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 SONY COMPUTER ENTERTAINMENT AMERICA LLC

10  
 11 UNITED STATES DISTRICT COURT  
 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN FRANCISCO DIVISION

14 SONY COMPUTER ENTERTAINMENT  
 AMERICA LLC,

15 Plaintiff,

16 v.

17 GEORGE HOTZ; HECTOR MARTIN  
 18 CANTERO; SVEN PETER; and DOES  
 19 1 through 100,

20 Defendants.

Case No. CV-11-00167 SI

**[PROPOSED] ORDER GRANTING  
 MOTION FOR EXPEDITED  
 DISCOVERY**

Date: February 9, 2011  
 Time: 9:00 a.m.  
 Dept.: Courtroom 10, 19th Floor  
 Judge: Hon. Susan Illston

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 22  
 23 Having considered the Motion for Expedited Discovery of Plaintiff Sony Computer  
 24 Entertainment America LLC ("SCEA"), and all papers on file and the argument of counsel,  
 25 and good cause appearing thereof, the Court hereby grants SCEA's Motion.

26 IT IS HEREBY ORDERED that:

27 Expedited Jurisdictional Discovery

28 1. SCEA has leave to serve its First Requests for Production with a shortened



1 response time on Defendant George Hotz (“Hotz”), for a response within five days.

2 2. SCEA has leave to serve its First Set of Interrogatories with a shortened  
3 response time on Hotz, for a response within five days.

4 3. SCEA has leave to serve its First Demand for Inspection with a shortened  
5 response time on Hotz, for a response within five days.

6 4. SCEA has leave to serve its Notice of Deposition of George Hotz to take  
7 place no later than February 16, 2011.

8 5. SCEA has leave to serve a subpoena with a shortened response time on the  
9 content host, Bluehost, Inc., for information concerning Defendant George Hotz’s website  
10 at [www.geohot.com](http://www.geohot.com), for a response within five days after service.

11 6. SCEA has leave to serve a subpoena with a shortened response time on  
12 PayPal, Inc. for information concerning the account of Defendant George Hotz (“Hotz”), for  
13 a response within five days after service.

14 7. SCEA has leave to serve a subpoena with a shortened response time on  
15 Google, Inc. for information concerning Hotz’s blog at [www.geohotps3.blogspot.com](http://www.geohotps3.blogspot.com), for a  
16 response within five days after service.

17 8. SCEA has leave to serve a subpoena with a shortened response time on  
18 Twitter, Inc. for information concerning account holder “geohot”, for a response within five  
19 days after service.

20 9. SCEA has leave to serve a subpoena with a shortened response time on  
21 SoftLayer Technologies, Inc. for information concerning psx-scene.com account holder  
22 “geohot,” for a response within five days after service.

23 10. SCEA has leave to serve a subpoena with a shortened response time on  
24 YouTube, LLC for information concerning the video posted by Hotz on January 7, 2011  
25 entitled “Jailbroken PS3 3.55 with Homebrew,” for a response within five days after  
26 service.

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1                   Expedited Discovery On The Identity and Location of The Fail0verflow  
2                   Defendants and Third Parties

3                   11.     SCEA has leave to serve a subpoena with a shortened response time on  
4     PayPal, Inc. for information concerning the accounts of Defendant Hector Cantero  
5     ("Cantero"), Defendant Sven Peter ("Peter"), Defendant Doe 1 Bushing ("Bushing"),  
6     Defendant Doe 2 Segher ("Segher") and "kakaroto," for a response within five days after  
7     service.

8                   12.     SCEA has leave to serve a subpoena with a shortened response time on  
9     Twitter, Inc. for information concerning account holders Cantero ("marcan42"), Peter  
10    ("bl4sty"), Bushing ("gnihsb"), Segher ("pytey"), and "KaKaRoToKS," for a response within  
11    five days after service.

12                  13.     SCEA has leave to serve a subpoena with a shortened response time on  
13    Geeknet, Inc. for information concerning Slashdot.com account holders Cantero  
14    ("marcansoft") and Bushing ("bushing"), for a response within five days after service.

15                  14.     SCEA has leave to serve a subpoena with a shortened response time on  
16    Kickstarter for information concerning account holder Bushing, for a response within five  
17    days after service.

18                  15.     SCEA has leave to serve a subpoena with a shortened response time on  
19    Github.com for information concerning account holders "hermesEOL," "kakaroto,"  
20    "kmeaw," "waninkoko," and "grafchokolo," for a response within five days after service.

21                  16.     SCEA has leave to serve similarly targeted subpoenas with a shortened  
22    response time to any third party who SCEA learns may be involved in the circumvention  
23    and/or offering to the public, posting online, marketing, advertising, promoting, installing,  
24    distributing, providing and otherwise trafficking in any circumvention technology, product,  
25    service, method, code, software tool, device, component or part thereof that circumvents  
26    the technological protection measures ("TPMs") in the PlayStation®3 computer  
27    entertainment system ("PS3 System"), including but not limited to the Elliptic Curve Digital  
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1 Signature Algorithm Keys, encryption and/or decryption keys, 3.55 Firmware Jailbreak,  
2 dePKG Firmware Decrypter, Signing Tools, root keys and/or Fail0verflow tools, and/or any  
3 other technologies that enable unauthorized access to and/or copying of PS3 Systems and  
4 other copyrighted works that are accessible through or compatible with the PS3 System,  
5 for a response within five days after service.

6 17. SCEA has leave to serve similarly targeted subpoenas with a shortened  
7 response time to any third party who SCEA learns may have knowledge of the  
8 circumvention and/or offering to the public, posting online, marketing, advertising,  
9 promoting, installing, distributing, providing and otherwise trafficking in any circumvention  
10 technology, product, service, method, code, software tool, device, component or part  
11 thereof that circumvents the TPMs in the PS3 System, including but not limited to the  
12 Elliptic Curve Digital Signature Algorithm Keys, encryption and/or decryption keys, 3.55  
13 Firmware Jailbreak, dePKG Firmware Decrypter, Signing Tools, root keys and/or  
14 Fail0verflow tools, and/or any other technologies that enable unauthorized access to  
15 and/or copying of PS3 Systems and other copyrighted works that are accessible through  
16 and compatible with the PS3 System, for a response within five days after service.

17 IT IS SO ORDERED.

18  
19 DATED: \_\_\_\_\_

20 \_\_\_\_\_  
21 HON. SUSAN ILLSTON  
22 UNITED STATES DISTRICT JUDGE

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