

EXHIBIT A

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

Assigned to: Hon. R. Gary Klausner

**DECLARATION OF REECE
WATKINS IN SUPPORT OF
DEFENDANTS' 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

1. I am a current member of the Axanar Fan Group on Facebook. I have personal knowledge of the matters set forth herein, and if called upon as a witness I could competently testify thereto.

3. I am a fan of Star Trek. I saw the most recent film, *Star Trek: Beyond*, in theatres, and I also purchased the collector's edition of *Star Trek: Beyond* on pre-order.

4. Prior to viewing *Star Trek: Beyond*, I watched the fan film, *Prelude to Axanar*. The fan film rekindled my interest in the *Star Trek* franchise, and I purchased additional official, *Star Trek*-licensed props and costumes following its release, including, but not limited to: (a) The Original Series [TOS] phaser, communicator, and tricorder; (b) an Anovos tunic; and (c) Blue-Ray remasters.

5. I specifically made these purchases, worth several hundred dollars, because *Prelude to Axanar* rekindled my interest in the *Star Trek* franchise, and would not have these purchases but for watching the fan film.

I declare under the penalty of perjury that the foregoing is true and correct. Dated this 16 th day of November, 2016 at Warner Robins, Georgia.

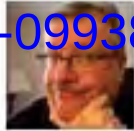
Reece Watkins

Reece Watkins

EXHIBIT 1 TO WATKINS DECLARATION

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Reese Watkins

October 25 at 11:31am

The emails take a back burner to the real backbreaker in Axanar's victory-- CBS/P are now under a court order to demonstrate EXACTLY how a twenty-minute fan film damaged them in ANY way, financially. Of course they won't be able to, because even if every single dollar donated were a protest dollar deliberately spent to injure CBS, Beyond pulled in \$300 million at the box office. \$1.3 million is a third of one percent of that, and well within any margin of doubt. That's not even counting the merchandising and video income yet to roll in. That's the best possible case for the plaintiffs, and it isn't even close to being true. I saw Beyond in the theater, have the collector edition of the BluRay on pre-order, and I didn't even particularly LIKE the movie all that well. However...

BECAUSE of Prelude to Axanar, my interest in Star Trek has been renewed. Since it came out, I've purchased quite a few licensed products, like TOS phaser, communicator, tricorder, models, BluRay remasters, and a \$200 Anovos tunic, which I probably wouldn't have if it weren't for Axanar. All together, I've spent more on licensed Star Trek Merchandise than I donated in all three crowdfunding rounds put together. So that's pretty much it for the ideal "protest dollar" theory.

Am I alone here? Did Axanar rekindle anyone else's love for Star Trek? More importantly, before all this lawsuit junk, did Axanar stop you from buying Trek stuff, or get you to buy MORE?



Like



Comment

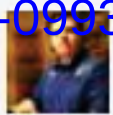


132

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Brian C. McKinley Probably said before, but if anything Axanar restored faith in Trek after the horror show JJ Pegg made.

Like · Reply · 3 · October 25 at 5:40pm



Rob Toohey I've always loved Star Trek. Although I think there's no real way any of the fan films can injure CBS/P.

Like · Reply · 3 · October 25 at 5:40pm



David Gargan I donated .. I watch the updates with interest. Nothing would sway my love of Star Trek. I just really want to see the story of Axanar. I don't care who makes it. They need to make this go away so we can see this story and move on

Like · Reply · 1 · October 25 at 5:43pm



Robert Clontz I have been a die-hard fan of Star Trek since I was a little boy, growing up in the 60s. "Prelude to Axanar", and everything associated with it, just helped me realize that when I leave this big blue marble of ours, I want to be placed inside a Mark IV Photon Torpedo, and fired off out of the solar system. Warp Speed!!!

Like · Reply · 2 · October 25 at 5:44pm



Gregory Lussier Said it maybe a thousand times before. Show the judge Troops and then ask if Lucas lost money from Star Wars because of that. They even put the link on the official website!!!

Like · Reply · 2 · October 25 at 5:46pm



Mark Wengler Axanar is making a Star Trek film the fans want. But CBS and Paramount don't like that.

Like · Reply · 2 · October 25 at 5:48pm



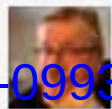
Brian Hansen It sure did, and I showed it to more than 30 people, all seemed to enjoy.

