

1 LUANNE SACKS, Bar No. 120811
 luanne.sacks@dlapiper.com
 2 CARTER W. OTT, Bar No. 221660
 carter.ott@dlapiper.com
 3 **DLA PIPER LLP (US)**
 555 Mission Street, Suite 2400
 4 San Francisco, CA 94105
 Tel: 415.836.2500
 5 Fax: 415.836.2501

6 Attorneys for Defendant
 SONY COMPUTER ENTERTAINMENT
 7 AMERICA LLC (erroneously sued as “Sony
 Computer Entertainment America Inc.”)
 8

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

13 In re SONY PS3 “OTHER OS”
 14 LITIGATION

CASE NO. 3:10-CV-01811 RS (EMC)

**DEFENDANT’S ADMINISTRATIVE
 MOTION TO REMOVE INCORRECTLY
 FILED DOCUMENTS; DOCKET NO. 130**

Judge: Hon. Richard Seeborg
 Courtroom: 3

1 Pursuant to Local Rule 7-11, defendant Sony Computer Entertainment America LLC
2 (“SCEA”) submits this Administrative Motion to Remove Incorrectly Filed Documents,
3 submitted as Exhibits I and J to the Declaration of Carter Ott in Support of Opposition to Motion
4 to Compel and Motion for Protective Order (Docket #130). Pursuant to Local Rule 79-5(b),
5 counsel inadvertently included Exhibit I and J in the public version of the filed copy of the
6 declaration. These exhibits should have been lodged under seal. *See* Declaration of Carter Ott
7 ISO Administrative Motions to File Under Seal and Remove Incorrectly Filed Documents. In
8 fact, after discovering the error, counsel called the ECF Help Desk and put a temporary lock on
9 the documents.

10 These documents are the subject of an Administrative Motion to File Under Seal, filed
11 herewith. And the basis for sealing, set forth more fully in that motion, also support removing the
12 declaration from the docket: Exhibits I and J contain explicit instructions on how to circumvent
13 the Technological Protection Measures (“TPMs”) in the PlayStation®3 game console (the
14 “PS3”), and SCEA has initiated a lawsuit in this District titled *Sony Computer Entertainment*
15 *America LLC v. George Hotz et al.* (Case No. CV11-0167-SI) to halt such illegal conduct. SCEA
16 does not want the means of such circumvention – the very practice it is aiming to stop in that
17 action – to be a matter of public record, thereby making the information further available and
18 enabling others to engage in this illegal practice. In addition, SCEA’s request is narrowly tailored
19 to seal only those materials for which good cause to seal has been established, and Judge Susan
20 Illston has already granted a similar request in the *Hotz* action. Furthermore, Plaintiffs’ counsel

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1 have stated that they do not oppose this request. Declaration of Carter Ott ISO Administrative
2 Motions to File Under Seal and Remove Incorrectly Filed Documents, ¶¶ 3-4.

3 Accordingly, SCEA respectfully requests that Docket Number 130 be permanently deleted
4 from the docket.

5 Dated: February 7, 2011

6 DLA PIPER LLP (US)

7
8 By: /s/ Carter Ott

CARTER W. OTT

Attorneys for Defendant

SONY COMPUTER ENTERTAINMENT

AMERICA LLC