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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 SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION *IN LIMINE*
NO. 1**

20 **REDACTED VERSION OF DOCUMENT**

21 **SOUGHT TO BE FILED UNDER SEAL**

DECLARATION OF ERIN R. RANAHAH

I, Erin R. Ranahan, declare as follows:

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

2. Throughout the course of this litigation, Defendants have maintained that donor expenditures by Defendants—of the funds raised by Defendants before the works at issue in this case were created—were not relevant to a trial on claims of copyright infringement. In Defendants’ responses to Plaintiffs’ discovery requests, Defendants objected to producing such information. *See* Defendants’ Responses to Plaintiffs’ Request for Production of Documents, Nos. 11, 12, 38, 39, 40, 53, 54, 55. A true and correct copy of Defendants’ Responses to Plaintiffs’ Requests for Production of Documents is attached hereto as Exhibit A.

3. Plaintiffs did not move to compel documents relevant to any of those requests.

4. [REDACTED]

5. [REDACTED]

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[REDACTED]

6. [REDACTED]

[REDACTED]

7. [REDACTED]

[REDACTED]

8. [REDACTED]

[REDACTED]

9. [REDACTED]

[REDACTED]

I declare under the penalty of perjury that the foregoing is true and correct.
Dated this 6th day of January, 2017 in Los Angeles, California.

/s/ Erin R. Ranahan
Erin R. Ranahan