

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:11-CIV-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,*

vs.

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

*Defendants.*

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**JOINT MOTION AND MEMORANDUM OF LAW OF THE PARTIES FOR  
STIPULATED EXTENSION OF TIME TO BRING DISCOVERY MOTIONS**

Plaintiffs Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, Universal City Studios Productions LLLP, Columbia Pictures Industries, Inc., and Warner Bros.

Entertainment Inc. (collectively, “Plaintiffs”) jointly with Defendants Hotfile Corporation and Anton Titov (collectively, “Defendants”) (Plaintiffs and Defendants are together the “Parties”), pursuant to Fed. R. Civ. P. 29 and the Local Rules of this Court, hereby stipulate to and jointly respectfully move for an extension of time to bring discovery motions under Local Rule 26.1(h).

The grounds supporting this Joint Motion are as follows.

**MEMORANDUM OF LAW**

Pursuant to Local Rule 26.1(h) a party is required to file discovery motions “within thirty (30) days of the occurrence of grounds for the motion.” *See* S.D. Fla. L.R., 26.1(h). Plaintiffs’ counsel and Defendants’ counsel have engaged in significant discussions to attempt to resolve

the parties' discovery issues prior to bringing motions to the Court, and both believe that the additional 30 days will assist the parties in fully attempting to reach agreement on discovery issues in this case and thereby avoid unnecessary motion practice. Therefore, the Parties jointly request that they be permitted to have sixty (60) days from the date of the occurrence of the grounds for a discovery motion to file their discovery motions in this action, rather than the customary thirty (30) days afforded under Local Rule 26.1(h).

To avoid any disruption of the Court's pre-trial and trial schedule in this case (which has not yet been set), the Parties request that this additional time for filing discovery motions apply to those discovery motions filed by the parties, to and including ninety (90) days before the commence of the trial. The Parties are respectfully proposing that any discovery motions filed after that deadline would need to comply with the Court's pre-trial and/or trial order and the Local Rule time limits.

**CONCLUSION**

On the basis of the foregoing, the Parties respectfully request that they be given an extension of time of sixty (60) days to file discovery motions in this case, as a modification of the thirty (30) day limit imposed by Local Rule 26.1(h), except for any discovery motions that would be filed less than ninety (90) days prior to the date set for trial of this action. Motions that are filed less than ninety (90) days prior to trial would be subject to the Court's pre-trial and/or trial orders and the Local Rules of this Court. A proposed Order is attached to this Joint Motion as Exhibit "A" and will also be submitted to the Court by email.

Respectfully submitted,

Dated: May 27, 2011

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