

EXHIBIT B

Paramount/Axanar
202828-10048



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Via Messenger

October 3, 2016

Erin R. Ranahan
Winston & Strawn LLP
333 S. Grand Avenue, 38th Floor
Los Angeles, CA 90071-1543

Re: Paramount Pictures Corporation et al. v. Axanar Productions et al.

Dear Erin:

I am writing to meet and confer about the document production of defendant Alec Peters and defendant Axanar Productions (collectively, "Defendants"). The numbering on the Requests for Production below refer to the requests that were served on Axanar Productions; however, the discussion below also applies the corresponding Requests for Production to Alec Peters.

Affiliates and Owners of Axanar Productions

Request No. 1 seeks documents sufficient to identify YOUR owners, officers, directors, partners, shareholders, parent entities, affiliates, subsidiaries, and employees. These documents have not been produced for Axanar Productions. Please confirm that Defendants have produced all responsive documents. If Defendants have not produced all responsive documents, please let me know when they will be produced.

Scripts

Request No. 2¹ seeks all scripts and all versions of any script (whether complete or incomplete, and whether used or not used) used for or at any time intended for use in any of the AXANAR WORKS. While Defendants have produced some scripts, according to the numbering system on the scripts, Defendants have not produced each iteration of their script. For example, script numbers 3 and 6 were produced, yet scripts numbers 4 and 5 were not produced. Please confirm that Defendants have produced all scripts. If Defendants have not produced all responsive documents, please let me know when they will be produced.

Agreements With Third Parties

Request No. 9 seeks all agreements with third parties for services in connection with the production of the AXANAR WORKS, including but not limited to all DOCUMENTS reflecting payments to third parties with respect to such services. While Defendants have produced some

¹ The discussion for this Request for Production and all subsequent Requests also apply to the corresponding Requests that were served on Alec Peters.



agreements with third parties, Defendants have not produced the agreements for the actors other than Tony Todd, or with any of the crew to the extent that they exist. Please confirm that Defendants have produced all responsive documents. If Defendants have not produced all responsive documents, please let me know when they will be produced.

Ares Studio

Request No. 12 seeks all DOCUMENTS RELATING TO Ares Studio, including but not limited to all DOCUMENTS regarding the leasing and or purchase of the Studio, the ownership of the Studio, the construction of the Studio (including all financial documents), and the use of the Studio. Request No. 13 seeks all DOCUMENTS RELATING TO any future plans for Ares Studio, including but not limited to agreements, business plans, incorporation documents, and tax documents. Defendants have produced the lease and some construction information, but no information showing the proportional interests of the various people in the studio. Please confirm that Defendants have produced all responsive documents. If Defendants have not produced all responsive documents, please let me know when they will be produced.

Schedules

Request No. 14 seeks all DOCUMENTS setting forth any schedules associated with the making of the AXANAR WORKS, including writing and other pre-production schedules, production schedules and editing and other post-production schedules. Other than the Vulcan Scene, Defendants have not produced any schedules for the Axanar Works. Please confirm that Defendants have produced all responsive documents. If Defendants have not produced all responsive documents, please let me know when they will be produced.

All Partial and Complete Versions of the Axanar Works

Request No 16 seeks copies of all partial and complete versions of the AXANAR WORKS, including without limitation those film cuts and sequences which were filmed but have not yet been distributed. Defendants agreed to produce these documents at the parties' June 21, 2016 meet and confer. Defendants have not produced any partial versions of any scenes. Please confirm that Defendants have produced all partial versions of the Axanar Works, including rough cuts. If Defendants have not produced all responsive documents, please let me know when they will be produced.

Communications Relating to the Axanar Works

Request No. 17 seeks all COMMUNICATIONS with third parties RELATING TO the AXANAR WORKS. Request No. 18 seeks all COMMUNICATIONS, both public and private, RELATING TO the AXANAR WORKS. Plaintiffs are certain that Defendants have not produced all of these communications, because at the very least Defendants have not produced Peters' communications with CBS. In fact, Defendants have produced under 200 emails about the Axanar production that are not from or to donors. If Defendants have not produced all responsive documents, please let me know when they will be produced.

Communications with Actors



Request No. 19 seeks all COMMUNICATIONS with actors RELATING TO the AXANAR WORKS, including but not limited to all agreements with actors. The only agreement with an actor that Defendants have produced is the agreement with Tony Todd. Please confirm that there are no other agreements in existence. Moreover, Defendants have not produced any communications with actors. Please confirm that Defendants have produced all responsive documents. If Defendants have not produced all responsive documents, please let me know when they will be produced.

Communications With Robert Meyer Burnett

Request No. 22 seeks all COMMUNICATIONS with Robert Meyer Burnett RELATING TO the AXANAR WORKS. Defendants have produced only about ten emails that include Robert Meyer Burnett. Please confirm that there are no other emails.

Communications with Diana Kingsbury

Request No. 23 seeks all COMMUNICATIONS with Diana Kingsbury RELATING TO the AXANAR WORKS. Defendants have produced communications between Ms. Kingsbury and donors, but Defendants have not produced any communications between Mr. Peters and Ms. Kingsbury. Please confirm that there are no emails in existence that you have not produced.

