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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*

**OMNIBUS DECLARATION OF  
AMY M. STERN IN SUPPORT OF  
DEFENDANTS AXANAR  
PRODUCTIONS INC. AND ALEC  
PETERS' OPPOSITION TO  
PLAINTIFFS' MOTIONS *IN LIMINE*  
NOS. 3, 5, AND 7**

Hearing Date: January 31, 2017  
Pretrial Conference: January 9, 2017  
Trial Date: January 31, 2017

**DECLARATION OF AMY M. STERN**

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

6 2. Defendants designated Mr. Lane as a fact witness to testify at trial about  
7 his personal knowledge regarding Star Trek fan fiction and his work with Defendant  
8 Axanar Productions, Inc. in Defendants’ Amended Initial Disclosures, dated  
9 September 27, 2016.

10 3. On September 7, 2016, Defendants produced to Plaintiffs “A History of  
11 Star Trek Fan Films,” an executive summary of the history of Star Trek fan fiction,  
12 written by Jonathan Lane, Bates Number AX000213.

13 4. **Exhibit 1** to my declaration is a true and correct copy of excerpted pages  
14 from the transcript of the deposition of Bill Hunt, taken on October 25, 2016.

15 5. **Exhibit 2** to my declaration is a true and correct copy of Exhibit 84 to the  
16 Deposition of Elizabeth D. Kalodner, taken on October 13, 2016.

17 6. **Exhibit 3** to my declaration is a true and correct copy of Exhibit 83 to the  
18 Deposition of Elizabeth D. Kalodner, taken on October 13, 2016.

19 7. **Exhibit 4** to my declaration is a true and correct copy of Exhibit 3 to the  
20 Deposition of John Van Citters, taken on September 28, 2016.

21  
22 I declare under the penalty of perjury that the foregoing is true and correct.  
23 Dated this 6th day of January, 2017 at Los Angeles, California.

24  
25 /s/ Amy M. Stern

26 Amy M. Stern