

1 ANNETTE L. HURST (BAR NO. 148738)
 ahurst@orrick.com
 2 DIANA M. RUTOWSKI (BAR NO. 233878)
 drutowski@orrick.com
 3 DANIEL D. JUSTICE (BAR NO. 291907)
 djustice@orrick.com
 4 ANA M. MENDEZ-VILLAMIL (BAR NO. 344768)
 amendez-villamil@orrick.com
 5 ORRICK, HERRINGTON & SUTCLIFFE LLP
 The Orrick Building
 6 405 Howard Street
 San Francisco, CA 94105-2669
 7 Telephone: +1 415 773 5700
 Facsimile: +1 415 773 5759

8
 9 LAURA A. WYTSMA (BAR NO. 189527)
 lawytsma@orrick.com
 10 ISAAC BEHNAWA (BAR NO. 342441)
 ibehnawa@orrick.com
 355 S. Grand Street, # 2700
 11 Los Angeles, CA 90071
 Telephone: +1 213 629 2020
 12 Facsimile: +1 213 612 2499

13 Attorneys for Plaintiff
 14 SONY INTERACTIVE ENTERTAINMENT LLC

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
 limited liability company; PROXIMA BETA
 24 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
 27 Defendants.

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

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

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

1 I, Diana Rutowski, declare as follows:

2 1. I am a partner of Orrick, Herrington & Sutcliffe LLP (“Orrick”), attorneys for
3 plaintiff Sony Interactive Entertainment LLC (“SIE”) in this matter.

4 2. I make this declaration based upon my personal knowledge of the facts and
5 circumstances recited herein.

6 3. I make this declaration in support of SIE’s Motion for Preliminary Injunction.

7 4. Attached as **Exhibit 1.A** is a true and correct webpage capture of Steam, Light of
8 Motiram, https://store.steampowered.com/app/3319630/LIGHT_OF_MOTIRAM/ (accessed June
9 12, 2025). Attached as **Exhibit 1.B** is a slipsheet indicating that a video appearing on this page is
10 being lodged with the Court in native format. Attached as **Exhibit 1.C** is a slipsheet indicating that
11 a second video appearing on this page is being lodged with the Court in native format.

12 5. Attached as **Exhibit 2.A.** is a true and correct webpage capture of @Gematsu,
13 YouTube, https://www.youtube.com/watch?v=PqwoP_cTo4I, “Light of Motiram - 16 Minutes of
14 Gameplay,” Nov. 28, 2024 (accessed June 12, 2025). Attached as **Exhibit 2.B.** is a slipsheet
15 indicating that the video appearing on this page is being lodged with the Court in native format.

16 6. Attached as **Exhibit 3** is a true and correct webpage capture of Jade King, The
17 Gamer, “Why Do You Even Need to Plagiarise Horizon Zero Dawn?,” November 29, 2024,
18 <https://www.thegamer.com/light-of-motiram-horizon-zero-dawn-plagiarism-copycat/> (accessed
19 June 12, 2025).

20 7. Attached as **Exhibit 4** is a true and correct webpage capture of the Adrian Werner,
21 GamePressure, “Light of Motiram, New Open-World Survival Game Inspired by Horizon and
22 Palworld, Was Just Announced,” November 28, 2024,
23 [https://www.gamepressure.com/newsroom/light-of-motiram-new-open-world-survival-game-](https://www.gamepressure.com/newsroom/light-of-motiram-new-open-world-survival-game-inspired-by-horizon/z675ee)
24 [inspired-by-horizon/z675ee](https://www.gamepressure.com/newsroom/light-of-motiram-new-open-world-survival-game-inspired-by-horizon/z675ee) (accessed October 1, 2025).

25 8. Attached as **Exhibit 5** is a true and correct webpage capture of Olly Smith,
26 GamingBible, “Horizon knock-off ripped apart by fans for ‘shameless’ copy,” November 28, 2024,
27
28

1 <https://www.gamingbible.com/news/light-of-motiram-horizon-comparisons-300123-20241128>
2 (accessed October 1, 2025).