Like · Reply · 2 · October 25 at 5:49pm

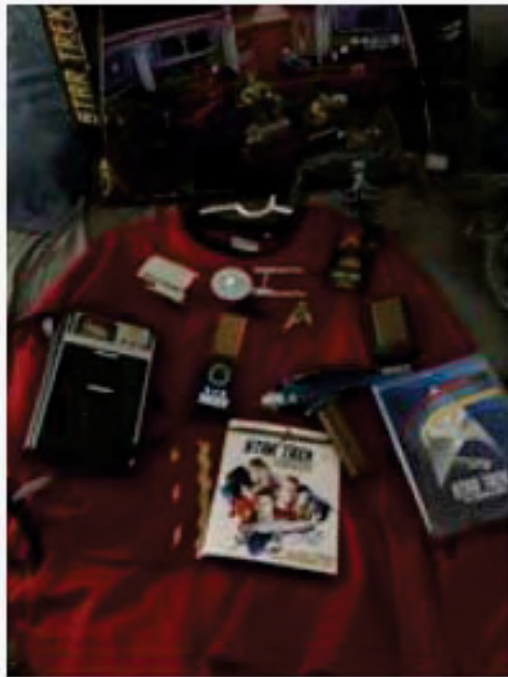


Vernon L. Vincent I can't say I bought a lot of Star Trek stuff before (although I did get a snazzy engineering bathrobe for Christmas a few years ago, along with some cufflinks and a tiebar. But my purchasing habits haven't been impacted by Axanar in the slightest.

Like · Reply · 2 · October 25 at 5:51pm

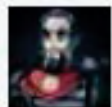


Reece Watkins Here's a sampling of the official Star Trek Licensed Merchandise I've purchased since I realized that Axanar came out. I wouldn't have bought all this if it weren't for Axanar, period.



Like · Reply · 10 · October 25 at 5:51pm

Brad McNeill replied · 2 Replies



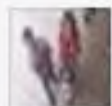
Mat Shafer I had all but given up on it. Axanar renewed my past love. I consider it the gateway drug that sucked me back in. I then used the links and recommendations or find other equally impressive fan works that satisfy an itch the "official" works have yet to do. I've gone so far as to rewatch every iteration in chronological order.

Like · Reply · 4 · October 25 at 5:53pm



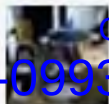
Alexander Richardson I tell you what made me stop buying official merch: The law suit. Not Axanar, not Alec, not Kelvinverse. The Neanderthal tactics of CBS have turned me away from Star Trek.

Like · Reply · 4 · October 25 at 5:53pm · Edited



Joe Schluttenhofer The lawsuit itself soured my attitude toward ST: Beyond. I still went to see it but have no desire to own the DVD.

Like · Reply · 3 · October 25 at 6:10pm



Doug Clark I went to Beyond in the theatres and I re-ordered the Blu-ray from Amazon. Alec Peters actually convinced me to go to the movie despite my reticence after the lawsuit. Now if I hadn't been lied to by CBS/P about the lawsuit being dropped I probably would have gone and seen it 4 or 5 times in the theatres. It was the lawsuit and lies that sucked the enthusiasm out of me. Axanar keeps me excited about Star Trek despite CBS/P efforts to destroy fandom and fan movies.

Like · Reply · 5 · October 25 at 6:13pm · Edited



Susanna Chisholm When I was exposed to the Prelude to Axanar, I was more gung ho then and was more getting ready to donate to Axanar...because of the lawsuit not sure if too late to donate? Under the circumstances (lawsuit) feel a sense of less passion--for lack of expression. FYI, there was a character in Prelude that really captured my mind... when you like anything and support (whether Axanar or Renegades or a fan for particular actor because of the character, etc.), it's natural to want souvenirs. Thank you for listening...

Like · Reply · 1 · October 25 at 6:13pm · Edited



Michael Maier My love of Star Trek has never dropped. Only thing that's ever stopped me from the instant gratification of buying things is too many bills and debts that need my attention first.

Like · Reply · 1 · October 25 at 6:13pm



Charles Britto My love for purchasing licensed Star Trek merchandise had taken a dive UNTIL I discovered Axanar, and my love of Trek was rekindled. I watched Beyond because **Alec Peters** suggested it was what a Trekkie should do. I'm glad I did. I have continued to support CBS/Paramount out of my pocket because in spite of the lawsuit, like Alec, I believe Star Trek is Star Trek, and the suits will never kill that in my mind....and in my Katra.

Like · Reply · 3 · October 25 at 6:31pm



Thomas West replied · 1 Reply



Michael J. Simmons Does anyone know of a way to file a statement or friend of the court to show the court how we the fans have felt about this and how it is we have spent our money?

