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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, a Delaware limited liability
 15 company,

16 Plaintiff,

17 v.

18 GEORGE HOTZ; HECTOR MARTIN
 CANTERO; SVEN PETER; and DOES 1 through
 19 100,

20 Defendants.

CASE NO. CV11-0167 SI

**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**

Date: January 13, 2011
 Time: 9:00 a.m., or as soon as can be
 heard
 Courtroom: 10, 19th Floor
 Judge: Hon. Susan Illston

1 I, Ryan Bricker, declare:

2 1. I am an associate at Kilpatrick Townsend & Stockton LLP, counsel of record for
3 Sony Computer Entertainment America LLC (“SCEA”) in the above-captioned matter. I have
4 personal knowledge of the facts stated in this declaration, unless otherwise indicated, and
5 could and would testify competently thereto.

6 2. Shortly after receiving actual notice of SCEA’s *Ex Parte* Motion for Temporary
7 Restraining Order and Order to Show Cause Re: Preliminary Injunction, Order of
8 Impoundment, and Proposed Order (“SCEA’s Motion for TRO”), Defendant George Hotz
9 removed the circumvention devices from his website, including the Metldr Keys text, and
10 links to the 3.55 Firmware Jailbreak and Signing Tools. A true and correct copy of his
11 website, visited at 6:53PM PST, January 11, 2011, is attached hereto as Exhibit A.

12 3. A few hours later, Hotz re-posted the Metldr Keys text, and links to the 3.55
13 Firmware Jailbreak and Signing Tools. A true and correct copy of his website, visited at
14 8:14PM PST, January 11, 2011, is attached hereto as Exhibit B, along with a screen capture
15 verifying that the links are active, and the 3.55 Firmware Jailbreak and Signing Tools can be
16 downloaded.

17 4. A forum post at <www.ps3news.com> reproduced comments made by Hotz
18 through an “Internet Relay Chat” (“IRC”) forum on January 11, 2011, including the following
19 statements, regarding relocation to Spain and re-posting the circumvention devices:

20 geohot: moving to spain :P
21 geohot: old index page and jailbreak.zip has been restored to geohot.com

22
23 A true and correct copy of that post is attached hereto as Exhibit C.

24 5. On January 12, 2011, users of several online forums that discuss hacking the
25 PlayStation® 3 System (“PS3 System”) posted links to and “mirrors” of repositories
26 containing all circumvention devices discussed in SCEA’s Motion for TRO, including all
27 circumvention devices (*i.e.*, code, keys, software tools, and/or programs) distributed by Hotz

1 and the FAIL0VERFLOW Defendants, and all SCEA security and encryption “Keys.” One
2 such repository containing all circumvention devices distributed by the FAIL0VERFLOW
3 Defendants was created by third party hacker “Hermes.” Users posted links to these
4 repositories in connection with comments such as “Its a response of [sic] sony measures”,
5 and “Hermes is asking for our cooperation, . . . the idea is to clone the repository many times
6 so that the failoverfl0w tools [sic] to reach more developers, we can all work together cloning
7 the repository.” True and correct copies of the “Hermes” repository, and a page at
8 <www.psx-scene.com> discussing this distribution of circumvention devices are attached
9 hereto as Exhibit D.

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11 I declare under penalty of perjury on this date under the laws of the United States in
12 San Francisco, California that the foregoing is true and correct.

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14 DATED: January 12 2011

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/s/ Ryan Bricker
Ryan Bricker