3 9. Attached as **Exhibit 6** is a true and correct webpage capture of Zuhaad Ali,
4 TheGameStop, “‘Horizon Zero Originality’: Tencent’s *Light of Motiram* Slammed As A
5 ‘Shameless’ Clone Of Sony’s Horizon Series,” November 28, 2024,
6 <https://thegamepost.com/tencent-light-of-motiram-shameless-horizon-series/> (accessed June 12,
7 2025).

8 10. Attached as **Exhibit 7.A** is a true and correct webpage capture of Steam, Light of
9 Motiram, “Welcome to Light of Motiram on Steam,” Nov. 29, 2024,
10 [https://steamcommunity.com/app/3319630/eventcomments/4625855423768041356?snr=2_9_100](https://steamcommunity.com/app/3319630/eventcomments/4625855423768041356?snr=2_9_100003_)
11 [003_](https://steamcommunity.com/app/3319630/eventcomments/4625855423768041356?snr=2_9_100003_) (accessed June 12, 2025). Attached as **Exhibit 7.B** is a slipsheet indicating that a video
12 appearing on this page is being lodged with the Court in native format. Attached as **Exhibit 7.C** is
13 a slipsheet indicating that a second video appearing on this page is being lodged with the Court in
14 native format.

15 11. Attached as **Exhibit 8.A** is a true and correct webpage capture of @LightofMotiram,
16 YouTube, “Unveiling LIGHT OF MOTIRAM: Dev Insights & Gameplay Showcase,” Apr. 22,
17 2025, <https://www.youtube.com/watch?v=3mt0QDRCoEI> (accessed June 12, 2025). Attached as
18 **Exhibit 8.B** is a slipsheet indicating that the video appearing at this page is being lodged with the
19 Court in native format.

20 12. Attached as **Exhibit 9.A** is a true and correct webpage capture of @LightofMotiram,
21 YouTube, “From Destruction to Redemption - Rammasun | LIGHT OF MOTIRAM Cinematic &
22 Gameplay Trailer,” July 11, 2025, which was previously available at
23 <https://www.youtube.com/watch?v=6prk0Jxg7Cw> (accessed July 25, 2025). **Exhibit 9.B** is a true
24 and correct webpage capture of @LIGHTOFMOTIRAM, X, “RAMMASUN Cinematic &
25 Gameplay Trailer,” July 11, 2025,
26 <https://x.com/LIGHTOFMOTIRAM/status/1943596681360269538> (accessed July 23, 2025).

27
28

1 Attached as **Exhibit 9.C** is a slipsheet indicating that the video appearing at these pages is being
2 lodged with the Court in native format.

3 13. Attached as **Exhibit 10** is a true and correct webpage capture of the “Discover the
4 Horizon Universe” PlayStation official webpage, [https://www.playstation.com/en-](https://www.playstation.com/en-us/horizon/#discover)
5 [us/horizon/#discover](https://www.playstation.com/en-us/horizon/#discover) (accessed July 25, 2025).

6 14. Attached as **Exhibit 11** is a true and correct webpage capture of the Lucy O’Brien,
7 IGN, “Horizon Zero Dawn Review,” Feb. 20, 2017, [https://www.ign.com/](https://www.ign.com/articles/2017/02/20/horizon-zero-dawn-review)
8 [articles/2017/02/20/horizon-zero-dawn-review](https://www.ign.com/articles/2017/02/20/horizon-zero-dawn-review) (accessed June 17, 2025).

9 15. Attached as **Exhibit 12** is a true and correct webpage capture of Cian Maher, The
10 Gamer, “Horizon Zero Dawn’s Techno-Fantasy Setting Displays The Kind Of Ambition More
11 Games Should Strive For,” Jun. 5, 2021, <https://www.thegamer.com/horizon-zero-dawn-setting/>
12 (accessed July 15, 2025).

13 16. Attached as **Exhibit 13** is a true and correct webpage capture of the Alex V, New
14 Game Network, “Horizon Zero Dawn Review,” Feb. 20, 2017,
15 <https://www.newgamenetwork.com/article/1609/horizon-zero-dawn-review/> (accessed June 17,
16 2025).

