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15 **UNITED STATES DISTRICT COURT**  
 16 **NORTHERN DISTRICT OF CALIFORNIA**

17 SONY INTERACTIVE ENTERTAINMENT  
 18 LLC, a California limited liability company,

19 Plaintiff,

20 v.

21 TENCENT HOLDINGS LTD., a Cayman  
 Islands corporation; TENCENT  
 22 TECHNOLOGY (SHANGHAI) COMPANY  
 LTD. d/b/a AURORA STUDIOS and/or  
 23 POLARIS QUEST, a Chinese company;  
 TENCENT AMERICA LLC, a Delaware  
 24 limited liability company; PROXIMA BETA  
 PTE LTD. d/b/a TENCENT GAMES and/or  
 25 LEVEL INFINITE, a Singapore corporation;  
 PROXIMA BETA U.S. LLC, a Delaware  
 limited liability company; and DOES 1-10.

26 Defendants.  
 27

Case No. 3:25-cv-06275-JSC

**DECLARATION OF MATTHEW  
 KUYKENDALL IN SUPPORT OF  
 PLAINTIFF SONY INTERACTIVE  
 ENTERTAINMENT LLC'S MOTION  
 FOR PRELIMINARY INJUNCTION**

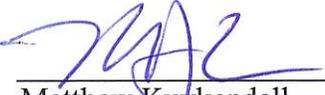
Date: November 20, 2025  
 Time: 10:00 a.m.  
 Courtroom: 8 – 19<sup>th</sup> Floor  
 Judge: Jacqueline Scott Corley

I, Matthew Kuykendall, under penalty of perjury, declare and state as follows:

1. I make this declaration based upon my personal knowledge of the facts and circumstances recited herein.
2. I am the Director of Brand Intellectual Property at Sony Interactive Entertainment LLC (“SIE”). As such, among my responsibilities are trademark and copyright portfolio management for SIE. In this role, I support the licensing of trademark and copyright rights between and among SIE and its affiliates.
3. I am aware that SIE has asserted the following copyrights in the above-captioned litigation, registered with the Copyright Office: Horizon Zero Dawn on PS4 (U.S. Reg. No. PA0002516411, filed 01/29/2025 and registered 02/10/2025) and for Horizon Forbidden West on PS4 (U.S. Reg. No. PA0002392809, filed 10/26/2022 and registered 10/31/2022) and PS5 (U.S. Reg. No. PA0002391316, filed 10/26/2022 and registered 10/31/2022).
4. SIE is the exclusive licensee of the rights in each of the afore-mentioned copyrights the United States.
5. I am also aware that SIE has asserted common law trademark rights in the ALOY character mark in the above-captioned litigation.
6. SIE is the owner of all rights, title, interest, and goodwill in the ALOY character mark derived from the ALOY character in Horizon franchise, used in connection with the Horizon franchise games and various of SIE’s products and services in the United States.

I declare under penalty of perjury the laws of the United States of America that the foregoing is true and correct.

Executed on this 8<sup>th</sup> day of October 2025, at San Mateo, California.

  
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Matthew Kuykendall