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SONY COMPUTER ENTERTAINMENT AMERICA LLC

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

E-filing

FILED
2011 JAN 11 P 2:57
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JCS

CV 11 0167

SONY COMPUTER ENTERTAINMENT
AMERICA LLC,

Plaintiff,

v.

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

Defendants.

Case No.

**ADMINISTRATIVE MOTION TO FILE
EXHIBITS D, G, U, V, W, Y, AND CC
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:
Judge:

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 D, G,
3 U, V, W, Y and CC to Declaration of Ryan Bricker In Support of *Ex Parte* Motion for
4 Temporary Restraining Order And Order To Show Cause Re Preliminary Injunction; Order
5 of Impoundment. Pursuant to Local Rule 79-5 (c) (3), SCEA is lodging with the Clerk a
6 copy of these documents for filing under seal. This motion is supported by the Declaration
7 of Holly Gaudreau ("Gaudreau Decl.") filed concurrently herein.

8 The above referenced exhibits to the Bricker Declaration contain explicit instructions
9 on how to circumvent the technological protection measures ("TPMs") in SCEA's
10 PlayStation®3 computer entertainment system ("PS3 System"). Gaudreau Decl., ¶3.

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

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

19 DATED: January 11, 2011

Respectfully submitted,

20 KILPATRICK TOWNSEND & STOCKTON LLP

21 By: 

22 JAMES G. GILLILAND, JR.
23 TIMOTHY R. CAHN
24 MEHRNAZ BOROUMAND SMITH
25 HOLLY GAUDREAU
26 RYAN BRICKER

27 Attorneys for Plaintiff
28 SONY COMPUTER ENTERTAINMENT AMERICA LLC

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