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1 2 3 4 5 6 7 8	KILPATRICK TOWNSEND & STOCKTON JAMES G. GILLILAND, JR. (State Bar No. TIMOTHY R. CAHN (State Bar No. 162136 MEHRNAZ BOROUMAND SMITH (State B HOLLY GAUDREAU (State Bar No. 20911 RYAN BRICKER (State Bar No. 269100) Two Embarcadero Center Eighth Floor San Francisco, CA 94111 Telephone: (415) 576-0200 Facsimile: (415) 576-0300 Email: jgilliland@kilpatricktownsend.com tcahn@kilpatricktownsend.com mboroumand@kilpatricktownsend.com rbricker@kilpatricktownsend.com	107988) 6) 3ar No. 197271) 4)	
9	Attorneys for Plaintiff SONY COMPUTER ENTERTAINMENT AMERICA LLC		
11	UNITED STATES DISTRICT COURT		
12	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
13	SAN FRANCISCO DIVISION		
14	SONY COMPUTER ENTERTAINMENT AMERICA LLC,	Case No. 11-cv-00167 SI	
15 16 17 18 19 20 21 22 23	Plaintiff, v. GEORGE HOTZ; HECTOR MARTIN CANTERO; SVEN PETER; and DOES 1 through 100, Defendants.	DECLARATION OF HOLLY GAUDREAU IN SUPPORT OF PLAINTIFF'S MOTION TO REMOVE INCORRECTLY FILED DOCUMENTS; DOCKET NUMBER [4] Date: Time: Courtroom: 10, 19 th Floor Judge: Hon. Susan Illston	
24			
25	I, Holly Gaudreau, declare as follows:		
26	 I am an attorney in the law firm of Kilpatrick Townsend & Stockton LLP, counse 		
27	of record for plaintiff Sony Computer Entertainment America LLC ("SCEA") in the above-		
28	captioned matter. I make this declaration on personal knowledge and if called as a witness		

could and would testify competently thereto.

- 2. Pursuant to Local Rule 79-5 (b), counsel inadvertently included Exhibits T and X in the public version of the filed copy of the declaration. Exhibits T and X should have been lodged under seal.
- 3. After discovering the error, counsel called the ECF Help Desk and put a temporary lock on the document. Similar to the other documents that SCEA has lodged under seal, Exhibits T and X contain explicit instructions on how to circumvent the technological protection measures in SCEA's PlayStation®3 ("PS3") computer entertainment system ("PS3 System").
- 4. SCEA has brought this action to put an end to Defendants' illegal circumvention of these TPMs in its PS3 System. SCEA, therefore, does not want the means of such circumvention the very practice it is aiming to stop to be a matter of public record, thereby making the information further available and enabling others to engage in this illegal practice. *Id.* at ¶4. SCEA's request is narrowly tailored to seal only those materials for which good cause to seal has been established.

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

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

/s/Holly Gaudreau	
Holly Gaudreau	

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