Communications Relating to the Axanar Works

Request No. 24 seeks all COMMUNICATIONS with Terry McIntosh RELATING TO the AXANAR WORKS. Request No. 25 seeks all COMMUNICATIONS with Alexander Bornstein RELATING TO the AXANAR WORKS. Request No. 26 seeks all COMMUNICATIONS with Bing Bailey RELATING TO the AXANAR WORKS. Request No. 27 seeks all COMMUNICATIONS with Bill Hunt RELATING TO the AXANAR WORKS. Request No. 28 seeks all COMMUNICATIONS with Michael Spatola RELATING TO the AXANAR WORKS. Request No. 29 seeks all COMMUNICATIONS with Frank Serafine RELATING TO the AXANAR WORKS. Request No. 30 seeks all COMMUNICATIONS with Adam Howard RELATING TO the AXANAR WORKS. Defendants have produced almost no email communications with these individuals. Please confirm that Defendants have produced all responsive documents.

Social Media Postings

Request No. 31 seeks all DOCUMENTS RELATED TO any postings YOU have made on social media, message boards, or any other website RELATED TO this ACTION, the AXANAR WORKS, the STAR TREK COPYRIGHTED WORKS, or PLAINTIFFS. Defendants have not produced these documents, despite their large social media presence. Please let me know when they will be produced.

Documents Relating to Plaintiffs

Request No. 32 seeks all DOCUMENTS RELATING TO PLAINTIFFS. Request No. 33 seeks all COMMUNICATIONS with PLAINTIFFS. Request No. 34 seeks all DOCUMENTS RELATING TO any COMMUNICATIONS YOU had with any PLAINTIFFS. Request No. 35 seeks all



COMMUNICATIONS RELATING TO this ACTION. Defendants did not produce any communications between Peters and Plaintiffs, nor any documents related to such communications. Defendants provided very few communications relating to this action. Please let me know when these documents will be produced.

Star Trek

Request No. 36 seeks all DOCUMENTS RELATING TO Star Trek and/or the STAR TREK COPYRIGHTED WORKS. Request No. 37 seeks all DOCUMENTS RELATING TO the rights to Star Trek and/or the STAR TREK COPYRIGHTED WORKS. Request No. 42 seeks all DOCUMENTS RELATING TO any research conducted on Star Trek and/or the STAR TREK COPYRIGHTED WORKS in connection with the AXANAR WORKS. Request No. 43 seeks copies of all works RELATING TO Star Trek that YOU currently have in YOUR possession, custody, or control, or that YOU reviewed in connection with work performed by YOU on the AXANAR WORKS. Request No. 44 seeks copies of works utilized or relied upon by YOU in the creation of the AXANAR WORKS, including books, films, or television shows. Request No. 47 seeks all pre-existing writings or audio-visual works upon which any AXANAR WORKS is based, and/or out of which any such AXANAR WORKS arose. At the parties' June 21, 2016 meet and confer, Defendants agreed to produce any Star Trek works that were marked up, interlineated, or commented upon by Defendants to be turned over to evidence the writings placed on those works. Please confirm that all such documents have been produced.

Expenditures

Request No. 39 seeks all DOCUMENTS RELATING TO the expenditure of funds on the AXANAR WORKS. Request No. 40 seeks all DOCUMENTS RELATING TO how funds of investors in the AXANAR WORKS was spent. Request No. 41 seeks all DOCUMENTS showing which individuals received money with respect to the AXANAR WORKS, and how much money they received.

Defendants only produced one document relating to the expenditures on the Axanar Works, a document that was designated "Highly Confidential." Plaintiffs are certain that not all responsive documents have been produced because Defendants have not produced "The Axanar Annual Report 2015 Revised," a document that Plaintiffs have produced to Defendants. Please confirm that Defendants will produce all responsive documents, including all versions of all annual reports, and let me know when they will be produced.

Communications With YouTube and Kickstarter

Request No. 52 seeks all COMMUNICATIONS with Youtube.com RELATING TO the AXANAR WORKS. Request No. 65 seeks all COMMUNICATIONS with Kickstarter RELATING TO the AXANAR WORKS. No such communications were produced. Please confirm that all responsive documents have been produced. If Defendants have not produced all responsive documents, please let me know when they will be produced.

Monetization of the Axanar Works and Materials Distributed in Connection With the Axanar Works



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Request No. 53 seeks all DOCUMENTS RELATING TO any efforts to monetize the AXANAR WORKS. Request No. 54 seeks all DOCUMENTS showing revenue of the AXANAR WORKS. Request No. 55 seeks all DOCUMENTS RELATING TO the sale or distribution of products or any physical materials RELATING TO the AXANAR WORKS. Request No. 56 seeks all DOCUMENTS regarding the design, manufacture, sale, and other distribution of products or any physical materials RELATING TO the AXANAR WORKS, including but not limited to all products sold through the Axanar store, and all products given to any donors of Axanar, or any other person. Defendants have produced very limited information regarding the physical materials that were distributed in conjunction with the Axanar Works. Please confirm that all responsive documents have been produced. If Defendants have not produced all responsive documents, please let me know when they will be produced.

Finally, Defendants produced a document bates labeled AX030915-AX031129 that they designated "Highly Confidential," and therefore for Attorney's Eyes Only. A document relating to the expenditures of donor funds on the Axanar Works and other items is not highly confidential. There is no sensitive business information in this document, and no risk that this document could be exposed to potential "competitors." Please re-designate this document as not being "Highly Confidential," or please explain the basis for the designation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer Jason'.

Jennifer Jason
Attorney At Law