

1 LOEB & LOEB LLP
DAVID GROSSMAN (SBN 211326)
2 dgrossman@loeb.com
JENNIFER JASON (SBN 274142)
3 jjason@loeb.com
10100 Santa Monica Blvd., Suite 2200
4 Los Angeles, CA 90067
Telephone: 310.282.2000
5 Facsimile: 310.282.2200

6 LOEB & LOEB LLP
JONATHAN ZAVIN (admitted *pro hac vice*)
7 jzavin@loeb.com
345 Park Avenue
8 New York, NY 10154
Telephone: 212.407.4000
9 Facsimile: 212.407.4990

10 Attorneys for Plaintiffs
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.
24

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

**PLAINTIFFS' UNOPPOSED
APPLICATION FOR LEAVE TO
FILE DOCUMENTS UNDER
SEAL RE: MEMORANDUM OF
CONTENTIONS OF FACT AND
LAW**

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

25
26
27
28

1 By and through their undersigned counsel, and pursuant to Local Rule 79-
2 5.2.2, plaintiffs Paramount Pictures Corporation and CBS Studios Inc. (collectively,
3 “Plaintiffs”) will and hereby do apply for an order filing under seal the following
4 document:

5 Unredacted Memorandum of Contentions of Fact and Law, which references
6 material that Defendants have designated as “Confidential” pursuant to the
7 terms of the Stipulated Protective Order entered by this Court on July 12,
8 2016. *See* Dkt. 53.

9
10 Plaintiffs seek leave to file under seal the foregoing on the grounds that
11 Plaintiffs or defendants Axanar Production, Inc. and Alec Peters designated the
12 foregoing “Confidential” pursuant to the terms of the Stipulated Protective Order
13 entered by this Court on July 12, 2016. See Dkt. 53.

14
15 Dated: December 19, 2016

LOEB & LOEB LLP
JONATHAN ZAVIN
DAVID GROSSMAN
JENNIFER JASON

16
17
18 By: /s/ Jennifer Jason
19 Jennifer Jason
20 Attorneys for Plaintiffs
21 PARAMOUNT PICTURES
22 CORPORATION and CBS STUDIOS
23 INC.

24
25
26
27
28