EXHIBIT B

DECLARATION OF RYAN BRICKER IN SUPPORT OF
PLAINTIFF SONY COMPUTER ENTERTAINMENT AMERICA
LLC'S OPPOSITION TO DEFENDANT GEORGE HOTZ'S
MOTION TO DISMISS FOR LACK OF PERSONAL
JURISDICTION AND IMPROPER VENUE

Bricker, Ryan

From: Gaudreau, Holly

Sent: Saturday, February 26, 2011 11:20 AM

To: 'Stewart Kellar'

Cc: Boroumand Smith, Mehrnaz

Subject: RE: Sony v. Hotz, Gaudreau correspondence

Dear Stewart,

We disagree with your statements below as already set forth in my letter of February 24, 2011. With respect to the inspection demand, we are prepared to arrange for inspection of your client's PS3 System consoles to take place in New Jersey or New York. Please advise how many consoles are in your client's possession, custody or control so appropriate arrangements can be made. We need to conduct the inspection by March 7, 2011.

With respect to the interrogatories and requests for production, if Mr. Hotz is unable to respond by March 7, 2011, SCEA is willing to enter into a stipulation to extend the response deadline, but only if the parties can agree on a revised briefing schedule and hearing date on Mr. Hotz's motion to dismiss, and the Court enters that stipulation. As with our prior stipulation, any new stipulation must take into account that SCEA will need sufficient time to review the discovery provided by Mr. Hotz and evaluate whether his deposition should be taken.

Toward that end, please prepare a draft stipulation and proposed order for our consideration.

Thanks. Holly

Holly Gaudreau

Kilpatrick Townsend & Stockton LLP
Eighth Floor | Two Embarcadero Center | San Francisco, CA 94111
office 415 273 4324 | fax 415 354 3443
hgaudreau@kilpatricktownsend.com | My Profile | VCard

From: Stewart Kellar [mailto:stewart@etrny.com] **Sent:** Thursday, February 24, 2011 5:53 PM

To: Gaudreau, Holly

Subject: Re: Sony v. Hotz, Gaudreau correspondence

Hello Ms. Gaudreau,

In response to your PDF letter, I have received your incorrectly characterized "courtesy copies" of the new discovery requests, which represents the first time I have received these updated discovery documents. My claims that you were to serve me with updated discovery papers, which you had not done until today (February 24, 2011), have merit.

In our phone conversation, you stated that the newly stipulated discovery points contained in the letter to Judge Spero, plus the invalidated discovery requests that were delivered in early February, serves as valid new discovery requests that I am to answer by March 7, leaving just over one week from the date of my phone call to respond. You then sent me inappropriately named "courtesy copies" of the new

discovery. This indicates that you did in fact have updated discovery requests available to deliver to me yet you did not do so until today, February 24, 2011.

It is not proper nor feasible that you expected the responding party to create new discovery documents using the previously invalidated original discovery requests and the bullet points of alterations to that discovery. The invalidated discovery was delivered to me in PDF form which is not possible to alter. Therefore, until late this morning, I was not in possession of the new discovery documents. In fact, your new demand for inspection does not reflect our agreement as it states that the inspected items are to be received and inspected at your office in San Francisco which is contrary to our agreement that the items would bre received and inspected in New Jersey or New York and arrangements to pick up the items for inspection from Mr. Hotz's residence would be made.

I regret we have to write these letters and emails to "preserve a record" and would have liked to settle this matter in a direct good faith dialog to reach a reasonable agreement. However, because I have not received the discovery documents until almost two weeks after we agreed on their contents, and because you will not agree to push back the time for discovery responses in kind, I can no longer agree that all discovery requests will be completed by March 7.

Stewart Kellar E-ttorney at LawTM 148 Townsend St. Ste. 2 San Francisco, CA 94107 (415) 742-2303 stewart@etrny.com www.ettorneyatlaw.com

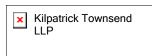
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On Thu, Feb 24, 2011 at 11:10 AM, Casillas, Esther < ecasillas@kilpatricktownsend.com> wrote: Dear Mr. Kellar,

Attached find Ms. Gaudreau's letter dated February 24, 2011 with attachments.

If you have any questions, please contact Ms. Gaudreau directly at 415-273-4324.

Thank you.



Esther Casillas Legal Secretary

Kilpatrick Townsend & Stockton LLP

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