17 17. Attached as **Exhibit 14** is a true and correct webpage capture of Andrew Webster,
18 The Verge, “Horizon Zero Dawn review: a greatest hits collection of open-world games,” Feb. 20,
19 2017, <https://www.theverge.com/2017/2/20/14665114/horizon-zero-dawn-review-ps4> (accessed
20 July 15, 2025).

21 18. Attached as **Exhibit 15** is a true and correct webpage capture of Smangaliso
22 Simelane, GameRant, “How Guerrilla Games’ Horizon Franchise Subverts the Sci-Fi Genre,” July
23 13, 2022, <https://gamerant.com/horizon-franchise-unique-guerrilla-games-subverts-sci-fi-genre/>
24 (accessed June 17, 2025).

25 19. Attached as **Exhibit 16** is a true and correct webpage capture of Andrea Phillips,
26 Strange Horizon, “Metagames: *Horizon Zero Dawn* Should Get a Hugo,” July 3, 2017,
27
28

1 [http://strangehorizons.com/wordpress/non-fiction/columns/metagames-horizon-zero-dawn-](http://strangehorizons.com/wordpress/non-fiction/columns/metagames-horizon-zero-dawn-should-get-a-hugo/)
2 [should-get-a-hugo/](http://strangehorizons.com/wordpress/non-fiction/columns/metagames-horizon-zero-dawn-should-get-a-hugo/) (accessed June 17, 2025).

3 20. Attached as **Exhibit 17** is a true and correct webpage capture of Isaac Williams,
4 CBR, “10 Video Game Apocalypses As Unique As The Last Of Us,” June 20, 2022,
5 <https://www.cbr.com/last-of-us-unique-video-game-apocalypses/> (accessed June 17, 2025).

6 21. Attached as **Exhibit 18** is a true and correct webpage capture of Sophie Ulanoff,
7 CBR, “Newly Announced Open-World Survival Game Looks Like a Major Horizon Rip-Off,” Dec.
8 2, 2024, <https://www.cbr.com/light-of-motiram-open-world-survival-horizon-rip-off/> (accessed
9 September 18, 2025).

10 22. Attached as **Exhibit 19** is a true and correct webpage capture of Viraj Bhatnagar,
11 GAMERANT, “New Tencent Game Accused of Copying Guerrilla’s Horizon Series,” Nov. 28,
12 2024, <https://gamerant.com/light-of-motiram-tencent-game-copy-horizon-guerrilla/> (accessed on
13 September 18, 2025).

14 23. Attached as **Exhibit 20** is a true and correct webpage capture of Anupam Lamba,
15 FANDOMWIRE, “Tencent Didn’t Learn Anything From These 5 Games’ Mistakes Before Making
16 Light of Motiram,” Nov. 29, 2024, <https://www.imdb.com/news/ni64980911/> (accessed September
17 18, 2025).

18 24. Attached as **Exhibit 21** is a true and correct webpage capture of “John Walker,
19 KOTAKU, “This Wild Copy of *Horizon Zero Dawn* Is Just Begging For Sony To Sue,” Nov. 28,
20 2024, <https://kotaku.com/horizon-zero-dawn-sony-light-of-motiram-tencent-copy-1851709969>
21 (accessed September 19, 2025).

22 25. Attached as **Exhibit 22** is a true and correct webpage capture of a Reddit discussion
23 titled “Tencent’s Light of Motiram is such a Horizon Zero Dawn rip-off, they’re hard to tell apart”
24 [https://www.reddit.com](https://www.reddit.com/r/videogames/comments/1h46aau/tencents_light_of_motiram_is_such_a_horizon_zero/)
25 [/r/videogames/comments/1h46aau/tencents_light_of_motiram_is_such_a_horizon_zero/](https://www.reddit.com/r/videogames/comments/1h46aau/tencents_light_of_motiram_is_such_a_horizon_zero/)
26 (accessed June 12, 2025).

