

## **EXHIBIT B**

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8  
9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 PARAMOUNT PICTURES  
12 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.  
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Case No. 2:15-cv-09938-RGK-E

*Assigned to: Hon. R. Gary Klausner*

**ROBERT MEYER BURNETT'S  
RESPONSES AND OBJECTIONS TO  
DEPOSITION SUBPOENA AND  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS**

Original Complaint Filed: 12/29/15  
First Amended Complaint Filed: 3/11/16

1 Pursuant to Rule 45 of the Federal Rules of Civil Procedure, Robert Meyer  
2 Burnett, by and through his undersigned counsel, hereby responds and objects to  
3 Plaintiffs Paramount Pictures Corporation and CBS Studio Inc.'s (collectively  
4 "Plaintiffs") Deposition Subpoena to Robert Meyer Burnett and Request for  
5 Production of Documents ("Requests") as follows:

6 **RESERVATION OF RIGHTS**

7 1. Mr. Burnett provides these responses and objections without waiving or  
8 intending to waive, and, on the contrary, preserving and intending to preserve:

9 a. the right to object on any ground to the use of the responses and  
10 objections herein, or the subject matter thereof, in any subsequent proceeding in  
11 this or any other action;

12 b. the right to object on any ground at any time to a request for  
13 further responses to the Requests, or any other discovery request involving or  
14 related to the subject matter of the Requests responded to herein;

15 c. the right at any time to supplement, amend, correct, add to, or  
16 clarify any of the responses and objections provided herein.

17 2. In responding and objecting to the Requests, Mr. Burnett does not admit,  
18 concede, or acquiesce in the accuracy of any definitions of terms or descriptions of  
19 any facts, events, pleadings, or documents contained therein. Mr. Burnett specifically  
20 does not waive his objections to any definition as vague or overbroad, and reserves the  
21 right to define terms differently or more specifically from the way in which they are  
22 defined in the Requests.

23 3. In each and every instance in which Mr. Burnett interposes an objection,  
24 such objection shall be construed to preserve all of his rights to make similar  
25 objections in any future supplemental response to the Requests. Moreover, a failure to  
26 object herein shall not constitute a waiver of any objections that Mr. Burnett may  
27 interpose in future supplemental responses.

28 4. Any agreement by Mr. Burnett herein to produce any documents or

1 categories of documents does not necessarily mean that any documents or categories  
2 of documents that are responsive to the Requests exist or are in Mr. Burnett's  
3 possession, custody, or control. To the contrary, any such agreement is subject to the  
4 existence of such documents.

5         5. Inadvertent production or disclosure of information or documents  
6 otherwise protected from discovery under the attorney-client privilege, the work  
7 product doctrine, or any other applicable privilege, immunity, or protection from  
8 disclosure, shall not constitute a waiver of such privilege, immunity, or protection,  
9 either generally or specifically, with respect to such document or information or any  
10 other document or information, or with respect to the subject matter thereof, and Mr.  
11 Burnett reserves the right to request the return of any such documents or information  
12 and all copies thereof.

13         6. Inadvertent production or disclosure of information or documents  
14 otherwise protected from discovery under any applicable privilege, immunity, or  
15 protection from disclosure, shall not waive Mr. Burnett's right to object to the use of  
16 any such documents or information at any time during this action or in any subsequent  
17 proceeding.

18         7. The fact that Mr. Burnett is willing to produce any particular documents  
19 or group of documents does not constitute an admission or acknowledgement that the  
20 related request is proper, that such documents or groups of documents are relevant,  
21 admissible, or within the proper bounds of discovery, or that requests for similar  
22 documents will be treated in a similar fashion.

23         8. Mr. Burnett reserves the right to produce documents on a rolling basis,  
24 and to produce documents on a reasonable schedule.

25         9. These responses and objections are based upon Mr. Burnett's knowledge  
26 and information as of the date hereof, and are made subject to the general and specific  
27 objections below. Mr. Burnett reserves the right to supplement any responses as  
28 further information is discovered.

**GENERAL OBJECTIONS**

Mr. Burnett's specific objections set forth below are in addition to the general objections set forth in this section. These General Objections form a part of the responses to the Requests and each and every request contained therein. Thus, the absence of a reference to a General Objection should not be construed as a waiver of the General Objection as to a specific request.