Like · Reply · 1 · October 25 at 6:58pm



Rick Honey I'd have to agree. Axanar completely resparked my interest in the TOS era Trek... without it, I'd likely not be interested in Discovery at all.

Like · Reply · 1 · October 25 at 7:13pm



Aaron Gershoff Stop with the logic. The haters have a problem with it.

(Yes, I rewatched the entire TOS series again after seeing Prelude, and bought some tchotchkes.)

Like · Reply · 2 · October 25 at 7:20pm



Mark Heber Very much so.

Like · Reply · 1 · October 25 at 7:28pm



Clinton Rowley Axanar definitely got me more invested in Trek!

Like · Reply · 2 · October 25 at 7:47pm



Karl Maurer Prelude to Axanar was one of the things that kicked my 'trekie' genes back into high gear. Because of it, I started reviewing all the old episodes, movies, etc and got EXCITED about the then upcoming 50th anniversary and getting all hyped about Beyond and what series CBS might come up with. It was only CBS/P's apparent dropping of the 50th anniversary ball that started to dampen that as 2016 came into full focus... then them going and throwing a lawsuit at the very people that made this thing that reawakened things... that is what dampened my spirits. Not Prelude, but how the 'official' holders seemed to want to snuff out the celebration of the very thing that, as a kid, got me excited about science, space, books, etc. So I still don't see how these CBS/P execs can see Prelude and the (hopefully one day produced) Axanar film as something that would HARM them and the franchise. Yes, I could see them asking for license fees and the like. But slapping it down without even a cease and desist notice???

Like · Reply · 2 · October 25 at 7:50pm



Susanna Chisholm PS: It is important to connect to your most passionate fans...don't you think? It gives me/them/us a purpose. You might be a fan of Star Trek anyway before Prelude to Axanar; but I AM a passionate fan of Vulcan Ambassador Soval BECAUSE from watching Prelude to Axanar. So don't push this pink skins to the thin ice...


Like · Reply · 1 · October 25 at 7:59pm · Edited



Richard McCall Fan films are free advertising, free fan fuel, and drive my buying official merchandise all the time. Instead of suing them, they should thank them.


Like · Reply · 2 · October 25 at 9:46pm

Robert Carnegie Yes Axanar did it for me too. I got into the online game again because of Axanar. I wasn't even going to play it again till Axanar came out. CBS can thank them because i became a life member of the game now and spent more on it by 3 times than i spent on Axanar. I won't however pay to see their poorly designed show though. That POS ship i seen is an atrocious design. Still, even though Beyond wasn't that good of a movie, i bought the digital version of it. Unless they can bring a story of the magnitude and great story line to tv like Axanar was going to put online for free, then Star Trek as a series is dead.

Like · Reply ·  1 · October 25 at 9:48pm




Tim Hancock Axanar kept my interest going with Star Trek. And yes I've spent money on CBS/P stuff due to my continued interest. Axanar helped, it did not hinder.

Like · Reply ·  1 · October 25 at 9:52pm



Eric L. Watts "Star Trek Nemesis" was a dismal failure. "Star Trek Enterprise" was an abomination. "Star Trek Lens Flare" was an outright betrayal. After 10 years of being constantly disappointed with Paramount's product, I had pretty much given up hope of ever being happy with any new Star Trek, and resigned myself to being content with the first four TV series.

Then came Axanar. FINALLY, somebody who knew what Star Trek was put out a 20-minute fan film that proved it could still be done, and done right. Axanar proved that STAR TREK LIVES.


Like · Reply ·  6 · October 25 at 10:36pm · Edited

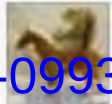


Steven Mayhew replied · 3 Replies



Mat Shafer Eric I respectfully disagree on Enterprise. I was one of the few who bore the brunt of the hate for defending it at the time, because I read the interview in the TV Guide at the time where they explained it would start off looking out of sync with TOS, but reasons would start to be addressed down the road, which they did folding in First Contact, as well as setting in stone the reason TOS Klingons were not ridged. Remember before this all we had was Worf saying simply "we do not speak of them". Granted the Expanse ground on and on losing the momentum but the series paid off and sits nicely if you watch it in chronological order with the other series, which in am 2/3 through just wrapping up the last season of TNG and the simultaneous parts of DS9

Like · Reply ·  7 · October 25 at 11:06pm



Tristan Erickson Prelude definitely rekindled my Trek passion. It was always there, but it had been a little dimly back in later for many years and other interests, Axanar brought my Trek back with a screaming fury. If nothing more ever comes from Alec and Crew, I am forever in their debt for what they have already done and for reminding me how great Trek can be.