27
28

1 26. Attached as **Exhibit 23** is a true and correct webpage capture of LIGHT OF
2 MOTIRAM Coming Soon - Epic Games Store, Epic Games, [https://store.epicgames.com/en-](https://store.epicgames.com/en-US/p/light-of-motiram-094dff)
3 [US/p/light-of-motiram-094dff](https://store.epicgames.com/en-US/p/light-of-motiram-094dff) (accessed June 12, 2025).

4 27. Attached as **Exhibit 24** is a true and correct webpage capture of r/Motiram, Reddit,
5 “DIRECTORY OF SURVIVAL - The MOTIRAM,” [https://www.reddit.com/r/Motiram/](https://www.reddit.com/r/Motiram/comments/1hy0r40/directory_of_survival_the_motiram/)
6 [comments/1hy0r40/directory_of_survival_the_motiram/](https://www.reddit.com/r/Motiram/comments/1hy0r40/directory_of_survival_the_motiram/) (accessed September 18, 2025).

7 28. Attached as **Exhibit 25** is a true and correct webpage capture of @LightofMotiram,
8 Twitter, Feb. 21, 2025, <https://x.com/LIGHTOFMOTIRAM/status/1892861838448005554>
9 (accessed June 12, 2025).

10 29. Attached as **Exhibit 26** is a true and correct webpage capture of Michael Caruso,
11 The Gamer, “10 Iconic Video Game Characters Introduced In The Last Decade,” Sep. 12, 2021,
12 <https://www.thegamer.com/iconic-video-game-characters-last-decade/> (accessed June 12, 2025)

13 30. Attached as **Exhibit 27** is a true and correct webpage capture of Polygon, “The 70
14 best video game characters of the decade,” Nov. 27, 2019,
15 [https://www.polygon.com/features/2019/11/27/20974490/greatest-video-game-characters-2019-](https://www.polygon.com/features/2019/11/27/20974490/greatest-video-game-characters-2019-2010-skyrim-witcher-splatoon)
16 [2010-skyrim-witcher-splatoon](https://www.polygon.com/features/2019/11/27/20974490/greatest-video-game-characters-2019-2010-skyrim-witcher-splatoon) (accessed June 12, 2025).

17 31. Attached as **Exhibit 28.A** is a true and correct webpage capture of
18 @LightofMotiram, YouTube, “LIGHT OF MOTIRAM | Official Announcement Trailer”, Nov. 29,
19 2024, which was previously available at <https://www.youtube.com/watch?v=7bABDo5r5fg>
20 (accessed June 12, 2025). Attached as **Exhibit 28.B** is a slipsheet indicating that the video
21 appearing on this page is being lodged with the Court in native format.

22 32. Attached as **Exhibit 29** is a true and correct webpage capture of Stan Hogeweg,
23 Gamerant, “Horizon Forbidden West Will Only Further Cement Aloy as a PlayStation Mascot,”
24 <https://gamerant.com/horizon-forbidden-west-aloy-playstation-mascot/> (accessed September 24,
25 2025).

26
27
28

1 33. Attached as **Exhibit 30** is a true and correct webpage capture of LIGHT OF
2 MOTIRAM (@lightof motiram) – Instagram photos and videos, available at
3 <https://www.instagram.com/lightofmotiram> (accessed September 24, 2025).

4 34. Attached as **Exhibit 31** is a true and correct webpage capture of the LIGHT OF
5 MOTIRAM Facebook page, available at <https://www.facebook.com/LIGHTOFMOTIRAM>
6 (accessed September 24, 2025).

7 35. Attached as **Exhibit 32** is a true and correct webpage capture of Steam Light of
8 Motiram, December 1, 2024, available at https://web.archive.org/web/20241201080716/https://store.steampowered.com/app/3319630/LIGHT_OF_MOTIRAM/ (accessed October 8, 2025).

9 36. Attached as **Exhibit 33** is a true and correct webpage capture of LIGHT OF
10 MOTIRAM on Steam available at [https://web.archive.org
11 /web/20241128103525/https://store.steampowered.com/app/3319630/LIGHT_OF_MOTIRAM/](https://web.archive.org/web/20241128103525/https://store.steampowered.com/app/3319630/LIGHT_OF_MOTIRAM/)
12 (accessed June 12, 2025).

