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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,

18 Plaintiffs,

19 v.

20 AXANAR PRODUCTIONS, INC., a
21 California corporation; ALEC PETERS,
an individual, and DOES 1-20,

22 Defendants.
23

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

**PLAINTIFFS' UNOPPOSED
APPLICATION FOR LEAVE TO
FILE DOCUMENTS UNDER
SEAL RE: OPPOSITIONS TO
MOTIONS IN LIMINE**

Pre-Trial Conference: January 9, 2017
Trial: January 31, 2017

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 documents in support of Plaintiffs’ Oppositions to Defendants’ Motions in Limine:

- 5 1. Unredacted Opposition to Motion in Limine (“MIL”) No. 1.
- 6 2. Unredacted Declaration of David Grossman in Support of MIL
7 No. 1.
- 8 3. **Exhibit A** to Declaration in Support of Opposition to MIL No. 1
9 (excerpts from the deposition transcripts of Alec Peters).
- 10 4. Unredacted Opposition to MIL No. 2.
- 11 5. Unredacted Declaration of David Grossman in Support of
12 Opposition to MIL No. 2.
- 13 6. **Exhibit A** to Declaration of David Grossman in Support of
14 Opposition to MIL No. 2 (excerpts from the deposition transcript of Alec Peters).
- 15 7. **Exhibit A** to Declaration of Jonathan Zavin in Support of
16 Opposition to MIL No. 2 (excerpts from the deposition transcript of John Van
17 Citters).
- 18 8. Unredacted Opposition to MIL No. 3.
- 19 9. Unredacted Declaration of David Grossman in Support of
20 Opposition to MIL No. 3.
- 21 10. **Exhibit A** to Declaration of David Grossman in Support of
22 Opposition to MIL No. 3 (excerpts from the deposition transcript of Alec Peters).
- 23 11. Unredacted Opposition to MIL No. 4.
- 24 12. Unredacted Declaration of David Grossman in Support of
25 Opposition to MIL No. 4.
- 26 13. **Exhibit A** to Declaration of David Grossman in Support of
27 Opposition to MIL No. 4 (Axanar Script Version 7.7).

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1 14. **Exhibit B** to Declaration of David Grossman in Support of
2 Opposition to MIL No. 4 (excerpts from the deposition transcript of Alec Peters).

3 15. **Exhibit C** to the Declaration of David Grossman in Support of
4 Opposition to MIL No. 4 (electronic press kit).

5 16. **Exhibit D** to the Declaration of David Grossman in Support of
6 Opposition to MIL No. 4 (phaser concepts).

7 17. Unredacted Opposition to MIL No. 5.

8 18. Unredacted Opposition to MIL No. 6.

9 19. Unredacted Declaration of David Grossman in Support of
10 Opposition to MIL No. 6.

11 20. **Exhibit A** to Declaration of David Grossman in Support of
12 Opposition to MIL No. 6 (excerpts from the deposition transcript of Alec Peters).

13 21. Unredacted Opposition to MIL No. 7.

14 22. **Exhibit B** to Declaration of David Grossman in Support of
15 Opposition to MIL No. 8 (excerpts from the deposition transcript of Alec Peters).

16 23. Unredacted Opposition to MIL No. 9.

17 24. Unredacted Declaration of David Grossman in Support of
18 Opposition to MIL No. 9.

19 25. **Exhibit A** to Declaration of David Grossman in Support of
20 Opposition to MIL No. 9 (excerpts from the deposition transcript of Alec Peters).

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

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Dated: January 6, 2017

LOEB & LOEB LLP
JONATHAN ZAVIN
DAVID GROSSMAN
JENNIFER JASON

By: /s/ Jennifer Jason
Jennifer Jason
Attorneys for Plaintiffs
PARAMOUNT PICTURES
CORPORATION and CBS STUDIOS
INC.