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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.
20

Case No. CV11-0167 SI

**ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS B AND D TO
SUPPLEMENTAL DECLARATION OF
RYAN BRICKER REGARDING
DEFENDANT HOTZ AND THIRD
PARTIES' ACTIVITY AFTER
RECEIVING NOTICE OF LAWSUIT IN
SUPPORT OF PLAINTIFF'S EX
PARTE MOTION FOR TEMPORARY
RESTRAINING ORDER**

21 Date: January 13, 2011
Time: 9:00am, or as soon as
can be heard
22 Courtroom: 10, 19th Floor
23 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 Exhibits B and
3 D to Supplemental Declaration of Ryan Bricker Regarding Defendant Hotz and Third
4 Parties’ Activity After Receiving Notice of Lawsuit In Support of Plaintiff’s *Ex Parte* Motion
5 For Temporary Restraining Order. Pursuant to Local Rule 79-5 (c) (3), SCEA is lodging
6 with the Clerk a copy of these documents for filing under seal. This motion is supported by
7 the Declaration of Holly Gaudreau (“Gaudreau Decl.”) filed concurrently herein.

8 The above referenced exhibits to the Bricker Declaration contain download
9 hyperlinks corresponding to circumvention devices and/or instructions on how to circumvent
10 the technological protection measures (“TPMs”) in SCEA’s PlayStation®3 computer
11 entertainment system (“PS3 System”). Gaudreau Decl. at ¶3.

12 SCEA has brought this action to put an end to Defendants’ illegal circumvention of
13 these TPMs in its PS3 System. SCEA, therefore, does not want the means of such
14 circumvention – the very practice it is aiming to stop – to be a matter of public record,
15 thereby making the information further available and enabling others to engage in this illegal
16 practice. *Id.* at ¶4. SCEA’s request is narrowly tailored to seal only those materials for
17 which good cause to seal has been established. *Id.* at ¶5.

18 Accordingly, SCEA respectfully requests that the Court grant its Administrative
19 Motion to file the aforementioned exhibits under seal.

20 DATED: January 12, 2011

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON LLP

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23 By: /s/ Holly Gaudreau.

Holly Gaudreau

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25 Attorneys for Plaintiff
26 SONY COMPUTER ENTERTAINMENT AMERICA LLC

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