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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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17 SONY COMPUTER ENTERTAINMENT AMERICA LLC

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

21 SONY COMPUTER ENTERTAINMENT
22 AMERICA LLC,

23 Plaintiff,

24 v.

25 GEORGE HOTZ; HECTOR MARTIN
26 CANTERO; SVEN PETER; and DOES
27 1 through 100,

28 Defendants.

Case No. **CV11 0167**

**DECLARATION OF HOLLY
GAUDREAU IN SUPPORT OF
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS D, G, U, 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** JCS

Date:
Time:
Courtroom:
Judge:

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

ORIGINAL

1 could and would testify competently thereto.

2 2. SCEA seeks to file under seal Exhibits D, G, U, V, W, Y and CC to Declaration
3 of Ryan Bricker In Support of *Ex Parte* Motion for Temporary Restraining Order And Order To
4 Show Cause Re Preliminary Injunction; Order of Impoundment.

5 3. The above referenced exhibits to the Bricker Declaration 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 6. A stipulation to file under seal could not be obtained because SCEA's request is
15 being made in conjunction with SCEA's *Ex Parte* Motion for A Temporary Restraining Order
16 And Order To Show Cause Re Preliminary Injunction; Order of Impoundment.

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

19 Executed on January 11, 2011, at San Francisco, California.

20
21 
22 Holly Gaudreau

23 63093978 v1