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AXANAR PRODUCTIONS, INC.,
8 and ALEC PETERS

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11
12 PARAMOUNT PICTURES
CORPORATION, a Delaware
13 corporation; and CBS STUDIOS INC., a
Delaware corporation,

14 Plaintiffs,

15 vs.

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

18 Defendants.
19

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

Assigned to: Hon. R. Gary Klausner

**DECLARATION OF ERIN R.
RANAHAN IN OPPOSITION TO
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

Date: 12/19/16
Time: 9:00 a.m.
Place: Courtroom 850, 8th Floor
255 East Temple Street
Los Angeles, CA 90012
Judge: Hon. R. Gary Klausner

Original Complaint Filed: 12/29/15
First Amended Complaint Filed: 3/11/16

DECLARATION OF ERIN R. RANAHAH

1
2 1. I am an attorney at Winston & Strawn LLP, counsel for Defendants
3 Axanar Productions, Inc. and Alec Peters in the above-entitled action. I have personal
4 knowledge of the matters set forth herein, and if called upon as a witness I could
5 competently testify thereto.

6 2. **Exhibits A and B** to my declaration are true and correct copies of
7 Plaintiffs’ Responses to Defendants’ Requests for Production, Set One, dated May 23,
8 2016.

9 3. **Exhibit C** to my declaration is a true and correct copy of excerpted pages
10 from the transcript of John Van Citters, taken on September 28, 2016.

11 4. **Exhibit D** to my declaration is a true and correct copy of excerpted pages
12 from the transcript of the deposition of Robert Meyer Burnett, taken on October 11,
13 2016.

14 5. **Exhibit E** to my declaration is a true and correct copy of excerpted pages
15 from the transcript of the deposition of Christian Gossett, taken on October 22, 2016.

16 6. **Exhibit F** to my declaration is a true and correct copy of excerpted pages
17 from the transcript of Daniel O’Rourke, taken on September 30, 2016.

18 7. Plaintiffs’ counsel did not meet and confer with us pursuant to Local
19 Rule 7-3 with respect to seeking injunctive relief in connection with their motion for
20 partial summary judgment. A true and correct copy of my correspondence with
21 Plaintiffs’ counsel regarding the matter is attached hereto as **Exhibit G**.

22 8. **Exhibit H** to my declaration is a true and correct copy of Wikipedia
23 definition of “mockumentary” as of November 28, 2016.

24 I declare under the penalty of perjury that the foregoing is true and correct.
25 Dated this 28th day of November, 2016 at Los Angeles, California.

26
27 /s/ Erin R. Ranahan

28 Erin R. Ranahan