Like · Reply · 2 · October 25 at 11:06pm



Lee W. Benjamin I liked Beyond, but #IStandWithAxanar!

Like · Reply · 4 · October 25 at 11:23pm



Jean-Francois Éthier All the lawsuit put cbs at a discustin point for me....i was hype when all were going well for beyond and axanar...then the lawsuit happened and ive boycut Beyond for all it matter, havnt seen it to this day...im not even sure if i will watch discory at this point

Like · Reply · 2 · October 25 at 11:54pm · Edited



Fred Archer I hate the jitrek crap and saw the movie for free. however, fan films as a whole and prelude specifically renewed my interest in trek, prelude certainly upped the bar on what i expect from trek. Now, as of today, i own every IDW trek comic except 3, and i even started reading a few of the books.

Like · Reply · 1 · October 26 at 1:29am



Jeff Craig Always loved Trek, but once CBS settles the suit I look forward to buying some of those Eaglemoss Starships!

Like · Reply · 2 · October 26 at 2:37am



Fred Archer replied · 1 Reply



Mark Hitchins Without doubt, Axanar boosted my interest, but the big difference was in ramping up the excitement factor..... it found some of the magic lost in the recent movies.

Like · Reply · 2 · October 26 at 2:42am



Fred Archer replied · 3 Replies



Rick Newton For a 3 1/2 year unemployed individual it really was "status quo."

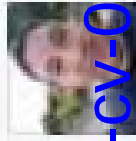
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but the big purchases that I used to have had to be discontinued. Not because of the "NuTrek," but because of "budget constraints."

My enthusiasm for all things Trek has always been for TOS items. TNG, Voyager and DS9, I watched but have bought very little associated with these shows (a model or two of the "lead ships" from each series). I have avoided purchasing anything associated with Enterprise -- I watched for a while, but when this show deviated so strongly from the already laid out "past of the future" as described in TOS, etc., it became too annoying to watch and follow. Regarding the "NuTrek," I've just been unable to reconcile how it has been done to find myself interested in it. I went to the 2009 reboot, and saw the second one on TV, but... they just don't feel like "genuine" Trek to me.

In other words, Axanar brought back the excitement of Trek that I have for TOS, but money concerns and a lackluster interest in the reboot movie series (not because of Axanar) are why my dollars haven't gone to CBS/Paramount of late (though CBS does get my dollars in the form of TOS books).

Like · Reply · 2 · October 26 at 3:04am · Edited



Jose Gomez The lawsuit definitely made me curtail my Trek spending. I feel
never been a threat against a major franchise. The problem is when the major
franchise keeps making mediocre films such as Final Frontier, Generations,
Insurrection, Nemesis, Into Darkness, & Beyond? It leads to franchise fatigue &
disinterest from the community. These were subpar films that didn't live up to the
Trek standard.

Just watching one of the good films or a good episode of any of the TV series,
& you can clearly see the difference in writing, details, quality, & presentation. If
Beyond was so good, why didn't it gross \$1 billion bucks or more? Because it
wasn't worthy of being that kind of grossing film. None of the Kelvin films have
come close. In my opinion, the attempt to infuse Star Trek with elements of Star
Wars, Galaxy Quest, & bits of Battlestar Galactica have backfired.

There's something unique & wonderful about Star Trek that should change
organically but not to suit some corporate suits pocket books. That's my biggest
problem. CBS/P want to change Trek into something that it is not. It's not sci-
fantasy. It's not an action film. It's just pure science ficiton with elements of
others complementing the story. What Trek needs is a return to roots while
respecting the source material. You can still play in Gene's universe without
taking a wrecking ball to it.

Like · Reply · 4 · October 26 at 6:48am



Like · Reply · 1 · October 26 at 7:39am

Kevin F. Casey I wonder If It can be shown that the Lawsuit Not Axanar
Caused Netflix to reduce their offer would that have any effect on the
judgement either way?

Like · Reply · 1 · October 26 at 9:40am

Chris Hermann I've lost almost all of my interest in official Star Trek and
haven't bought anything for quite some time. This has nothing to with fan films
though. The studios are not making stuff I want to see, and the treatment of
fans and fan film groups has turned me off the idea of spending any money all
the more. The studios have only themselves to blame for any loss of profit.

Like · Reply · 2 · October 26 at 9:46am