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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,
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19 Plaintiffs,

20 v.

21 AXANAR PRODUCTIONS, INC., a
California corporation; ALEC PETERS,
an individual, and DOES 1-20,
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23 Defendants.
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Case No.: 2:15-cv-09938-RGK-E

**PLAINTIFFS' NARRATIVE
STATEMENT OF
QUALIFICATIONS OF EXPERT
AND EXPECTED TRIAL
TESTIMONY**

Trial: January 31, 2017

1 **I. John Van Citters**

2 **A. Mr. Van Citters' Qualifications.**

3 John Van Citters is the Vice President of Product Development at CBS
4 Consumer Products. He has been employed at Plaintiff CBS Studios Inc. ("CBS")
5 since 2006. Prior to that, he was employed by Plaintiff Paramount Pictures
6 Corporation ("Paramount") since 1998. He has been working with Star Trek since
7 November of 1998. Mr. Van Citters looks at virtually every piece of Star Trek
8 merchandise and artwork involved in CBS' licensing program to determine that it is
9 accurate and correct and is not damaging to Star Trek. It is crucial to Mr. Van
10 Citters' role that he knows the canon of Star Trek intimately as well as the history
11 and personnel involved in the production of Star Trek in order to be able to
12 efficiently assess whether or not material CBS is presenting to the public is accurate
13 and fits with existing canon. It is vital to do that with accuracy and detail in order to
14 properly and consistently maintain how Star Trek appears to fandom and the world
15 at large. Additionally, Mr. Van Citters consults with others within CBS including
16 its mobile, legal, home entertainment, PR and marketing divisions on questions of
17 Star Trek canon, history and accuracy.

18 In connection with his roles at both CBS and Paramount, he has become
19 intimately familiar with all of the films, televisions shows, books, reference guides
20 and licensed products relating to Plaintiffs' Star Trek property. He has seen every
21 Star Trek film, television episode, and has read the Star Trek books. He is familiar
22 with innumerable licensed Star Trek merchandise. He recently helped consult in the
23 creation of an authorized Star Trek encyclopedia. He reviews all of the content of
24 all Star Trek works as part of his role as Vice President of Product Development for
25 CBS.

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1 **B. The Testimony Expected to be Elicited at Trial from Mr. Van**
2 **Citters.**

3 Mr. Van Citters, as a result of his extensive experience working with the Star
4 Trek universe, and his knowledge of the various characters, designs, stories and
5 elements owned by Plaintiffs, was designated pursuant to Fed. R. Civ. P.
6 26(a)(2)(B) (1) as an employee of Plaintiff CBS that possesses knowledge beyond
7 that of a lay witness. Mr. Van Citters will describe and discuss Plaintiffs’ Star Trek
8 Copyrighted Works and the elements of those works that are included in
9 Defendants’ Axanar Works. Mr. Van Citters will testify regarding the specific
10 characters and works that were copied by Defendants’ Axanar Works, including
11 Klingons, Vulcans, the U.S.S. Enterprise, Garth of Izar, Soval the Vulcan
12 Ambassador, the planet Vulcan, and many additional elements from the Star Trek
13 universe, including the settings, characters, plots, sequences and themes described in
14 the First Amended Complaint in this action that were copied by Defendants to create
15 their infringing works.

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17 Dated: January 4, 2017

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