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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 HOLLY GAUDREAU
 IN SUPPORT OF 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 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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 26 I, Holly Gaudreau, declare as follows:

27 1. I am an attorney in the law firm of Kilpatrick Townsend & Stockton LLP, counsel
 28 of record for plaintiff Sony Computer Entertainment America LLC ("SCEA") in the above-

1 captioned matter. I make this declaration on personal knowledge and if called as a witness
 2 could and would testify competently thereto.

3 2. Exhibit A to the Andrew Pierce Declaration contains IP addresses that should
 4 not be made public record in order to protect the privacy of individuals associated with those
 5 IP addresses.

6 3. Exhibits A and B to the Kenneth Law Declaration are internal SCEA reports that
 7 provide identifying information and other confidential details – including the IP address and
 8 corresponding geographic location – that correspond to a particular PlayStation®3 computer
 9 entertainment system (“PS3 System”) and PlayStation® Network (“PSN”) account. The
 10 documents should not be made public record in order to protect the privacy of the individual
 11 associated with the console and account.

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

19 5. SCEA’s request is narrowly tailored to seal only those materials for which good
 20 cause to seal has been established.

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

23 Executed on March 18, 2011, at San Francisco, California.

24
 25 /s/ Holly Gaudreau
 26 Holly Gaudreau

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