

EXHIBIT C
TO THE DECLARATION OF HOLLY GAUDREAU IN
SUPPORT OF MOTION FOR EXPEDITED
DISCOVERY

1 KILPATRICK TOWNSEND & STOCKTON LLP
JAMES G. GILLILAND, JR. (State Bar No. 107988)
2 TIMOTHY R. CAHN (State Bar No. 162136)
MEHRNAZ BOROUMAND SMITH (State Bar No. 197271)
3 HOLLY GAUDREAU (State Bar No. 209114)
RYAN BRICKER (State Bar No. 269100)
4 Two Embarcadero Center Eighth Floor
San Francisco, CA 94111
5 Telephone: (415) 576-0200
Facsimile: (415) 576-0300
6 Email: jgilliland@kilpatricktownsend.com
tcahn@kilpatricktownsend.com
7 mboroumand@kilpatricktownsend.com
hgaudreau@kilpatricktownsend.com
8 rbricker@kilpatricktownsend.com

9 Attorneys for Plaintiff
SONY COMPUTER ENTERTAINMENT AMERICA LLC

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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. 11-cv-00167 SI

**PLAINTIFF'S FIRST DEMAND FOR
INSPECTION TO DEFENDANT GEORGE
HOTZ**

JURISDICTIONAL DISCOVERY

EXPEDITED RESPONSE REQUESTED

Judge: Hon. Susan Illston

1 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, plaintiff Sony
2 Computer Entertainment America LLC ("SCEA") requests that Defendant George Hotz make
3 available for inspection the items described herein. The items requested shall be made
4 available for inspection by February 15, 2011, at 10:00 a.m. at the offices of Kilpatrick
5 Townsend & Stockton, Two Embarcadero Center, 8th Floor, San Francisco, CA 94111 or at
6 such other location as may be agreed upon by the parties.

7 **DEFINITIONS AND INSTRUCTIONS**

8 1. The term "YOU" or "YOUR" means George Hotz and any agents, attorneys,
9 employees, representatives or anyone else acting or purporting to act on YOUR behalf or
10 under YOUR control.

11 2. The term "PS3 SYSTEM" means the PlayStation®3 computer entertainment
12 system.

13 3. The term "DOCUMENT" is used in its customarily broad sense within the
14 context of the Federal Rules of Civil Procedure and includes all documents as defined in Fed.
15 R. Civ. P. 34 and, without limitation, each original, or a copy or microfilm in the absence of
16 the original, and every copy bearing notes or markings not present on the original or copy,
17 letters, memoranda, drafts, notes, notebooks, translations, data compilations, reports, e-
18 mails, computer disks, publications, computer printouts, charts, photographs, and other data
19 compilations from which information can be obtained or translated, if necessary, by SCEA
20 through detection devices into a reasonably usable form. The term "DOCUMENT" also
21 refers to any tangible object such as, but not limited to, prototypes, models and specimens.

22 4. The term "CIRCUMVENTION DEVICES" refers to any circumvention
23 technology, product, service, method, code, software tool, device, component or part thereof
24 that circumvents the technological protection measures ("TPMs") in the PS3 SYSTEM,
25 including but not limited to the Elliptic Curve Digital Signature Algorithm Keys, encryption
26 and/or decryption keys, 3.55 Firmware Jailbreak, dePKG Firmware Decrypter, Signing Tools,
27 root keys, and/or Fail0verflow tools and/or any other technologies that enable unauthorized
28 access to and/or copying of the PS3 SYSTEM and other copyrighted works that are

1 accessible through or compatible with the PS3 SYSTEM.

2 5. The term "STORAGE SYSTEMS" refers to any data storage medium, physical,
3 virtual, or otherwise, including but not limited to local storage mediums, portable media,
4 and/or virtual, networked, Internet-based, shared, and/or server-based storage mediums.

5 6. If any items that fall within the scope of the inspection demand were lost or
6 destroyed, please state so and explain all circumstances related to the loss or destruction of
7 the items.

8 7. For the inspection, YOU will decrypt any encrypted information on the
9 computers and provide access to all decrypted information in connection with the PS3
10 SYSTEM and CIRCUMVENTION DEVICES as set forth below.

11 **INSPECTION DEMAND**

12 **INSPECTION DEMAND NO. 1:**

13 All PS3 SYSTEM consoles in YOUR possession, custody or control.

14 **INSPECTION DEMAND NO. 2:**

15 All computers which YOU have used to create any DOCUMENT, email or program
16 related to the PS3 SYSTEM.

17 **INSPECTION DEMAND NO. 3:**

18 All computers which YOU have used to write or create code or programs that run on
19 the PS3 SYSTEM or enable other software to run on the PS3 SYSTEM.

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1 **INSPECTION DEMAND NO. 4:**

2 All computers, hard drives, CD-roms, DVDs, USB sticks or any other storage devices
3 or STORAGE SYSTEMS which contain or have contained and/or have transmitted any
4 CIRCUMVENTION DEVICES and/or copies thereof.

5 DATED: February 4, 2011

Respectfully submitted,
KILPATRICK TOWNSEND & STOCKTON LLP

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8 By: _____
9 JAMES G. GILLILAND, JR.

10 Attorneys for Plaintiff
11 SONY COMPUTER ENTERTAINMENT AMERICA LLC

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