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9 Attorneys for Plaintiff  
 SONY COMPUTER ENTERTAINMENT AMERICA LLC

10  
 11 UNITED STATES DISTRICT COURT  
 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN FRANCISCO DIVISION

14 SONY COMPUTER ENTERTAINMENT  
 AMERICA LLC,  
 15  
 Plaintiff,  
 16  
 v.  
 17  
 GEORGE HOTZ; HECTOR MARTIN  
 18 CANTERO; SVEN PETER; and DOES  
 1 through 100,  
 19  
 Defendants.

Case No. CV11-0167 SI

**DECLARATION OF HOLLY  
 GAUDREAU IN SUPPORT OF  
 ADMINISTRATIVE MOTION TO FILE  
 UNDER SEAL EXHIBITS B AND D  
 TO SUPPLEMENTAL  
 DECLARATION OF RYAN BRICKER  
 REGARDING DEFENDANT HOTZ  
 AND THIRD PARTIES' ACTIVITY  
 AFTER RECEIVING NOTICE OF  
 LAWSUIT IN SUPPORT OF  
 PLAINTIFF'S EX PARTE MOTION  
 FOR TEMPORARY RESTRAINING  
 ORDER**

Date: January 13, 2011  
 Time: 9:00am, or as soon  
 as can be heard  
 Courtroom: 10, 19th Floor  
 Judge: Hon. Susan Illston

25  
 26 I, Holly Gaudreau, declare as follows:

27 1. I am an attorney in the law firm of Kilpatrick Townsend & Stockton LLP, counsel  
 28 of record for plaintiff Sony Computer Entertainment America LLC ("SCEA") in the above-

1 captioned matter. I make this declaration on personal knowledge and if called as a witness  
2 could and would testify competently thereto.

3 2. SCEA seeks to file under seal Exhibits B and D to Supplemental Declaration of  
4 Ryan Bricker Regarding Defendant Hotz and Third Parties' Activity After Receiving Notice of  
5 Lawsuit In Support of Plaintiff's *Ex Parte* Motion For Temporary Restraining Order.

6 3. The above referenced exhibits to the Bricker Declaration contain hyperlinks for  
7 downloading circumvention devices and instructions on how to circumvent the technological  
8 protection measures ("TPMs") in SCEA's PlayStation®3 computer entertainment system  
9 ("PS3 System").

10 4. SCEA has brought this action to put an end to Defendants' illegal circumvention  
11 of these TPMs in its PS3 System. SCEA, therefore, does not want the means of such  
12 circumvention – the very practice it is aiming to stop – to be a matter of public record, thereby  
13 making the information further available and enabling others to engage in this illegal practice.

14 5. SCEA's request is narrowly tailored to seal only those materials for which good  
15 cause to seal has been established.

16 6. I contacted counsel for Defendant Hotz on January 12, 2011, in anticipation of  
17 filing this motion, seeking a stipulation to lodge Exhibits B and D under seal pursuant to Local  
18 Rule 7-11(a). A stipulation could not be obtained because counsel declined.

19 I declare under penalty of perjury under the laws of the United States that the  
20 foregoing is true and correct to the best of my knowledge and belief.

21 Executed on January 12, 2011, at San Francisco, California.

22  
23 /s/ Holly Gaudreau  
24 Holly Gaudreau

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