1. Mr. Burnett objects to the Requests to the extent they seek to impose obligations or burdens greater than those required by the Federal Rules of Civil Procedure, the Local Rules of this Court, and any other applicable rules or laws.

2. Mr. Burnett objects to the Requests to the extent that they purport to impose any requirement or discovery obligation on him that is inconsistent with or greater than those contained in the Federal Rules of Civil Procedure, the Local Rules of this Court, or other applicable law.

3. Mr. Burnett objects to the requests to the extent that they seek information, documents, or communications not within Mr. Burnett's possession, custody, or control.

4. Mr. Burnett objects to the Requests to the extent that they call for disclosure of information or documents protected by the attorney-client privilege, work product doctrine, or any other applicable privilege, immunity, or protection from disclosure, for any reason, including without limitation the terms of any confidentiality agreement or court order.

5. Mr. Burnett objects to the Requests to the extent that they seek highly confidential, trade secret, proprietary, or commercially sensitive information, the disclosure of which could result in substantial competitive injury.

6. Mr. Burnett objects to the Requests to the extent they seek the production of "all" information, documents, or communications of a described type, or similar requests, on the grounds that, as written, they would impose upon Mr. Burnett an unreasonable burden of inquiry. In responding to the Requests, Mr. Burnett will

1 conduct a reasonable search limited to the most likely repositories of responsive  
2 documents, consistent with and subject to the Reservation of Rights, the General  
3 Objections, and the specific objections below.

4       7. Mr. Burnett objects to the Requests insofar as they use the terms  
5 “support,” “negate,” “reflect,” “mention,” “refer to,” “bear upon,” or “relate to,” on  
6 the grounds that these terms are indefinite and uncertain and fail to describe or to  
7 designate the documents sought with reasonable particularity. Mr. Burnett will apply  
8 a common sense test in interpreting the reasonable scope of any request employing  
9 any of these terms.

10       8. Mr. Burnett objects to the Requests insofar as they use the term “Axanar  
11 Motion Picture” on the grounds that this term is indefinite and uncertain and refers to  
12 a work that has not yet been created.

13       9. Mr. Burnett objects to the Requests insofar as they use the term “Axanar  
14 Works” on the grounds that this term is indefinite and uncertain and compound in that  
15 it refers to multiple works, some of which have not yet been created.

16       10. Mr. Burnett objects to the Requests to the extent they seek information  
17 that is neither relevant to any claim or defense asserted in this action, nor reasonably  
18 calculated to lead to the discovery of admissible evidence.

19       11. Mr. Burnett objects to the Requests to the extent they contemplate the  
20 production of duplicate copies of a document whose recipients are evident from the  
21 face of the document.

22       12. Mr. Burnett objects to the Requests to the extent they are vague,  
23 ambiguous, overly broad, or do not identify the documents or information sought with  
24 reasonable particularity.

25       13. Mr. Burnett objects to the Requests to the extent they seek to require Mr.  
26 Burnett to produce documents constituting, containing, or reflecting information  
27 obtained by Mr. Burnett from third parties pursuant to any agreement or undertaking  
28 prohibiting Mr. Burnett from disclosing such information. To the extent that any such

1 issue arises, Mr. Burnett will notify the parties and exercise good faith efforts to  
2 obtain a reasonable resolution.

3 14. Mr. Burnett objects to the Requests to the extent they purport to require  
4 the disclosure of information that Mr. Burnett is restricted by law from disclosing.

5 **RESPONSES TO REQUESTS FOR PRODUCTION**

6 **REQUEST FOR PRODUCTION NO. 1:**

7 All scripts and all versions of any script (whether complete or incomplete, and  
8 whether used or not used) used for or at any time intended for use in any of the  
9 AXANAR WORKS.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

11 In addition to his General Objections, Mr. Burnett objects to this Request on the  
12 grounds that it imposes undue burden and expense on a non-party when the discovery  
13 sought could have been readily produced by a party to the litigation. See Fed. R. Civ.  
14 P. 26(b)(2)(C)(ii) (“[T]he court must limit the frequency or extent of discovery  
15 otherwise allowed by these rules or by local rule if it determines . . . the party seeking  
16 discovery has had ample opportunity to obtain the information by discovery in this  
17 action . . . .”). Mr. Burnett further objects to this Request on the grounds that it is  
18 vague and ambiguous as to the phrase “all versions,” and is overly broad. Mr. Burnett  
19 further objects to this Request on the grounds that it is duplicative and burdensome to  
20 the extent it calls for documents already produced to Plaintiffs after a reasonably  
21 diligent search. Mr. Burnett further objects to this Request on the grounds that the  
22 term “AXANAR WORKS” is vague, compound, and refers to multiple works, some  
23 of which have not yet been created.

