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SONY COMPUTER ENTERTAINMENT AMERICA LLC

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SONY COMPUTER ENTERTAINMENT  
AMERICA LLC,

Plaintiff,

v.

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

Defendants.

Case No. 11-cv-00167 SI

**DECLARATION OF HOLLY  
GAUDREAU IN SUPPORT OF  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL EXHIBITS T AND X  
TO DECLARATION OF RYAN  
BRICKER IN SUPPORT OF *EX  
PARTE* MOTION FOR TEMPORARY  
RESTRAINING ORDER AND ORDER  
TO SHOW CAUSE RE  
PRELIMINARY INJUNCTION;  
ORDER OF IMPOUNDMENT**

Date:

Time:

Courtroom: 10, 19<sup>th</sup> Floor

Judge: Hon. Susan Illston

I, Holly Gaudreau, declare as follows:

1. I am an attorney in the law firm of Kilpatrick Townsend & Stockton LLP, counsel of record for plaintiff Sony Computer Entertainment America LLC ("SCEA") in the above-captioned matter. I make this declaration on personal knowledge and if called as a witness

1 could and would testify competently thereto.

2 2. On January 11, 2011, SCEA filed an Administrative Motion to File Under Seal  
3 Exhibits D, G, U, V, W, Y, and CC to the Bricker Declaration. However, Exhibits T and X to  
4 the Bricker Declaration were inadvertently omitted from that filing.

5 3. Like Exhibits D, G, U, V, W, Y and CC, Exhibits T and X contain explicit  
6 instructions on how to circumvent the technological protection measures ("TPMs") in SCEA's  
7 PlayStation®3 computer entertainment system ("PS3 System").

8 4. SCEA has brought this action to put an end to Defendants' illegal circumvention  
9 of these TPMs in its PS3 System. SCEA, therefore, does not want the means of such  
10 circumvention – the very practice it is aiming to stop – to be a matter of public record, thereby  
11 making the information further available and enabling others to engage in this illegal practice.

12 5. SCEA's request is narrowly tailored to seal only those materials for which good  
13 cause to seal has been established.

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

16 Executed on January 13, 2011, at San Francisco, California.

17  
18 /s/Holly Gaudreau  
19 Holly Gaudreau

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