13 37. Attached as **Exhibit 34** is a true and correct webpage capture of Tom Wilson,
14 Screenrant, “Upcoming Horizon Zero Dawn ‘Copycat’ Looks Better Than People Are Giving It
15 Credit For,” Nov. 30, 2024, <https://screenrant.com/light-motiram-horizon-zero-dawn-tencent/>
16 (accessed September 24, 2025).

17 38. Attached as **Exhibit 35** is a true and correct webpage capture of Michael
18 Harradence, PSU, “Light of Motiram Announced by Tencent, and It’s an Obvious Knockoff of
19 Sony’s Horizon Zero Dawn,” Nov. 28, 2024, [https://www.psu.com/news/light-of-motiram-
20 announced-by-tencent-and-its-an-obvious-knockoff-of-sonys-horizon-zero-dawn/](https://www.psu.com/news/light-of-motiram-announced-by-tencent-and-its-an-obvious-knockoff-of-sonys-horizon-zero-dawn/) (accessed
21 September 19, 2025).

22 39. Attached as **Exhibit 36** is a true and correct webpage capture of the contents of a
23 Google Drive folder that was previously available at
24 https://drive.google.com/drive/folders/1BYko-j3kaLCZPI8HR_h0mQcgE7mCAsGu (accessed
25 July 25, 2025). This link was previously accessible by clicking the “Press Kit” link at the bottom
26 of the Light of Motiram website. The “Press Kit” link is visible at the bottom of Exhibit 61, which
27
28

1 is a webpage capture of the Light of Motiram website as it existed on July 25, 2025, when the
2 Google Drive folder was accessed.

3 40. Attached as **Exhibit 37.A** is a true and correct webpage capture of the YouTube
4 page with comments “Internet laugh at how shamelessly Tencent game Light of Motiram rips off
5 Horizon” <https://www.youtube.com/watch?v=NC9AciQQEe0> (accessed June 12, 2025). Attached
6 as **Exhibit 37.B** is a slipsheet indicating that the video appearing on this page is being lodged with
7 the Court in native format.

8 41. Attached as **Exhibit 38** is a true and correct webpage capture of Vic Hud,
9 GamesIndustry.Biz, “Video game TV adaptations boost player numbers 140% on average, says
10 new report,” Sept. 16, 2025, [https://www.gamesindustry.biz/video-game-tv-adaptations-boost-](https://www.gamesindustry.biz/video-game-tv-adaptations-boost-player-numbers-140-on-average-says-new-report)
11 [player-numbers-140-on-average-says-new-report](https://www.gamesindustry.biz/video-game-tv-adaptations-boost-player-numbers-140-on-average-says-new-report) (accessed October 8, 2025).

12 42. Attached as **Exhibit 39** is a true and correct webpage capture of the LinkedIn profile
13 page for Gary Clubb, one of the Tencent employees identified in the Declaration of Olivier
14 Courtemanche as an attendee at the March 2024 meeting in San Francisco. Mr. Clubb’s profile lists
15 his title since 2023 as “Investments & Business Development, Tencent Games” and his location as
16 Los Angeles, California. His LinkedIn profile is available at
17 <https://www.linkedin.com/in/garyclubb/> (accessed October 8, 2025).

18 43. Attached as **Exhibit 40** is a true and correct webpage capture of a speaker bio for
19 Tian Xiao from the GamesBeat Summit 2025. The bio reflects that he is “the head of North America
20 strategic partnerships & investments at Tencent Games” and is available at
21 <https://gbs.gamesbeat.com/speaker/tian-xiao/> (accessed October 8, 2025). His LinkedIn profile
22 identifies his location as Irvine, California. His LinkedIn profile is available at
23 <https://www.linkedin.com/in/tian-xiao-4297a09/> and a true and correct webpage capture is attached
24 as **Exhibit 41**.

25 44. Attached as **Exhibit 42** is a true and correct webpage capture of the Aloy-Fortnite
26 Wiki-Fandom available at <https://fortnite.fandom.com/wiki/Aloy> (accessed on October 8, 2025).