24 **REQUEST FOR PRODUCTION NO. 2:**

25 All treatments, storyboards, synopses, drafts, notes, pitch memos, screenplays,  
26 outlines, and/or revisions RELATING TO the AXANAR WORKS.

27 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

28 In addition to his General Objections, Mr. Burnett objects to this Request on the



1 grounds that it imposes undue burden and expense on a non-party when the discovery  
2 sought could have been readily produced by a party to the litigation. Mr. Burnett  
3 further objects to this Request on the grounds that it is vague and ambiguous as to the  
4 words “treatments,” “storyboards,” “synopses,” “drafts,” “notes,” “pitch memos,”  
5 “screenplays,” “outlines,” and “revisions,” and overly broad. Mr. Burnett further  
6 objects to this Request on the grounds that it is duplicative and burdensome to the  
7 extent it calls for documents already produced to Plaintiffs after a reasonably diligent  
8 search. Mr. Burnett further objects to this Request on the grounds that the term  
9 “AXANAR WORKS” is vague, compound, and refers to multiple works, some of  
10 which have not yet been created.

11 **REQUEST FOR PRODUCTION NO. 3:**

12 All DOCUMENTS RELATING TO the development of the AXANAR  
13 WORKS.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

15 In addition to his General Objections, Mr. Burnett objects to this Request on the  
16 grounds that it is vague and ambiguous as to the word “development,” and overly  
17 broad. Mr. Burnett further objects to this Request on the grounds that it is duplicative  
18 and burdensome to the extent it calls for documents already produced to Plaintiffs  
19 after a reasonably diligent search. Mr. Burnett further objects to this Request on the  
20 grounds that the term “AXANAR WORKS” is vague, compound, and refers to  
21 multiple works, some of which have not yet been created.

22 **REQUEST FOR PRODUCTION NO. 4:**

23 All production notes RELATING TO the AXANAR WORKS.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

25 In addition to his General Objections, Mr. Burnett objects to this Request on the  
26 grounds that it is vague and ambiguous as to the phrase “production notes,” and overly  
27 broad. Mr. Burnett further objects to this Request on the grounds that it is duplicative  
28 and burdensome to the extent it calls for documents already produced to Plaintiffs



1 after a reasonably diligent search. Mr. Burnett further objects to this Request on the  
2 grounds that the term “AXANAR WORKS” is vague, compound, and refers to  
3 multiple works, some of which have not yet been created.

4 **REQUEST FOR PRODUCTION NO. 5:**

5 All DOCUMENTS RELATING TO the sets for the AXANAR WORKS.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

7 In addition to his General Objections, Mr. Burnett objects to this Request on the  
8 grounds that it is vague and ambiguous, and overly broad. Mr. Burnett further objects  
9 to this Request on the grounds that it is duplicative and burdensome to the extent it  
10 calls for documents already produced to Plaintiffs after a reasonably diligent search.  
11 Mr. Burnett further objects to this Request on the grounds that the term “AXANAR  
12 WORKS” is vague, compound, and refers to multiple works, some of which have not  
13 yet been created.

14 **REQUEST FOR PRODUCTION NO. 6:**

15 All DOCUMENTS RELATING TO the designs for the AXANAR WORKS,  
16 including but not limited to computer designs (“CGI”).

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

18 In addition to his General Objections, Mr. Burnett objects to this Request on the  
19 grounds that it is vague and ambiguous as to the word “designs,” and overly broad.  
20 Mr. Burnett further objects to this Request on the grounds that it is duplicative and  
21 burdensome to the extent it calls for documents already produced to Plaintiffs after a  
22 reasonably diligent search. Mr. Burnett further objects to this Request on the grounds  
23 that the term “AXANAR WORKS” is vague, compound, and refers to multiple works,  
24 some of which have not yet been created.

