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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  
 19 1 through 100,

20 Defendants.

Case No. 11-cv-00167 SI

**DECLARATION OF ANDREW  
 PIERCE 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, 19<sup>th</sup> Floor  
 Judge: Hon. Susan Illston

21  
 22  
 23  
 24 I, Andrew Pierce, declare as follows:

25 1. I am a Project Manager at eLitigation Solutions ("eLit"), an agent for counsel of  
 26 record for plaintiff Sony Computer Entertainment America LLC ("SCEA") in the above-  
 27 captioned matter. The relationship between eLit and Kilpatrick Townsend & Stockton  
 28 ("Kilpatrick Townsend") is governed by a mutual nondisclosure agreement to provide

DECLARATION OF ANDREW PIERCE 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 - CASE NO. 11-cv-000167 SI

1 eDiscovery and project support upon request. I make this declaration on personal knowledge  
2 and if called as a witness could and would testify competently thereto.

3 2. On Friday March 11, 2011, eLit was contracted to perform a technical analysis  
4 of raw data of weblogs provided by BlueHost, Inc. Specifically, we were asked to isolate log  
5 entries that listed <geohot.com> or a subdomain and included the "GET /jailbreak.zip"  
6 download command. We also parsed out the IP addresses from those log entries and  
7 determined the geographical source or location of those IP addresses using an IP location  
8 tracing service, IP2Location (the "IP2Location software"). The IP2Location software that we  
9 used did not provide *any* identifying information beyond the general geographic source (e.g.  
10 city, state); that is, the service did not identify any individuals by name, physical address, or  
11 phone number.

12 3. After providing a spreadsheet encompassing all log entries from all of  
13 BlueHost's provided data, we re-processed the data to eliminate duplicative IP addresses so  
14 that the report would render only unique IP addresses. If multiple instances of an IP address  
15 were encountered, the earliest occurrence was retained in the spreadsheet.

16 4. After providing a report that eliminated duplicative IP addresses, we re-  
17 organized the data to demonstrate the number of unique IP addresses during three specific  
18 timeframes: (1) January 8 – 12, 2011; (2) January 13 – 27, 2011; and (3) January 28 - March  
19 7, 2011.

20 5. After organizing the unique IP address data into three specific timeframes, we  
21 re-processed the data again to parse out HTTP codes (e.g. 404, 200, 206) which indicate  
22 whether or not the "GET /jailbreak.zip" download command was successful. We updated our  
23 report with this information.

24 6. All reports and other deliverables discussed in ¶¶ 2-5 above were formatted as  
25 Excel 2007 workbooks. Attached hereto as Exhibit A is a true and correct copy of one  
26 sample page from the final report, identifying the geographic location of the IP addresses that  
27 executed the "GET /jailbreak.zip" download command at <www.geohot.com>, the date on  
28 which each of those unique IP addresses executed the "GET /jailbreak.zip" download

1 command, and the HTTP code indicating whether the "GET /jailbreak.zip" download  
2 command was successful. This page was sorted to show downloads or download attempts in  
3 California and for privacy reasons, IP addresses have been redacted. The exhibit is **Highly**  
4 **Confidential** and is **Filed Under Seal**.

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

7 Executed on March 18, 2011, at Palo Alto, California.

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9 \_\_\_\_\_  
10 Andrew Pierce, Project Manager

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# **EXHIBIT A**

DECLARATION OF ANDREW PIERCE 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

**FILED UNDER SEAL**