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PARAMOUNT PICTURES
11 CORPORATION and CBS STUDIOS
INC.
12

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15

16 PARAMOUNT PICTURES
CORPORATION, a Delaware
17 corporation; and CBS STUDIOS INC.,
a Delaware corporation,
18

19 Plaintiffs,

20 v.

21 AXANAR PRODUCTIONS, INC., a
California corporation; ALEC PETERS,
an individual, and DOES 1-20,
22

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

**DECLARATION OF JENNIFER
JASON IN SUPPORT OF
PLAINTIFFS' MOTION IN
LIMINE NO. 1 TO EXCLUDE
ALTERED FINANCIAL
STATEMENT AND ITS
CONTENTS, OR ANY OF THE
POST-LITIGATION
TRANSACTIONS REFLECTED
THEREIN**

Discovery Cutoff: November 2, 2016
Pre-Trial Conference: January 9, 2017
Trial: January 31, 2017

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DECLARATION OF JENNIFER JASON

I, JENNIFER JASON, declare as follows:

1. I am an attorney licensed to practice law in the State of California and am an associate with the law firm of Loeb & Loeb LLP (“Loeb”), attorneys of record for Paramount Pictures Corporation and CBS Studios Inc. (collectively, “Plaintiffs”) in the above-captioned matter. The following is of my own personal knowledge, and if called as a witness, I could and would competently testify thereto.

2. On December 9, 2016, the parties met and conferred about this motion in limine.

3. Plaintiffs filed this action on December 29, 2015. *See* Dkt. 1 (Complaint).

4. **Exhibit A** (a confidential document filed under seal) is a true and correct copy of excerpts from the deposition transcripts of Alec Peters taken on October 19, 2016 and November 2, 2016 (referred to herein as “Peters tr.).

5. Mr. Peters testified that [REDACTED]. *See Exhibit A* (Peters tr. at 70:24-71:4; 190:19-191:24). [REDACTED]. *See Exhibit A* (Peters tr. at 192:3-193:21).

6. Mr. Peters used [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. See **Exhibit A** (Peters tr. at 189:2-23; 122:21-25; 65:7-18; 193:22-194:18; 209:15-212:22; 195:21-198:1; 213:5-10; 201:6-204:7; 204:11-16; 205:3-16; 203:25-204:1; 217:6-15; 205:14-16; 205:20-207:9; 207:10-12; 208:2-16). In response to Plaintiffs’ document requests in this case, Defendants produced a financial summary that includes line items for these expenditures. **Exhibit B** (confidential document filed under seal) is a true and correct copy of the financial summary document produced by Defendants.

7. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. See **Exhibit A** (Peters tr. at 393:15- 396:7; 398:24-399:10; 401:7-403:5).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. **Exhibit C** (confidential document filed under seal) is a true and correct copy of the altered financial statement.

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

Executed this 16th day of December, 2016, at Los Angeles, California.

/s/Jennifer Jason
Jennifer Jason