25 **REQUEST FOR PRODUCTION NO. 7:**

26 All DOCUMENTS RELATING to the purchase, design, construction or use of  
27 props for the AXANAR WORKS.

28 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

1 In addition to his General Objections, Mr. Burnett objects to this Request on the  
2 grounds that it is overly broad, duplicative and burdensome to the extent it calls for  
3 documents already produced to Plaintiffs after a reasonably diligent search. Mr.  
4 Burnett further objects to this Request on the grounds that the term "AXANAR  
5 WORKS" is vague, compound, and refers to multiple works, some of which have not  
6 yet been created.

7 **REQUEST FOR PRODUCTION NO. 8**

8 All agreements with third parties for services in connection with the production  
9 of the AXANAR WORKS, including but not limited to all DOCUMENTS reflecting  
10 payments to third parties with respect to such services.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

12 In addition to his General Objections, Mr. Burnett objects to this Request on the  
13 grounds that it is overly broad, duplicative and burdensome to the extent it calls for  
14 documents already produced to Plaintiffs after a reasonably diligent search. Mr.  
15 Burnett further objects to this Request on the grounds that the term "AXANAR  
16 WORKS" is vague, compound, and refers to multiple works, some of which have not  
17 yet been created.

18 **REQUEST FOR PRODUCTION NO. 9:**

19 All DOCUMENTS (whether internal or from any third party) reflecting any  
20 opinion as to whether the AXANAR WORKS infringed the rights of PLAINTIFFS, or  
21 whether the permission of PLAINTIFFS was required.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

23 In addition to his General Objections, Mr. Burnett objects to this Request on the  
24 grounds that it is overly broad, and calls for a legal conclusion. Mr. Burnett further  
25 objects to this Request on the grounds that it seeks information protected by the  
26 attorney-client privilege and work product doctrine. Mr. Burnett further objects to this  
27 Request on the grounds that the term "AXANAR WORKS" is vague, compound, and  
28 refers to multiple works, some of which have not yet been created.

1 **REQUEST FOR PRODUCTION NO. 10:**

2 All DOCUMENTS RELATING TO the costumes for the AXANAR WORKS.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

4 In addition to his General Objections, Mr. Burnett objects to this Request on the  
5 grounds that it is duplicative and burdensome to the extent it calls for documents  
6 already produced to Plaintiffs after a reasonably diligent search. Mr. Burnett further  
7 objects to this Request on the grounds that the term “AXANAR WORKS” is vague,  
8 compound, and refers to multiple works, some of which have not yet been created.

9 **REQUEST FOR PRODUCTION NO. 11:**

10 All DOCUMENTS RELATING TO Ares Studio, including but not limited to  
11 all DOCUMENTS regarding the leasing and or purchase of the Studio, the ownership  
12 of the Studio, the construction of the Studio (including all financial documents), and  
13 the use of the Studio.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

15 In addition to their General Objections, Mr. Burnett objects to this Request on  
16 the grounds that it imposes undue burden and expense on a non-party when the  
17 discovery sought could have been readily produced by a party to the litigation. Mr.  
18 Burnett further objects to this Request on the grounds that it is vague and ambiguous,  
19 overly broad, and to the extent it seeks documents that are neither relevant to any  
20 party’s claims or defenses, nor proportional to the needs of the case. Mr. Burnett  
21 further objects to this Request on the grounds that it is duplicative and burdensome to  
22 the extent it calls for documents already produced to Plaintiffs after a reasonably  
23 diligent search.

24 **REQUEST FOR PRODUCTION NO. 12:**

25 All DOCUMENTS RELATING TO any future plans for Ares Studio, including  
26 but not limited to agreements, business plans, incorporation documents, and tax  
27 documents.

28 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

1 In addition to his General Objections, Mr. Burnett objects to this Request on the  
2 grounds that it imposes undue burden and expense on a non-party when the discovery  
3 sought could have been readily produced by a party to the litigation. Mr. Burnett  
4 further objects to this Request on the grounds that it is vague and ambiguous as to the  
5 phrase “future plans,” overly broad, and to the extent it seeks documents that are  
6 neither relevant to any party’s claims or defenses, nor proportional to the needs of the  
7 case. Mr. Burnett further objects to this Request on the grounds that it is duplicative  
8 and burdensome to the extent it calls for documents already produced to Plaintiffs  
9 after a reasonably diligent search.