27
28

1 45. Attached as **Exhibit 43** is a true and correct webpage capture of the MONSTER
2 HUNTER WORLD available at https://www.monsterhunter.com/world/us/topics/dlc_horizon/
3 (accessed on October 8, 2025).

4 46. Attached as **Exhibit 44.A** is a true and correct webpage capture of the PlayStation
5 Studios Opening Animation on YouTube available at
6 https://www.youtube.com/watch?v=UvXVA_ZLAWo (accessed on October 8, 2025). Attached as
7 **Exhibit 44.B** is a slipsheet indicating that the video appearing on this page is being lodged with the
8 Court in native format.

9 47. Attached as **Exhibit 45.A** is a true and correct webpage capture of the YouTube
10 LIGHT OF MOTIRAM page “From Destruction to Redemption – Rammasun – LIGHT OF
11 MOTIRAM Cinematic & Gameplay Trailer[,]” which was previously available at
12 <https://www.youtube.com/watch?v=6prk0Jxg7Cw> (accessed on July 25, 2025). Attached as
13 **Exhibit 45.B** is a slipsheet indicating that the video appearing on this page is being lodged with the
14 Court in native format.

15 48. Attached as **Exhibit 46.A** is a true and correct webpage capture of the YouTube
16 LIGHT OF MOTIRAM page “Mechanimal: AGNI” available at
17 https://www.youtube.com/watch?v=ncvh9_qISkk (accessed October 8, 2025). Attached as **Exhibit**
18 **46.B** is a slipsheet indicating that the video appearing on this page is being lodged with the Court
19 in native format.

20 49. Attached as **Exhibit 47.A** is a true and correct webpage capture of the YouTube
21 Light of Motiram – “Teaser Trailer” page available at
22 <https://www.youtube.com/watch?v=5IPmpZFdNP4> (accessed October 8, 2025). Attached as
23 **Exhibit 47.B** is a slipsheet indicating that the video appearing on this page is being lodged with the
24 Court in native format.

25 50. Attached as **Exhibit 48.A** is a true and correct webpage capture of the YouTube
26 page “Joris de Man – Aloy’s Theme – Horizon Forbidden West (Original Soundtrack) ft. Julie
27 Elven” available at <https://www.youtube.com/watch?v=0FllnTkXATI> (accessed on October 8,
28

1 2025). Attached as **Exhibit 48.B** is a slipsheet indicating that the video appearing on this page is
2 being lodged with the Court in native format.

3 51. Attached as **Exhibit 49.A** is a true and correct webpage capture of the YouTube
4 page “Horizon Zero Dawn – Launch Trailer – PS4” available at
5 <https://www.youtube.com/watch?v=wzx96gYA8ek> (accessed on October 8, 2025). Attached as
6 **Exhibit 49.B** is a slipsheet indicating that the video appearing on this page is being lodged with the
7 Court in native format.

8 52. Attached as **Exhibit 50** is a true and correct webpage capture of Tom Flint, Sound
9 on Sound, “Scoring Horizon Zero Dawn,” July 2017,
10 <https://www.soundonsound.com/techniques/scoring-horizon-zero-dawn> (accessed on October 8,
11 2025).

12 53. Attached **Exhibit 51** is a true and correct webpage capture of Gillen McAllister,
13 PlayStation.Blog, “The Making of Horizon Zero Dawn’s Machines” available at
14 <https://blog.playstation.com/2017/02/24/the-making-of-horizon-zero-dawns-machines/> (accessed
15 October 8, 2025).

16 54. Attached as **Exhibit 52** is a true and correct webpage capture of Holly Green, Paste
17 Magazine, “Best New Game Characters of 2017,” Dec. 13, 2017,
18 <https://www.pastemagazine.com/games/best-of-2017/the-best-new-games-characters-2017>
19 (accessed July 14, 2025).

20 55. Attached as **Exhibit 53.A** is a true and correct copy of the webpage capture of the
21 YouTube page “Horizon Zero Dawn – Inventing Instruments – PS4” available at
22 <https://www.youtube.com/watch?v=tGpVunSYuTs> (accessed October 8, 2025). Attached as
23 **Exhibit 53.B** is a slipsheet indicating that the video appearing on this page is being lodged with the
24 Court in native format.

