

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.

**DEFENDANT HOTFILE CORP.'S SECOND SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS**

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| PROPOUNDING PARTY: | Defendant Hotfile Corporation |
| RESPONDING PARTIES: | Plaintiffs Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, Universal City Studios Productions LLLP, Columbia Pictures Industries, Inc., and Warner Bros. Entertainment |
| SET NO.: | Two (2) |

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant Hotfile Corporation ("Hotfile") requests that Plaintiffs provide written objections and responses to these requests for production within thirty (30) days of service, and produce the documents identified below within their possession, custody, or control to Farella Braun + Martel LLP, 235 Montgomery Street, 17th Floor, San Francisco, California, 94104 within forty-five (45) days of service of this request.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 36:

All DOCUMENTS and COMMUNICATIONS between YOU and/or YOUR counsel in this litigation (or any of YOUR other agents in any context, including but not limited to anyone acting on YOUR behalf on anti-piracy matters) and any third parties that REFER or RELATE to HOTFILE, Anton Titov, Lemuria Communications, Constantin Luchian, or this litigation, including DOCUMENTS and COMMUNICATIONS exchanged between and among PLAINTIFFS and/or any other PERSON, including but not limited to Vobile, OpSec Security, MiMTiD, Inc., Peer Media Technologies, WebKontrol, Web Sherriff, BayTSP, Inc., and Youku.

REQUEST NO. 37:

All DOCUMENTS and COMMUNICATIONS that REFER or RELATE to YOUR investigations (or by any of YOUR other agents in any context, including but not limited to anyone acting on YOUR behalf on anti-piracy matters) of any file-hosting websites (including, but not limited to, Rapidshare, MegaUpload, Mediafire, etc.), including all DOCUMENTS that REFER or RELATE to YOUR strategies, tactics, techniques, procedures, processes, methods, and operations used in such investigations.

REQUEST NO. 38:

All DOCUMENTS and COMMUNICATIONS that REFER or RELATE to YOUR investigations (or by any of YOUR other agents in any context, including but not limited to anyone acting on YOUR behalf on anti-piracy matters) of HOTFILE, including all DOCUMENTS that REFER or RELATE to YOUR strategies, tactics, techniques, procedures, processes, methods, and operations used in such investigations, as well as any DOCUMENTS

related to any files removed from HOTFILE as a result of such investigations, including the removed files themselves.

REQUEST NO. 39:

All DOCUMENTS that REFER or RELATE to ANY agreements or contracts between PLAINTIFFS and their content protection agents, including but not limited to OpSec Security, MiMTiD, Inc., Peer Media Technologies, WebKontrol, Web Sherriff, BayTSP, Inc., and DtecNet (or any of YOUR other agents acting on YOUR behalf on anti-piracy matters).

REQUEST NO. 40:

All DOCUMENTS that YOU have or YOUR counsel has received in response to a subpoena in this litigation.

REQUEST NO. 41:

All COMMUNICATIONS that RELATE to any subpoenas YOU issued in this litigation.

REQUEST NO. 42:

All settlement or license agreements from other litigation in which ANY or ALL PLAINTIFFS alleged secondary liability for copyright infringement against an Internet website.

REQUEST NO. 43:

All DOCUMENTS and COMMUNICATIONS that REFER or RELATE to the UGC PRINCIPLES.

REQUEST NO. 44:

All DOCUMENTS and COMMUNICATIONS with YOU and any of YOUR agents in any context, including but not limited to anyone acting on YOUR behalf on anti-piracy matters, that REFER or RELATE to HOTFILE.