10 **REQUEST FOR PRODUCTION NO. 13:**

11 All DOCUMENTS setting forth any schedules associated with the making of  
12 the AXANAR WORKS, including writing and other pre-production schedules,  
13 production schedules and editing and other post-production schedules.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

15 In addition to his General Objections, Mr. Burnett object to this Request on the  
16 grounds that it is vague and ambiguous as to the word “schedules,” overly broad, and  
17 to the extent it seeks documents that are neither relevant to any party’s claims or  
18 defenses, nor proportional to the needs of the case. Mr. Burnett further objects to this  
19 Request on the grounds that it is duplicative and burdensome to the extent it calls for  
20 documents already produced to Plaintiffs after a reasonably diligent search. Mr.  
21 Burnett further objects to this Request on the grounds that the term “AXANAR  
22 WORKS” is vague, compound, and refers to multiple works, some of which have not  
23 yet been created.

24 **REQUEST FOR PRODUCTION NO. 14:**

25 All DOCUMENTS RELATING TO the characters portrayed in the AXANAR  
26 WORKS, including, without limitation, production notes, casting sheets, casting  
27 notes, outlines, storyboards and character biographies.

28 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

1 In addition to his General Objections, Mr. Burnett objects to this Request on the  
2 grounds that it imposes undue burden and expense on a non-party when the discovery  
3 sought could have been readily produced by a party to the litigation. Mr. Burnett  
4 further objects to this Request on the grounds that it is vague and ambiguous, and  
5 overly broad. Mr. Burnett further objects to this Request on the grounds that it is  
6 duplicative and burdensome to the extent it calls for documents already produced to  
7 Plaintiffs after a reasonably diligent search. Mr. Burnett further objects to this  
8 Request on the grounds that the term “AXANAR WORKS” is vague, compound, and  
9 refers to multiple works, some of which have not yet been created.

10 **REQUEST FOR PRODUCTION NO. 15:**

11 Copies of all partial and complete versions of the AXANAR WORKS,  
12 including without limitation those film cuts and sequences which were filmed but  
13 have not yet been distributed.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

15 In addition to his General Objections, Mr. Burnett objects to this Request on the  
16 grounds that it is overly broad, and to the extent it seeks documents that are neither  
17 relevant to any party’s claims or defenses, nor proportional to the needs of the case.  
18 Mr. Burnett further objects to this Request on the grounds that it is duplicative and  
19 burdensome to the extent it calls for documents already produced to Plaintiffs after a  
20 reasonably diligent search. Mr. Burnett further objects to this Request on the grounds  
21 that the term “AXANAR WORKS” is vague, compound, and refers to multiple works,  
22 some of which have not yet been created.

23 **REQUEST FOR PRODUCTION NO. 16:**

24 All COMMUNICATIONS with third parties RELATING TO the AXANAR  
25 WORKS.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

27 In addition to his General Objections, Mr. Burnett objects to this Request on the  
28 grounds that it is vague and ambiguous, overly broad, and to the extent it seeks

1 documents that are neither relevant to any party's claims or defenses, nor proportional  
2 to the needs of the case. Mr. Burnett further objects to this Request on the grounds  
3 that it is duplicative and burdensome to the extent it calls for documents already  
4 produced to Plaintiffs after a reasonably diligent search. Mr. Burnett further objects to  
5 this Request on the grounds that the term "AXANAR WORKS" is vague, compound,  
6 and refers to multiple works, some of which have not yet been created.

7 **REQUEST FOR PRODUCTION NO. 17:**

8 All COMMUNICATIONS, both public and private, RELATING TO the  
9 AXANAR WORKS.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

11 In addition to his General Objections, Mr. Burnett objects to this Request on the  
12 grounds that it does not specify the documents sought with reasonable particularity as  
13 required by Federal Rule of Civil Procedure 45. Because the Request seeks "all  
14 communications, both public and private, relating to the Axanar Works," Mr. Burnett  
15 further objects to this Request on the grounds that it is overly broad, unduly  
16 burdensome, and to the extent it seeks documents that are neither relevant to any  
17 party's claims or defenses, nor proportional to the needs of the case. Mr. Burnett  
18 further objects to this Request to the extent it imposes obligations to produce publicly  
19 available information, or to produce information that is equally or more easily  
20 available to Plaintiffs than it is to the non-party. Mr. Burnett further objects to this  
21 Request on the grounds that it is duplicative and burdensome to the extent it calls for  
22 documents already produced to Plaintiffs after a reasonably diligent search. Mr.  
23 Burnett further objects to this Request to the extent it seeks documents protected by  
24 the attorney-client privilege and/or work product doctrine. Mr. Burnett further objects  
25 to this Request on the grounds that the term "AXANAR WORKS" is vague,  
26 compound, and refers to multiple works, some of which have not yet been created.

