EXHIBIT 3





Protocols discussed on March 16, 2011 conference call:

- TIG has received approval to forensically image the drives we have in evidence (in their encrypted state).
- Mr. Holtz will make an appointment for the week of March 21 25, 2011 to respond to TIG with
 the computer that the hard drives were installed in for the purpose of creating an un-encrypted
 image. If Mr. Holtz does not provide the encryption password then he will need to remain at
 TIG or close by until the process is finished which is estimated at least six hours since the system
 contains two mirrored 1TB drives.
- Sony Corporation's counsel will provide copies of the following items which will be copied into evidence files.
 - A copy of the SDK: (These files shall not be produced to Mr. Holtz's Attorney by TIG unless and until advised by the court and/or Sony Corporation)
 - A copy or copies of the "Circumvention Devices" (These files shall not be produced to Mr. Holtz's Attorney by TIG unless and until advised by the court and/or Sony Corporation)
 - A list of web sites and cookies and other information agreed upon by the parties which might appear on a user's computer if they accessed the "Secure" area of PlayStation Network which requires a valid user name and password.
- Both sides will review and agree to search terms that TIG shall use to conduct searches in an
 effort to prove/disprove access to the "Secure" PlayStation Network. These terms will be
 provided no later than <DATE>.
- TIG shall review the web sites and cookies provided by Sony and verify that the sites are located on the "Secure" area of the PlayStation Network.
- Once the forensic images of the un-encrypted drives has been pre-processed TIG shall conduct the following procedures:
 - TIG will search the hard drive for the cookies and web sites provided by Sony in an attempt to prove/disprove that the computer system had accessed the "Secure" area of the PlayStation Network.
 - TIG will conduct keyword searches as agreed to by both parties in an effort to prove/disprove that the computer system had accessed the "Secure" area of the PlayStation Network.
 - TIG will search the hard drive and determine if all or parts of the SDK provided to us by Sony exists on the hard drives.
- Once the searches and processes have been completed, TIG will provide them to Mr. Holtz's
 Attorney for a privileged/not relevant review. Mr. Holtz's Attorney shall have seven days to
 review the data and complete the privileged/not relevant logs. Items marked as not relevant



1545 US Hwy 206, STE 206 Tel – 908-901-0112 Fax – 908-901-0115

indicates that Mr. Holtz's Attorney is objecting to the production as the items so marked have nothing to do with access to the "Secure" area of the PlayStation Network.

• Once the Privileged/Not Relevant logs are received by TIG, items not included can be produced to Sony Corporation.