the relief sought in this motion, including Plaintiffs' counsel, in a good faith effort to resolve the issues and Plaintiffs' counsel has agreed to the motion.

DATED: April 25, 2011

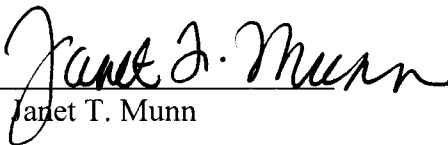
Respectfully submitted,



Janet T. Munn, Fla. Bar No. 501281  
Rasco Klock  
283 Catalonia Avenue, Suite 200  
Coral Gables, Fl 33134  
Telephone: 305.476.7101  
Telecopy: 305.476.7102  
Email: [jmunn@rascoklock.com](mailto:jmunn@rascoklock.com)  
*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 25, 2011, I filed the foregoing document with the Clerk of the Court in the conventional manner. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified below in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By:   
Jarlet T. Munn

**GRAY-ROBINSON, P.A.**

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# **EXHIBIT “A”**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 11-20427-JORDAN

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.*

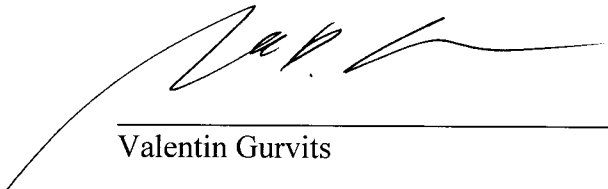
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**CERTIFICATION OF VALENTIN GURVITS**

**Valentin Gurvits, Esquire**, pursuant to Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys, hereby certifies that:

(1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; and

(2) I am a member in good standing of the Massachusetts State Bar and the United States District Court for the District of Massachusetts.

  
\_\_\_\_\_  
Valentin Gurvits

# **EXHIBIT “B”**

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **fourteenth** day of **December** A.D. **1999**, said Court being the highest Court of Record in said Commonwealth:

**Valentin David Gurvits**

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **fourteenth** day of **April**

in the year of our Lord **two thousand and eleven**



*Maura S. Doyle*  
MAURA S. DOYLE, Clerk

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.



# **EXHIBIT “C”**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 11-20427-JORDAN

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.*

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**PROPOSED ORDER GRANTING AGREED MOTION OF VAL GURVITS TO  
APPEAR *PRO HAC VICE*, CONSENT TO DESIGNATION AND REQUEST  
TO ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

THIS CAUSE having come before the Court on the Agreed Motion to Appear *Pro Hac Vice* for Val Gurvits, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing (the "Agreed Motion"), pursuant to the Special Rules Governing the Admission and Practice of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures. This Court having considered the Agreed Motion and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Agreed Motion is GRANTED. Val Gurvits may appear and participate in this action on behalf of Defendants, HOTFILE CORP. and ANTON TITOV. The Clerk shall provide

electronic notification of all electronic filings to Val Gurvits, Esquire at email address:  
vgurvits@bostonlawgroup.com.

DONE AND ORDERED in chambers in Miami, Florida this \_\_\_\_ day of April 2011.

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ADALBERTO JORDAN  
UNITED STATES DISTRICT JUDGE

Copy furnished to all Counsel of Record