27 **REQUEST FOR PRODUCTION NO. 18:**

28 All COMMUNICATIONS with actors RELATING TO the AXANAR



1 WORKS, including but not limited to all agreements with actors.

2 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

3 In addition to his General Objections, Mr. Burnett objects to this Request on the  
4 grounds that it is overly broad, and to the extent it seeks documents that are neither  
5 relevant to any party's claims or defenses, nor proportional to the needs of the case.  
6 Mr. Burnett further objects to this Request on the grounds that it is duplicative and  
7 burdensome to the extent it calls for documents already produced to Plaintiffs after a  
8 reasonably diligent search. Mr. Burnett further objects to this Request on the grounds  
9 that the term "AXANAR WORKS" is vague, compound, and refers to multiple works,  
10 some of which have not yet been created.

11 **REQUEST FOR PRODUCTION NO. 19:**

12 All COMMUNICATIONS with investors or donors, or anyone else giving  
13 money RELATING TO the AXANAR WORKS.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

15 In addition to his General Objections, Mr. Burnett objects to this Request on the  
16 grounds that it is overly broad, and to the extent it seeks documents that are neither  
17 relevant to any party's claims or defenses, nor proportional to the needs of the case.  
18 Mr. Burnett further objects to this Request on the grounds that it is duplicative and  
19 burdensome to the extent it calls for documents already produced to Plaintiffs after a  
20 reasonably diligent search. Mr. Burnett further objects to this Request on the grounds  
21 that the term "AXANAR WORKS" is vague, compound, and refers to multiple works,  
22 some of which have not yet been created.

23 **REQUEST FOR PRODUCTION NO. 20:**

24 All COMMUNICATIONS with Axanar Productions, Inc. RELATING TO the  
25 AXANAR WORKS.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

27 In addition to his General Objections, Mr. Burnett objects to this Request on the  
28 grounds that it imposes undue burden and expense on a non-party when the discovery



1 sought could have been readily produced by a party to the litigation. Mr. Burnett  
2 further objects to this Request on the grounds that it is vague and ambiguous, overly  
3 broad, and to the extent it seeks documents that are neither relevant to any party's  
4 claims or defenses, nor proportional to the needs of the case. Mr. Burnett further  
5 objects to this Request on the grounds that it is duplicative and burdensome to the  
6 extent it calls for documents already produced to Plaintiffs after a reasonably diligent  
7 search. Mr. Burnett further objects to this Request on the grounds that the term  
8 "AXANAR WORKS" is vague, compound, and refers to multiple works, some of  
9 which have not yet been created.

10 **REQUEST FOR PRODUCTION NO. 21:**

11 All COMMUNICATIONS with Alec Peters RELATING TO the AXANAR  
12 WORKS.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

14 In addition to his General Objections, Mr. Burnett objects to this Request on the  
15 grounds that it imposes undue burden and expense on a non-party when the discovery  
16 sought could have been readily produced by parties to the litigation. Mr. Burnett  
17 further objects to this Request on the grounds that it is vague and ambiguous, overly  
18 broad, and to the extent it seeks documents that are neither relevant to any party's  
19 claims or defenses, nor proportional to the needs of the case. Mr. Burnett further  
20 objects to this Request on the grounds that it is duplicative and burdensome to the  
21 extent it calls for documents already produced to Plaintiffs after a reasonably diligent  
22 search. Mr. Burnett further objects to this Request on the grounds that the term  
23 "AXANAR WORKS" is vague, compound, and refers to multiple works, some of  
24 which have not yet been created.

25 **REQUEST FOR PRODUCTION NO. 22:**

26 All COMMUNICATIONS with Diana Kingsbury RELATING TO the  
27 AXANAR WORKS.

28 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

1 In addition to his General Objections, Mr. Burnett objects to this Request on the  
2 grounds that it is duplicative and burdensome to the extent it calls for documents  
3 already produced to Plaintiffs after a reasonably diligent search. Mr. Burnett further  
4 objects to this Request on the grounds that the term "AXANAR WORKS" is vague,  
5 compound, and refers to multiple works, some of which have not yet been created.

