

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

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.

Case No. 11-cv-00167 SI

**DECLARATION OF HOLLY
 GAUDREAU IN SUPPORT OF
 ADMINISTRATIVE MOTION TO FILE
 UNDER SEAL EXHIBITS T AND X
 TO DECLARATION OF RYAN
 BRICKER IN SUPPORT OF EX
 PARTE MOTION FOR TEMPORARY
 RESTRAINING ORDER AND ORDER
 TO SHOW CAUSE RE
 PRELIMINARY INJUNCTION;
 ORDER OF IMPOUNDMENT**

Date:
 Time:
 Courtroom: 10, 19th Floor
 Judge: Hon. Susan Illston

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 25 I, Holly Gaudreau, declare as follows:

26 1. I am an attorney in the law firm of Kilpatrick Townsend & Stockton LLP, counsel
 27 of record for plaintiff Sony Computer Entertainment America LLC (“SCEA”) in the above-
 28 captioned matter. I make this declaration on personal knowledge and if called as a witness

1 could and would testify competently thereto.

2 2. On January 11, 2011, SCEA filed an Administrative Motion to File Under Seal
3 Exhibits D, G, U, V, W, Y, and CC to the Bricker Declaration. However, Exhibits T and X to
4 the Bricker Declaration were inadvertently omitted from that filing.

5 3. Like Exhibits D, G, U, V, W, Y and CC, Exhibits T and X contain explicit
6 instructions on how to circumvent the technological protection measures (“TPMs”) in SCEA’s
7 PlayStation®3 computer entertainment system (“PS3 System”).

8 4. SCEA has brought this action to put an end to Defendants’ illegal circumvention
9 of these TPMs in its PS3 System. SCEA, therefore, does not want the means of such
10 circumvention – the very practice it is aiming to stop – to be a matter of public record, thereby
11 making the information further available and enabling others to engage in this illegal practice.

12 5. SCEA’s request is narrowly tailored to seal only those materials for which good
13 cause to seal has been established.

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

16 Executed on January 13, 2011, at San Francisco, California.

17
18 /s/Holly Gaudreau
19 Holly Gaudreau

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