25 56. Attached as **Exhibit 54** is a true and correct webpage capture of the article “How
26 Guerrilla Made a PlayStation Icon” available at [https://www.guerrilla-games.com/read/how-](https://www.guerrilla-games.com/read/how-guerrilla-made-a-playstation-icon)
27 [guerrilla-made-a-playstation-icon](https://www.guerrilla-games.com/read/how-guerrilla-made-a-playstation-icon) (accessed October 8, 2025).

28

1 57. Attached as **Exhibit 55** is a true and correct webpage capture of the Gematsu article
2 “Mechanical open-world survival crafting game Light of Motiram announced for PC [Update:
3 PS5, iOS, and Android]” available at [https://www.gematsu.com/2024/11/mechanical-open-world-](https://www.gematsu.com/2024/11/mechanical-open-world-survival-crafting-game-light-of-motiram-announced-for-pc)
4 [survival-crafting-game-light-of-motiram-announced-for-pc](https://www.gematsu.com/2024/11/mechanical-open-world-survival-crafting-game-light-of-motiram-announced-for-pc) (accessed October 8, 2025).

5 58. Attached as **Exhibit 56** is a true and correct copy of concept art that was
6 downloaded, at my direction, on July 25, 2025, from the Light of Motiram Press Kit. The Light of
7 Motiram Press Kit was previously accessible via the “Press Kit” link in the footer of the Light of
8 Motiram website, which linked to a Google Drive folder that was previously available at
9 https://drive.google.com/drive/folders/1BYko-j3kaLCZPI8HR_h0mQcgE7mCAsGu (accessed
10 July 25, 2025). The footer of the Light of Motiram website is visible in Exhibit 61, which is a
11 webpage capture of the Light of Motiram website as it existed on July 25, 2025, when the Google
12 Drive folder was accessed. A webpage capture of the Google Drive folder is attached as Exhibit
13 36.

14 59. Attached as **Exhibit 57** is a true and correct copy of a gameplay screenshot that was
15 downloaded, at my direction, on July 25, 2025, from the Light of Motiram Press Kit that was
16 previously available via a Google Drive link on the Light of Motiram website. The Light of
17 Motiram Press Kit was previously accessible via the “Press Kit” link in the footer of the Light of
18 Motiram website, which linked to a Google Drive folder that was previously available at
19 https://drive.google.com/drive/folders/1BYko-j3kaLCZPI8HR_h0mQcgE7mCAsGu (accessed
20 July 25, 2025). The footer of the Light of Motiram website is visible in Exhibit 61, which is a
21 webpage capture of the Light of Motiram website as it existed on July 25, 2025, when the Google
22 Drive folder was accessed. A webpage capture of the Google Drive folder is attached as Exhibit
23 36.

24 60. Attached as **Exhibit 58** is a true and correct copy of concept art that was
25 downloaded, at my direction, on July 25, 2025, from the Light of Motiram Press Kit that was
26 previously available via a Google Drive link on the Light of Motiram website. The Light of
27 Motiram Press Kit was previously accessible via the “Press Kit” link in the footer of the Light of
28

1 Motiram website, which linked to a Google Drive folder that was previously available at
2 https://drive.google.com/drive/folders/1BYko-j3kaLCZPI8HR_h0mQcgE7mCAsGu (accessed
3 July 25, 2025). The footer of the Light of Motiram website is visible in Exhibit 61, which is a
4 webpage capture of the Light of Motiram website as it existed on July 25, 2025, when the Google
5 Drive folder was accessed. A webpage capture of the Google Drive folder is attached as Exhibit
6 36.

