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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. 11-cv-00167 SI

**DECLARATION OF JENNIFER LIU
 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**

Date: April 8, 2011
 Time: 9:00 a.m.
 Courtroom: 10, 19th Floor
 Judge: Hon. Susan Illston

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 22 I, Jennifer Liu, declare as follows:

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 24 1. I am an employee of Sony Computer Entertainment America LLC ("SCEA"), and
 25 work at SCEA's headquarters in Foster City, California. My title at SCEA is Vice President
 26 and Deputy General Counsel of Business and Legal Affairs. I make this declaration on
 27 personal knowledge and if called as a witness could and would testify competently thereto.
 28

1 2. SCEA's headquarters and principal place of business is at 919 East Hillsdale
2 Boulevard, Foster City, California, 94404. SCEA conducts the vast majority of its business
3 activities in California. All of SCEA's business units, including marketing, research and
4 development, financial, and consumer service departments are located in Foster City, CA.

5 3. SCEA is the exclusive distributor of the PlayStation®3 computer entertainment
6 system ("PS3 System") in the United States. SCEA's activities relating to the marketing, sale
7 and distribution of the PS3 System in the United States are based out of Foster City, CA.

8 4. The PS3 System also features PlayStation® Network ("PSN"), an entertainment
9 network that supports multiplayer online gameplay, access to the PlayStation Store, and PS3
10 System connectivity. SCEA's activities related to the PSN are based out of Foster City, CA.

11 5. SCEA contracts to manage the servers that host the PSN for customers in the
12 United States. These servers are located in San Diego. Accordingly, when a user in the
13 United States logs onto the PSN to create or access an account or to purchase PlayStation
14 content, the user will normally be connected to a server located in California.

15 6. SCEA also creates video games and other original content for the PS3 or PSN.
16 Most of SCEA's activities relating to the creation of these video games or other original content
17 is conducted in Foster City or other SCEA studios in California (such as Santa Monica or San
18 Diego). Further, several game servers that host online multiplayer video games created by
19 SCEA are located in San Diego and Santa Monica, California.

20 7. SCEA's consumer service department is based in Foster City, CA. The
21 consumer service personnel located in Foster City, CA are the individuals responsible for
22 operation of all of SCEA's consumer services call centers and resolution of escalated
23 questions or complaints from consumers within SCEA's distribution territory.

24 I declare under penalty of perjury under the laws of the United States that the
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1 foregoing is true and correct to the best of my knowledge and belief.
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3 Executed on March 18, 2011, at Foster City, California.
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6 Jennifer Liu

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