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9 Attorneys for Plaintiff
 10 SONY COMPUTER ENTERTAINMENT AMERICA LLC

11 UNITED STATES DISTRICT COURT
 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 13 SAN FRANCISCO DIVISION

14 SONY COMPUTER ENTERTAINMENT
 15 AMERICA LLC,
 16 Plaintiff,
 17 v.
 18 GEORGE HOTZ; HECTOR MARTIN
 19 CANTERO; SVEN PETER; and DOES
 20 1 through 100,
 21 Defendants.

Case No. CV-11-00167 SI

**[PROPOSED] ORDER GRANTING
 MOTION FOR EXPEDITED
 DISCOVERY**

Date: February 9, 2011
 Time: 9:00 a.m.
 Dept.: Courtroom 10, 19th Floor
 Judge: Hon. Susan Illston

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 23 Having considered the Motion for Expedited Discovery of Plaintiff Sony Computer
 24 Entertainment America LLC (“SCEA”), and all papers on file and the argument of counsel,
 25 and good cause appearing thereof, the Court hereby grants SCEA’s Motion.

26 IT IS HEREBY ORDERED that:

27 Expedited Jurisdictional Discovery

- 28 1. SCEA has leave to serve its First Requests for Production with a shortened



1 response time on Defendant George Hotz (“Hotz”), for a response within five days.

2 2. SCEA has leave to serve its First Set of Interrogatories with a shortened
3 response time on Hotz, for a response within five days.

4 3. SCEA has leave to serve its First Demand for Inspection with a shortened
5 response time on Hotz, for a response within five days.

6 4. SCEA has leave to serve its Notice of Deposition of George Hotz to take
7 place no later than February 16, 2011.

8 5. SCEA has leave to serve a subpoena with a shortened response time on the
9 content host, Bluehost, Inc., for information concerning Defendant George Hotz’s website
10 at www.geohot.com, for a response within five days after service.

11 6. SCEA has leave to serve a subpoena with a shortened response time on
12 PayPal, Inc. for information concerning the account of Defendant George Hotz (“Hotz”), for
13 a response within five days after service.

14 7. SCEA has leave to serve a subpoena with a shortened response time on
15 Google, Inc. for information concerning Hotz’s blog at www.geohotps3.blogspot.com, for a
16 response within five days after service.

17 8. SCEA has leave to serve a subpoena with a shortened response time on
18 Twitter, Inc. for information concerning account holder “geohot”, for a response within five
19 days after service.

20 9. SCEA has leave to serve a subpoena with a shortened response time on
21 SoftLayer Technologies, Inc. for information concerning psx-scene.com account holder
22 “geohot,” for a response within five days after service.

23 10. SCEA has leave to serve a subpoena with a shortened response time on
24 YouTube, LLC for information concerning the video posted by Hotz on January 7, 2011
25 entitled “Jailbroken PS3 3.55 with Homebrew,” for a response within five days after
26 service.

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Expedited Discovery On The Identity and Location of The Fail0verflow Defendants and Third Parties

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4 11. SCEA has leave to serve a subpoena with a shortened response time on
5 PayPal, Inc. for information concerning the accounts of Defendant Hector Cantero
6 (“Cantero”), Defendant Sven Peter (“Peter”), Defendant Doe 1 Bushing (“Bushing”),
7 Defendant Doe 2 Segher (“Segher”) and “kakaroto,” for a response within five days after
8 service.

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10 12. SCEA has leave to serve a subpoena with a shortened response time on
11 Twitter, Inc. for information concerning account holders Cantero (“marcan42”), Peter
12 (“bl4sty”), Bushing (“gnihsb”), Segher (“pytey”), and “KaKaRoToKS,” for a response within
13 five days after service.

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15 13. SCEA has leave to serve a subpoena with a shortened response time on
16 Geeknet, Inc. for information concerning Slashdot.com account holders Cantero
17 (“marcansoft”) and Bushing (“bushing”), for a response within five days after service.

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19 14. SCEA has leave to serve a subpoena with a shortened response time on
20 Kickstarter for information concerning account holder Bushing, for a response within five
21 days after service.

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23 15. SCEA has leave to serve a subpoena with a shortened response time on
24 Github.com for information concerning account holders “hermesEOL,” “kakaroto,”
25 “kmeaw,” “waninkoko,” and “grafchokolo,” for a response within five days after service.

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27 16. SCEA has leave to serve similarly targeted subpoenas with a shortened
28 response time to any third party who SCEA learns may be involved in the circumvention
and/or offering to the public, posting online, marketing, advertising, promoting, installing,
distributing, providing and otherwise trafficking in any circumvention technology, product,
service, method, code, software tool, device, component or part thereof that circumvents
the technological protection measures (“TPMs”) in the PlayStation®3 computer
entertainment system (“PS3 System”), including but not limited to the Elliptic Curve Digital



1 Signature Algorithm Keys, encryption and/or decryption keys, 3.55 Firmware Jailbreak,
2 dePKG Firmware Decrypter, Signing Tools, root keys and/or Fail0verflow tools, and/or any
3 other technologies that enable unauthorized access to and/or copying of PS3 Systems and
4 other copyrighted works that are accessible through or compatible with the PS3 System,
5 for a response within five days after service.

6 17. SCEA has leave to serve similarly targeted subpoenas with a shortened
7 response time to any third party who SCEA learns may have knowledge of the
8 circumvention and/or offering to the public, posting online, marketing, advertising,
9 promoting, installing, distributing, providing and otherwise trafficking in any circumvention
10 technology, product, service, method, code, software tool, device, component or part
11 thereof that circumvents the TPMs in the PS3 System, including but not limited to the
12 Elliptic Curve Digital Signature Algorithm Keys, encryption and/or decryption keys, 3.55
13 Firmware Jailbreak, dePKG Firmware Decrypter, Signing Tools, root keys and/or
14 Fail0verflow tools, and/or any other technologies that enable unauthorized access to
15 and/or copying of PS3 Systems and other copyrighted works that are accessible through
16 and compatible with the PS3 System, for a response within five days after service.

17 IT IS SO ORDERED.

18
19 DATED: _____

20 HON. SUSAN ILLSTON
21 UNITED STATES DISTRICT JUDGE

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