7 61. Attached as **Exhibit 59** is a true and correct copy of concept art that was
8 downloaded, at my direction, on July 25, 2025, from the Light of Motiram Press Kit that was
9 previously available via a Google Drive link on the Light of Motiram website. The Light of
10 Motiram Press Kit was previously accessible via the “Press Kit” link in the footer of the Light of
11 Motiram website, which linked to a Google Drive folder that was previously available at
12 https://drive.google.com/drive/folders/1BYko-j3kaLCZPI8HR_h0mQcgE7mCAsGu (accessed
13 July 25, 2025). The footer of the Light of Motiram website is visible in Exhibit 61, which is a
14 webpage capture of the Light of Motiram website as it existed on July 25, 2025, when the Google
15 Drive folder was accessed. A webpage capture of the Google Drive folder is attached as Exhibit
16 36.

17 62. Attached as **Exhibit 60** is a true and correct webpage capture of the Light of
18 Motiram Facebook page available at
19 <https://www.facebook.com/photo/?fbid=122157031514328404&set=a.122100048092328404>
20 (accessed October 8, 2025).

21 63. Attached as **Exhibit 61** is a true and webpage capture of the LIGHTOFMOTIRAM
22 – Official Website, previously available at <https://lightofmotiram.com/EN/index.html#mech>
23 (accessed July 25, 2025).

24 64. Attached as **Exhibit 62** is a true and correct webpage capture of the Light of
25 Motiram Reddit page available at
26 <https://web.archive.org/web/20250601083502/https://www.reddit.com/r/LIGHTOFMOTIRAM/>
27 (accessed October 8, 2025).

28

1 65. Attached as **Exhibit 63.A** is a true and correct webpage capture of the Horizon Zero
2 Dawn – E3 2015 Trailer – PS4 available at <https://www.youtube.com/watch?v=Fkg5UVTsKCE>
3 accessed October 8, 2025). Attached as **Exhibit 63.B** is a slipsheet indicating that the video
4 appearing on this page is being lodged with the Court in native format.

5 66. Attached as **Exhibit 64.A** is a true and correct webpage capture of the YouTube
6 page “City on the Mesa - Horizon Zero Dawn (Original Soundtrack) Part 3 – Onwards to Meridian”
7 available at <https://www.youtube.com/watch?v=T7E-3W2r850> (accessed on October 8, 2025).
8 Attached as **Exhibit 64.B** is a slipsheet indicating that the video appearing on this page is being
9 lodged with the Court in native format.

10 67. Attached as **Exhibit 65.A** is a true and correct webpage capture of the YouTube
11 page “Horizon Zero Dawn – PSX 2016 Machines Trailer – PS4” available at
12 <https://www.youtube.com/watch?v=e7sm4i94mUY> (accessed on October 8, 2025). Attached as
13 **Exhibit 65.B** is a slipsheet indicating that the video appearing on this page is being lodged with the
14 Court in native format.

15 68. Exhibits 1 through 55, 60 through 65, and 68 were captured using the Page Vault
16 software. Attached as **Exhibit 66** is a true and correct copy of the Affidavit of Alexander J.W.
17 Sappington, Co-Chief Executive Officer at Page Vault, Inc. describing how these exhibits were
18 captured and verifying their authenticity.

19 69. Attached as **Exhibit 67** is a true and correct copy of the Light of Motiram Facebook
20 page captured on 6/11/25 at 4:48 PM, as indicated in the timestamp on the top left corner. This
21 copy was captured at my direction using Microsoft Print to PDF.

22 70. Attached as **Exhibit 68** is a true and correct copy of a screen capture of the
23 LIGHTOFMOTIRAM – Official Website available at
24 <https://web.archive.org/web/20250615093720/https://lightofmotiram.com/EN/index.html#mech>
25 (accessed August 8, 2025).
26
27
28

1 71. Attached as **Exhibit 69** is a true and correct copy of a July 28, 2025, letter from lead
2 counsel for SIE, Annette Hurst, to Brent R. Irvin, Esq., Vice-President & General Counsel of
3 Tencent Holdings Ltd. and President of Tencent America LLC.

4 72. Attached as **Exhibit 70** is a true and correct copy of an August 8, 2025, letter from
5 counsel for Defendants, Sy Damle.

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

8 Executed on this 16th day of October 2025, at Menlo Park, California.

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

/s/ Diana Rutowski
Diana Rutowski