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9	Attorneys for Plaintiff SONY COMPUTER ENTERTAINMENT AMERICA LLC		
10	30NT COMPUTER ENTERTAINMENT AMERICA LLC		
11	UNITED STATES DISTRICT COURT		
12	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
13	SAN FRANCISCO DIVISION		
14	SONY COMPUTER ENTERTAINMENT AMERICA LLC,	Case No. 11-cv-0	00167 SI
15	Plaintiff,	DECLARATION GAUDREAU IN	
16	V.		/E MOTION TO FILE
17	GEORGE HOTZ; HECTOR MARTIN	DECLARATION GAUDREAU IN	OF HOLLY
18	CANTERO; SVEN PETER; and DOES 1 through 100,	PLAINTIFF'S OF	
19	Defendants.	Date:	February 10, 2011
20		Time: Courtroom:	10:00am 10, 19th Floor
21		Judge:	Hon. Susan Illston
22		ı	
23			
24	I, Holly Gaudreau, declare as follows:		
25	 I am an attorney in the law firm of Kilpatrick Townsend & Stockton LLP, counse 		
26	of record for plaintiff Sony Computer Entertainment America LLC ("SCEA") in the above-		
27	captioned matter. I make this declaration on personal knowledge and if called as a witness		
28	could and would testify competently thereto	O .	

- 2. Exhibit B to the Gaudreau Declaration contains a circumvention device, a part thereof, and/or proprietary information related to devices that circumvent the technological protection measures ("TPMs") in SCEA's PlayStation®3 computer entertainment system ("PS3 System").
- 3. SCEA has brought this action to put an end to the illegal circumvention of these TPMs in its PS3 System. SCEA, therefore, does not want the means of such circumvention the very practice it is aiming to stop to be a matter of public record, thereby making the information further available and enabling others to engage in this illegal practice.
- 4. SCEA's request is narrowly tailored to seal only those materials for which good cause to seal has been established.

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

Executed on February 9, 2011, at San Francisco, California.

/s/ Holly Gaudreau	
Holly Gaudreau	

63146402 v1

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