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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

PARAMOUNT PICTURES CORPORATION, a Delaware corporation; and CBS STUDIOS INC., a Delaware corporation,

Plaintiffs,

v.

AXANAR PRODUCTIONS, INC., a California corporation; ALEC PETERS, an individual, and DOES 1-20,

Defendants.

Case No.: 2:15-cv-09938-RGK-E

[PROPOSED] ORDER GRANTING PLAINTIFFS' UNOPPOSED APPLICATION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

[PROPOSED] ORDER GRANTING APPLICATION FOR LEAVE TO FILE UNDER SEAL ISO OPPOSITION TO DEFENDANTS' MSJ

1 Having considered Plaintiffs’ Unopposed Application for Leave to File
2 Documents Under Seal in Support of Plaintiffs’ Opposition to Defendants’ Motion
3 for Summary Judgment.

4 **IT IS HEREBY ORDERED**, pursuant to Local Rule 79-5.2.2, that the
5 following documents shall be filed under seal:

<u>Document</u>
<p>8 1. Exhibit A to the Declaration of David Grossman (“Grossman 9 Declaration”) (excerpts from the deposition transcripts of Alec Peters taken on 10 October 19, 2016 and November 2, 2016), which Defendants designated 11 “Confidential” and for some portions “Highly Confidential” pursuant to the 12 terms of the Stipulated Protective Order entered by this Court on July 12, 13 2016. <u>See</u> Dkt. 53.</p>
<p>15 2. Exhibit B to the Grossman Declaration (excerpts from the 16 deposition transcript of Robert Meyer Burnett taken on October 11, 2016), 17 which Defendants designated “Confidential” pursuant to the terms of the 18 Stipulated Protective Order entered by this Court on July 12, 2016. <u>See</u> Dkt. 19 53.</p>
<p>21 3. Exhibit D to the Grossman Declaration (excerpts from the 22 deposition transcript of Diana Kingsbury taken on October 12, 2016), which 23 Defendants designated “Confidential” pursuant to the terms of the Stipulated 24 Protective Order entered by this Court on July 12, 2016. <u>See</u> Dkt. 53.</p>
<p>26 4. Exhibit K to the Grossman Declaration (a document stating that 27 <i>Prelude to Axanar</i> was viewed 2,540,365 times on YouTube), which</p>

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Defendants designated “Confidential” pursuant to the terms of the Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

5. **Exhibit N** to the Grossman Declaration (a brochure for a screening of *Prelude to Axanar*, which shows images of *Prelude to Axanar*), which Defendants designated “Confidential” pursuant to the terms of the Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

6. **Exhibit P** to the Grossman Declaration (November 25, 2012 email exchange between Alec Peters and Christian Gossett), which Defendants designated “Confidential” pursuant to the terms of the Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

7. **Exhibit V** to the Grossman Declaration (blueprints for the soundstage at Paramount Studios that was used for *Star Trek: The Original Series*), which Defendants designated “Confidential” pursuant to the terms of the Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

8. **Exhibit W** to the Grossman Declaration (blueprints from the set of *Star Trek: Deep Space Nine*), which Defendants designated “Confidential” pursuant to the terms of the Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

9. **Exhibit AA** to the Grossman Declaration (version 7.7 of the Axanar Script, dated November 26, 2015), which Defendants designated “Confidential” pursuant to the terms of the Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

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10. **Exhibit JJ** to the Grossman Declaration (Axanar press kit), which Defendants designated “Confidential” pursuant to the terms of the Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

11. **Exhibit KK** to the Grossman Declaration (February 11, 2013 email from Alec Peters to Doug Drexler), which Defendants designated “Confidential” pursuant to the terms of the Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

12. **Exhibit NN** to the Grossman Declaration (lease), which Defendants designated “Highly Confidential” pursuant to the terms of the Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

13. **Exhibit PP** to the Grossman Declaration (Axanar marketing plan), which Defendants designated “Confidential” pursuant to the terms of the Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

14. **Exhibit SS** to the Grossman Declaration (financial summary), which Defendants designated “Confidential” pursuant to the terms of the Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

15. **Exhibit CCC** to the Grossman Declaration (excerpts from the deposition transcripts of John Van Citters taken on September 28, 2016 and

1 Dan O'Rourke taken on September 30, 2016), which Plaintiffs designated
2 "Confidential" pursuant to the terms of the Stipulated Protective Order entered
3 by this Court on July 12, 2016. See Dkt. 53.

4 16. **Exhibit FFF** to the Grossman Declaration (November 2015 email
5 exchange), which Defendants designated "Confidential" pursuant to the terms
6 of the Stipulated Protective Order entered by this Court on July 12, 2016. See
7 Dkt. 53.

8 17. **Exhibit III** to the Grossman Declaration (March 2016 email
9 exchange that includes Peters' Reddit post), which Defendants designated
10 "Confidential" pursuant to the terms of the Stipulated Protective Order entered
11 by this Court on July 12, 2016. See Dkt. 53.

12 18. **Exhibit KKK** to the Grossman Declaration (excerpts from the
13 deposition transcript of J.J. Abrams taken on November 9, 2016), which
14 Plaintiffs designated "Confidential" pursuant to the terms of the Stipulated
15 Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

16 19. **Exhibit LLL** to the Grossman Declaration (excerpts from the
17 deposition transcript of Justin Lin taken on November 7, 2016), which Plaintiffs
18 designated "Confidential" pursuant to the terms of the Stipulated Protective
19 Order entered by this Court on July 12, 2016. See Dkt. 53.

20 20. Plaintiffs' unredacted Opposition to Defendants' Motion for
21 Summary Judgment, which quotes from and/or references the foregoing.

22 21. The unredacted Grossman Declaration, which quotes from and/or
23 references the foregoing.

24 22. Plaintiffs' unredacted Statement of Genuine Issues in Opposition
25 to Motion for Summary Judgment, which quotes from and/or references the
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foregoing.

23. Plaintiffs' unredacted Objections to Defendants' Evidence Submitted in Support of Defendants' Motion for Summary Judgment, which quotes from and/or references the foregoing.

Dated: _____

Hon. R. Gary Klausner
United States District Judge