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4 Attorney for Defendant
 5 GEORGE HOTZ

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 8 **UNITED STATES DISTRICT COURT**
 9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 10 **SAN FRANCISCO DIVISION**

11 SONY COMPUTER ENTERTAINMENT
 12 AMERICA LLC, a Delaware limited
 liability company,

13 Plaintiff,

14 v.

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

17 Defendants.
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CASE No.: 3:11-cv-00167

**SECOND DECLARATION OF
 STEWART KELLAR IN SUPPORT OF
 MOTION TO DIMISS FOR LACK OF
 PERSONAL JURISDICTION AND
 IMPROPER VENUE**

1 I, Stewart Kellar, declare:

2 1. I am counsel of record for Mr. George Hotz in the above-captioned matter. I have
3 personal knowledge of the facts stated in this declaration, unless otherwise indicated, and
4 could and would testify competently thereto.

5 2. Attached hereto as Exhibit A is a true and correct copy of corporate information
6 published at <<http://www.scei.co.jp>> and accessed on 2/2/2011 entitled "Company Profile." The
7 document states the company is located at 1-7-1 Konan, Minato-ku, Tokyo, 108-0075 Japan.

8 3. Attached hereto as Exhibit B is a true and correct copy of WhoIs information for
9 <playstation.net> accessed on 2/2/2011 at <[http://www.networksolutions.com/whois-
10 search/playstation.net](http://www.networksolutions.com/whois-search/playstation.net)>. The WhoIs information shows that the registrant, for <playstation.net>
11 is Sony Computer Entertainment Inc., Akasaka 7-1-1 Aoyamayasuda Bldg., Minato-ku, Tokyo
12 107-0052, Japan. The WhoIs information shows that the administrative and technical contact for
13 <playstation.net> is domain-admin@scei.co.jp, Sony Computer Entertainment Inc., 2-6-21,
14 Minami-Aoyama, Minato-ku, Tokyo 107-0062, Japan.

15 4. Attached hereto as Exhibit C is a true and correct copy of an article published at
16 <cnet.com> on February 1, 2012, entitled "Analyst: All consoles to get price cuts in 2011"
17 stating that there are three major console manufacturers. The article reads: "The time has come
18 for all three major console makers--Microsoft, Nintendo, and Sony--to drop the prices of their
19 hardware, one analyst says."

20 5. Attached hereto as Exhibit D is a true and correct copy of an article published at
21 <pcworld.com> on September 25, 2009, entitled "Game Console Makers Gear up for the
22 Holidays." The article indicates that there are three game console makers: Sony, Microsoft, and
23 Nintendo.

24 6. Attached hereto as Exhibit E is a true and correct copy of an article published at
25 <digitaltrends.com> on February 2, 2011, entitled "Price cuts coming to all three game consoles
26 in 2011, says analyst."

27 7. Attached hereto as Exhibit F is a true and correct copy of U.S. Patent and Trademark
28 Office trademark registration number 3,241, 346 for the mark PLAYSTATION for "Computer

1 Game Equipment Containing Memory Devices” and “Video Game Cartridges.” The Owner is
2 listed as “Sony Computer Entertainment Inc. CORPORATION JAPAN 2-6-21, Minami-Aoyama
3 Minato-ku Tokyo JAPAN.”

4 8. Attached hereto as Exhibit G is a true and correct copy of U.S. Patent and Trademark
5 Office trademark registration number 2,343,853 for the mark PLAYSTATION for “providing
6 computer software featuring games that may be downloaded from a global computer network;
7 providing educational software in the field of video games that may be downloaded from a
8 global computer network; providing computer games from a global computer network; providing
9 an on-line computer game; providing information regarding game strategies or play strategies for
10 video game software by a global communication network; leasing game machines for on-line
11 network games; and rental of game machines of on-line network games.” The Owner is listed as
12 “Sony Computer Entertainment Inc. CORPORATION JAPAN 2-6-21, MINAMI-AOYAMA
13 MINATO-KU Tokyo JAPAN 1070062.”

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

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20 DATE: February 2, 2011

Respectfully Submitted,

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22 /s/ Stewart Kellar

23 STEWART KELLAR
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