6 **REQUEST FOR PRODUCTION NO. 23:**

7 All COMMUNICATIONS with Terry McIntosh RELATING TO the  
8 AXANAR WORKS.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

10 In addition to his General Objections, Mr. Burnett objects to this Request on the  
11 grounds that it is overly broad, unduly burdensome, and to the extent it seeks  
12 documents that are neither relevant to any party's claims or defenses, nor proportional  
13 to the needs of the case. Mr. Burnett further objects to this Request on the grounds  
14 that the term "AXANAR WORKS" is vague, compound, and refers to multiple works,  
15 some of which have not yet been created.

16 **REQUEST FOR PRODUCTION NO. 24:**

17 All COMMUNICATIONS with Alexander Bornstein RELATING TO the  
18 AXANAR WORKS.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

20 In addition to his General Objections, Mr. Burnett objects to this Request on the  
21 grounds that it is overly broad, unduly burdensome, and to the extent it seeks  
22 documents that are neither relevant to any party's claims or defenses, nor proportional  
23 to the needs of the case. Mr. Burnett further objects to this Request on the grounds  
24 that the term "AXANAR WORKS" is vague, compound, and refers to multiple works,  
25 some of which have not yet been created.

26 **REQUEST FOR PRODUCTION NO. 25:**

27 All COMMUNICATIONS with Bing Bailey RELATING TO the AXANAR  
28 WORKS.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

In addition to his General Objections, Mr. Burnett objects to this Request on the grounds that it is overly broad, unduly burdensome, and to the extent it seeks documents that are neither relevant to any party's claims or defenses, nor proportional to the needs of the case. Mr. Burnett further objects to this Request on the grounds that the term "AXANAR WORKS" is vague, compound, and refers to multiple works, some of which have not yet been created.

**REQUEST FOR PRODUCTION NO. 26:**

All COMMUNICATIONS with Bill Hunt RELATING TO the AXANAR WORKS.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

In addition to his General Objections, Mr. Burnett objects to this Request on the grounds that it is overly broad, unduly burdensome, and to the extent it seeks documents that are neither relevant to any party's claims or defenses, nor proportional to the needs of the case. Mr. Burnett further objects to this Request on the grounds that the term "AXANAR WORKS" is vague, compound, and refers to multiple works, some of which have not yet been created.

**REQUEST FOR PRODUCTION NO. 27:**

All COMMUNICATIONS with Michael Spatola RELATING TO the AXANAR WORKS.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

In addition to his General Objections, Mr. Burnett objects to this Request on the grounds that it is overly broad, unduly burdensome, and to the extent it seeks documents that are neither relevant to any party's claims or defenses, nor proportional to the needs of the case. Mr. Burnett further objects to this Request on the grounds that the term "AXANAR WORKS" is vague, compound, and refers to multiple works, some of which have not yet been created.

**REQUEST FOR PRODUCTION NO. 28:**

1 All COMMUNICATIONS with Frank Serafine RELATING TO the AXANAR  
2 WORKS.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

4 In addition to his General Objections, Mr. Burnett objects to this Request on the  
5 grounds that it is overly broad, unduly burdensome, and to the extent it seeks  
6 documents that are neither relevant to any party's claims or defenses, nor proportional  
7 to the needs of the case. Mr. Burnett further objects to this Request on the grounds  
8 that the term "AXANAR WORKS" is vague, compound, and refers to multiple works,  
9 some of which have not yet been created.

10 **REQUEST FOR PRODUCTION NO. 29:**

11 All COMMUNICATIONS with Adam Howard RELATING TO the AXANAR  
12 WORKS.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

14 In addition to his General Objections, Mr. Burnett object to this Request on the  
15 grounds that it is overly broad, unduly burdensome, and to the extent it seeks  
16 documents that are neither relevant to any party's claims or defenses, nor proportional  
17 to the needs of the case. Mr. Burnett further objects to this Request on the grounds  
18 that the term "AXANAR WORKS" is vague, compound, and refers to multiple works,  
19 some of which have not yet been created.

