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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.
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21

Case No. 11-cv-00167 SI

**ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBIT A TO
DECLARATION OF ANDREW PIERCE;
EXHIBITS A AND B TO DECLARATION OF
KENNETH LAW; AND EXHIBITS H, L, M,
N, P AND T TO 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**

22 Date: April 8, 2011
23 Time: 9:00 a.m.
Courtroom: 10, 19th Floor
24 Judge: Hon. Susan Illston
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1 Pursuant to Local Rules 7-11 and 79-5, Plaintiff Sony Computer Entertainment
2 America LLC (“SCEA”) submits this Administrative Motion to file under seal Exhibit A to the
3 Declaration of Andrew Pierce, Exhibits A and B to the Declaration of Kenneth Law and
4 Exhibits H, L, M, N and T to the Declaration of Ryan Bricker In Support of Plaintiff’s
5 Opposition to Defendant’s Motion to Dismiss for Lack of Personal Jurisdiction and Improper
6 Venue. Pursuant to Local Rule 79-5 (c) (3), SCEA is lodging with the Clerk a copy of these
7 documents for filing under seal. This motion is supported by the Declaration of Holly
8 Gaudreau (“Gaudreau Decl.”) filed concurrently herein.

9 Exhibit A to the Andrew Pierce Declaration contains IP addresses that should not be
10 made public record in order to protect the privacy of individuals associated with those IP
11 addresses. Gaudreau Decl., ¶2.

12 Exhibits A and B to the Kenneth Law Declaration are internal SCEA reports that
13 provide identifying information and other confidential details – including the IP address and
14 corresponding geographic location – that correspond to a particular PlayStation®3
15 computer entertainment system (“PS3 System”) and PlayStation® Network (“PSN”)
16 account. The documents should not be made public record in order to protect the privacy of
17 the individual associated with the console and account. *Id.* at ¶3.

18 Exhibits H, L, M, N, P and T to the Ryan Bricker Declaration reproduce
19 circumvention devices, a part thereof, and/or proprietary information related to devices that
20 circumvent the technological protection measures (“TPMs”) in SCEA’s PS3 System. SCEA
21 brought this action to put an end to the illegal circumvention of these TPMs in its PS3
22 System. SCEA, therefore, does not want the means of such circumvention – the very
23 practice it is aiming to stop – to be a matter of public record, thereby making the information
24 further available and enabling others to engage in this illegal practice. *Id.* at ¶4.

25 SCEA’s request is narrowly tailored to seal only those materials for which good
26 cause to seal has been established. *Id.* at ¶5. Accordingly, SCEA respectfully requests
27 that the Court grant its Administrative Motion to file Exhibit A to the Declaration of Andrew
28 Pierce, Exhibits A and B to the Declaration of Kenneth Law and Exhibits H, L, M, N, P and T

1 to the Declaration of Ryan Bricker under seal.

2 Respectfully submitted,

3 KILPATRICK TOWNSEND & STOCKTON LLP

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5 By: /s/ Holly Gaudreau

6 Holly Gaudreau

7 Attorneys for Plaintiff

8 SONY COMPUTER ENTERTAINMENT AMERICA LLC

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