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9 Attorneys for Plaintiff
 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 1
 through 100,

19 Defendants.
 20
 21

Case No. 11-cv-00167 SI

**ADMINISTRATIVE MOTION TO FILE
 UNDER SEAL EXHIBIT B TO
 DECLARATION OF HOLLY
 GAUDREAU IN SUPPORT OF
 PLAINTIFF'S OPPOSITION TO
 DEFENDANT'S MOTION RE: TRO**

Date: February 10, 2011
 Time: 10:00am
 Courtroom: 10, 19th Floor
 Judge: Hon. Susan Illston

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 Exhibit B to
3 Declaration of Holly Gaudreau In Support of Plaintiff’s Opposition to Defendant’s Motion Re:
4 TRO. Pursuant to Local Rule 79-5 (c) (3), SCEA is lodging with the Clerk a copy of these
5 documents for filing under seal. This motion is supported by the Declaration of Holly
6 Gaudreau (“Gaudreau Decl.”) filed concurrently herein.

7 Exhibit B to the Gaudreau Declaration contains a circumvention device, a part
8 thereof, and/or proprietary information related to devices that circumvent the technological
9 protection measures (“TPMs”) in SCEA’s PlayStation®3 computer entertainment system
10 (“PS3 System”). Gaudreau Decl., ¶2.

11 SCEA has brought this action to put an end to the illegal circumvention of these
12 TPMs in its PS3 System. SCEA, therefore, does not want the means of such circumvention
13 – the very practice it is aiming to stop – to be a matter of public record, thereby making the
14 information further available and enabling others to engage in this illegal practice. *Id.* at ¶3.
15 SCEA’s request is narrowly tailored to seal only those materials for which good cause to
16 seal has been established. *Id.* at ¶4.

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

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20 DATED: February 9, 2011

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON LLP

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23 By: /s/ Holly Gaudreau

Holly Gaudreau

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25 Attorneys for Plaintiff
26 SONY COMPUTER ENTERTAINMENT AMERICA LLC
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