

EXHIBIT C

From: ALeibnitz@fbm.com
Sent: Tuesday, June 07, 2011 2:45 PM
To: Pozza, Duane; Fabrizio, Steven B; RThompson@fbm.com
Cc: TSchoenberg@fbm.com; Platzer, Luke C
Subject: RE: Hotfile - individuals listed in response to Interrogatory No. 1

Duane:

Please serve your discovery demands on any individuals identified in defendants' response to Interrogatory No. 1 pursuant to applicable protocols for international discovery. Hotfile hereby discloses the following contact information for the individuals identified below:

Penkov, Markov & Partners
1113, Sofia, Bulgaria,
Iztok Dstr., bl. 22, Entr. A

Please make clear that the discovery demands relate to Hotfile, and copy us. If your upcoming review of documents reveals particular individuals that you feel are needed for purposes of summary judgment briefing, please let us know.

Steve mentions possible motion practice below. We request that you please let us know what motion practice is contemplated before undertaking any such motions.

Regards,
ANDY

N. Andrew Leibnitz
Attorney at Law

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-----Original Message-----

From: Pozza, Duane [mailto:DPozza@jenner.com]
Sent: Monday, June 06, 2011 6:13 PM
To: Fabrizio, Steven B; Leibnitz, Andrew (21) x4932; Thompson, Rod (27) x4445
Cc: Schoenberg, Tony (28) x4963; Platzer, Luke C
Subject: RE: Hotfile - individuals listed in response to Interrogatory No. 1

Andy, please let us know your response to our question below regarding the witnesses listed in response to Interrogatory No. 1, at least some of whom are apparently located in Bulgaria. As Steve noted in his email yesterday, this question is particularly time-sensitive in light of your pending motion, and we need a response at the beginning of this week.

Thanks,
Duane

From: Fabrizio, Steven B
Sent: Sunday, June 05, 2011 11:13 AM
To: ALeibnitz@fbm.com; Pozza, Duane; Roderick M. Thompson
Cc: Anthony P. Schoenberg; Platzer, Luke C
Subject: Re: Hotfile - individuals listed in response to Interrogatory No. 1

Andy,

We have not made final decisions as to who we might depose and likely will only make those determinations after reviewing defendants' documents. However, without prejudice, you can assume that we would depose [REDACTED]. You can also assume that, once we have defendants' consent to voluntarily produce these witnesses in Bulgaria (assuming that is where they are reside) pursuant to the Federal Rules , we will make proper arrangements with the Bulgarian authorities so no one's sovereignty will be insulted. Having defendants' consent and stipulation undoubtedly will go a long way towards facilitating arrangements with the consulate. You can also assume that we will coordinate times with all concerned so the dates are reasonably convenience for everyone.

As for bringing the witnesses to the US, we can of course agree that we will not use their presence on US soil to serve them with process or otherwise prejudice them (much like we did when meeting Titov in Florida for our settlement conference). As for the cost issue, we'll have to check with our clients. However, for purpose of answering our questions, assume that we would reach a mutually agreeable arrangement on costs, since (despite our mutual desire to explore Bulgaria) taking these depositions in the US would save **both our clients** the expense of sending their legal teams to Bulgaria.

The process of obtaining discovery in Bulgaria, in the absence of the stipulation we are proposing, is likely going to be time consuming. If you will not agree as we have proposed (subject to the assumptions stated) we will have to move immediately to begin this process. It does seem to us that you cannot ask for motions by July 15 and then be unwilling to do what is necessary to see that we get necessary DMCA discovery without delay. Nevertheless, please let us know by the first of the week so that, in the absence of agreement, we can file whatever motions are appropriate to begin seeking the required discovery through international discovery channels.

SBF

From: Andrew Leibnitz <aleibnitz@fbm.com>
Date: Fri, 3 Jun 2011 18:25:55 -0500
To: Duane Pozza <DPozza@jenner.com>, "Roderick M. Thompson" <rthompson@fbm.com>
Cc: "Anthony P. Schoenberg" <tschoenberg@fbm.com>, Steven Fabrizio <sfabrizio@jenner.com>, Luke Platzer <LPlatzer@jenner.com>
Subject: RE: Hotfile - individuals listed in response to Interrogatory No. 1

Duane:

Who specifically would Plaintiffs like to depose? If depositions are to proceed in Bulgaria, must Plaintiffs make arrangements to conduct depositions at a consulate to avoid insulting Bulgarian sovereignty (and exposing the lawyers to criminal sanctions)? If so, when are those facilities available? Are Plaintiffs willing to pay for business class travel for witnesses and guarantee that they will not be greeted by other service of process? While I understand that you may not have all of this information at your fingertips, the more information Plaintiffs can provide, the better our clients can assess Plaintiffs' request.

Regards,
ANDY

-----Original Message-----

From: Pozza, Duane [<mailto:DPozza@jenner.com>]
Sent: Friday, June 03, 2011 2:46 PM
To: Thompson, Rod (27) x4445; Leibnitz, Andrew (21) x4932
Cc: Schoenberg, Tony (28) x4963; Fabrizio, Steven B; Platzer, Luke C
Subject: Hotfile - individuals listed in response to Interrogatory No. 1

Rod, Andy,

In addition to Anton Titov, there are a number of individuals listed in response to Interrogatory No. 1 who have worked for Hotfile Corp. and that you have indicated are located outside the country. In my meet and confer discussions with Andy and Tony, Andy has stated that defendants would not accept service of a subpoena on any of those individuals, though please let me know if I've misunderstood your position or if has changed. In any event, would defendants agree to voluntarily produce such individuals for a deposition consistent with the Federal Rules, either by bringing them into the country for a deposition in the United States, or by agreeing to produce them for a deposition in their country of origin, such that plaintiffs may timely conduct their depositions? Please let me know.

Thanks,
Duane

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