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Attorney for Defendant
GEORGE HOTZ

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

SONY COMPUTER ENTERTAINMENT AMERICA LLC, a Delaware limited liability company, Plaintiff, v. GEORGE HOTZ; HECTOR MARTIN CANTERO; SVEN PETER; and DOES 1 through 100, Defendants.	**CASE No.: 3:11-cv-00167** **SECOND DECLARATION OF STEWART KELLAR IN SUPPORT OF MOTION TO DIMISS FOR LACK OF PERSONAL JURISDICTION AND IMPROPER VENUE**

I, Stewart Kellar, declare:

1. I am counsel of record for Mr. George Hotz in the above-captioned matter. I have personal knowledge of the facts stated in this declaration, unless otherwise indicated, and could and would testify competently thereto.

2. Attached hereto as Exhibit A is a true and correct copy of corporate information published at <http://www.scei.co.jp> and accessed on 2/2/2011 entitled "Company Profile." The document states the company is located at 1-7-1 Konan, Minato-ku, Tokyo, 108-0075 Japan.

3. Attached hereto as Exhibit B is a true and correct copy of WhoIs information for <playstation.net> accessed on 2/2/2011 at <http://www.networksolutions.com/whois-search/playstation.net>. The WhoIs information shows that the registrant, for <playstation.net> is Sony Computer Entertainment Inc., Akasaka 7-1-1Aoyamayasuda Bldg., Minato-ku, Tokyo 107-0052, Japan. The WhoIs information shows that the administrative and technical contact for <playstation.net> is domain-admin@scei.co.jp, Sony Computer Entertainment Inc., 2-6-21, Minami-Aoyama, Minato-ku, Tokyo 107-0062, Japan.

4. Attached hereto as Exhibit C is a true and correct copy of an article published at <cnet.com> on February 1, 2012, entitled "Analyst: All consoles to get price cuts in 2011" stating that there are three major console manufacturers. The article reads: "The time has come for all three major console makers--Microsoft, Nintendo, and Sony--to drop the prices of their hardware, one analyst says."

5. Attached hereto as Exhibit D is a true and correct copy of an article published at <pcworld.com> on September 25, 2009, entitled "Game Console Makers Gear up for the Holidays." The article indicates that there are three game console makers: Sony, Microsoft, and Nintendo.

6. Attached hereto as Exhibit E is a true and correct copy of an article published at <digitaltrends.com> on February 2, 2011, entitled "Price cuts coming to all three game consoles in 2011, says analyst."

7. Attached hereto as Exhibit F is a true and correct copy of U.S. Patent and Trademark Office trademark registration number 3,241, 346 for the mark PLAYSTATION for "Computer

Game Equipment Containing Memory Devices" and "Video Game Cartridges." The Owner is listed as "Sony Computer Entertainment Inc. CORPORATION JAPAN 2-6-21, Minami-Aoyama Minato-ku Tokyo JAPAN."

8. Attached hereto as Exhibit G is a true and correct copy of U.S. Patent and Trademark Office trademark registration number 2,343,853 for the mark PLAYSTATION for "providing computer software featuring games that may be downloaded from a global computer network; providing educational software in the field of video games that may be downloaded from a global computer network; providing computer games from a global computer network; providing an on-line computer game; providing information regarding game strategies or play strategies for video game software by a global communication network; leasing game machines for on-line network games; and rental of game machines of on-line network games." The Owner is listed as "Sony Computer Entertainment Inc. CORPORATION JAPAN 2-6-21, MINAMI-AOYAMA MINATO-KU Tokyo JAPAN 1070062."

I declare under penalty of perjury on this date under the laws of the United States in San Francisco, California that the foregoing is true and correct.

DATE: February 2, 2011

Respectfully Submitted,

/s/ Stewart Kellar

STEWART KELLAR