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 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

**PLAINTIFF'S ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL
 EXHIBITS I, J, K, L, M, N and O 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

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 Exhibits I, J,
3 K, L, M, N and O to Declaration of Ryan Bricker In Support of *Ex Parte* Motion for
4 Temporary Restraining Order And Order To Show Cause Re Preliminary Injunction; Order
5 of Impoundment (“Bricker Declaration”). Pursuant to Local Rule 79-5 (c) (3), SCEA is
6 lodging with the Clerk a copy of this document for filing under seal. This motion is
7 supported by the Declaration of Holly Gaudreau in Support of Administrative Motion to File
8 Under Seal (“Gaudreau Decl.”) filed concurrently herein.

9 On January 11, 2011, SCEA filed an Administrative Motion to File Under Seal
10 Exhibits D, G, U, V, W, Y, and CC to the Bricker Declaration. Exhibits T and X to the
11 Bricker Declaration were inadvertently omitted from that filing, and the Court granted
12 SCEA’s administrative motion to seal those documents on January 18, 2011. Similar to the
13 other documents that SCEA has lodged under seal, Exhibits I, J, K, L, M, N, and O contain
14 explicit instructions on how to circumvent technology protection measures (“TPMs”) in
15 gaming console and portable media device systems. Gaudreau Decl., ¶2.

16 SCEA has brought this action to put an end to Defendants’ illegal circumvention of
17 the TPMs in its PlayStation®3 computer entertainment system. SCEA, therefore, does not
18 want the means of any circumvention – the type of practice it is aiming to stop – to be a
19 matter of public record, thereby making the information further available and enabling
20 others to engage in these illegal practices. *Id.* at ¶3. SCEA’s request is narrowly tailored to
21 seal only those materials for which good cause to seal has been established. *Id.* at ¶4.

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1 Accordingly, SCEA respectfully requests that the Court grant its Administrative
2 Motion to file Exhibits I, J, K, L, M, N and O to the Bricker Declaration under seal.

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4 DATED: January 20, 2011

Respectfully submitted,

5 KILPATRICK TOWNSEND & STOCKTON LLP

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7 By: /s/Holly Gaudreau

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