20 **REQUEST FOR PRODUCTION NO. 30:**

21 All DOCUMENTS RELATED TO any postings YOU have made on social  
22 media, message boards, or any other website RELATED TO this ACTION, the  
23 AXANAR WORKS, the STAR TREK COPYRIGHTED WORKS, or PLAINTIFFS.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

25 In addition to his General Objections, Mr. Burnett objects to this Request on the  
26 grounds that it is overly broad, and to the extent it seeks documents that are neither  
27 relevant to any party's claims or defenses, nor proportional to the needs of the case.  
28 Mr. Burnett further objects to this Request to the extent it imposes obligations to

1 produce publicly available information, or to produce information that is equally or  
2 more easily available to Plaintiffs than it is to the non-party. Mr. Burnett further  
3 objects to this Request on the grounds that it is duplicative and burdensome to the  
4 extent it calls for documents already produced to Plaintiffs after a reasonably diligent  
5 search. Mr. Burnett further objects to this Request on the grounds that the term  
6 “AXANAR WORKS” is vague, compound, and refers to multiple works, some of  
7 which have not yet been created.

8 **REQUEST FOR PRODUCTION NO. 31:**

9 All DOCUMENTS RELATING TO PLAINTIFFS.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

11 In addition to his General Objections, Mr. Burnett objects to this Request on the  
12 grounds that it does not specify the documents sought with reasonable particularity as  
13 required by Federal Rule of Civil Procedure 45. Because the Request seeks “all  
14 documents relating to Plaintiffs,” Mr. Burnett further objects to this Request on the  
15 grounds that it is overly broad, and to the extent it seeks documents that are neither  
16 relevant to any party’s claims or defenses, nor proportional to the needs of the case.  
17 Mr. Burnett further objects to this Request on the grounds that it is duplicative and  
18 burdensome to the extent it calls for documents already produced to Plaintiffs after a  
19 reasonably diligent search. Mr. Burnett further objects to this Request on the grounds  
20 that the term “AXANAR WORKS” is vague, compound, and refers to multiple works,  
21 some of which have not yet been created.

22 **REQUEST FOR PRODUCTION NO. 32:**

23 All COMMUNICATIONS with PLAINTIFFS.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

25 In addition to his General Objections, Mr. Burnett objects to this Request on the  
26 grounds that it imposes undue burden and expense on a non-party when the discovery  
27 sought could have been readily produced by a party to the litigation. Mr. Burnett  
28 further objects to this Request on the grounds that it is vague and ambiguous, overly

1 broad, and to the extent it seeks documents that are neither relevant to any party's  
2 claims or defenses, nor proportional to the needs of the case. Mr. Burnett further  
3 objects on the grounds that this Request seeks documents that are equally available to  
4 Plaintiffs. Mr. Burnett further objects to this Request on the grounds that it is  
5 duplicative and burdensome to the extent it calls for documents already produced to  
6 Plaintiffs after a reasonably diligent search. Mr. Burnett further objects to this  
7 Request on the grounds that the term "AXANAR WORKS" is vague, compound, and  
8 refers to multiple works, some of which have not yet been created.

9 **REQUEST FOR PRODUCTION NO. 33:**

10 All DOCUMENTS RELATING TO any COMMUNICATIONS YOU had with  
11 any PLAINTIFFS.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

13 In addition to his General Objections, Mr. Burnett objects to this Request on the  
14 grounds that it is vague and ambiguous, overly broad, and to the extent it seeks  
15 documents that are neither relevant to any party's claims or defenses, nor proportional  
16 to the needs of the case. Mr. Burnett further objects to this Request to the extent it  
17 imposes obligations to produce documents that are equally or more easily available to  
18 Plaintiffs than they are to the non-party.

19 **REQUEST FOR PRODUCTION NO. 34:**

20 All COMMUNICATIONS RELATING TO this ACTION.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

22 In addition to his General Objections, Mr. Burnett objects to this Request on the  
23 grounds that it is vague and ambiguous, overly broad, and to the extent it seeks  
24 documents that are neither relevant to any party's claims or defenses, nor proportional  
25 to the needs of the case. Mr. Burnett further objects to this Request on the grounds  
26 that it is duplicative and burdensome to the extent it calls for documents already  
27 produced to Plaintiffs after a reasonably diligent search. Mr. Burnett further objects to  
28 this Request to the extent it calls for production of documents protected by the



1 attorney-client privilege and/or work product doctrine.

2 **REQUEST FOR PRODUCTION NO. 35:**

3 All DOCUMENTS RELATING TO Star Trek and/or the STAR TREK  
4 COPYRIGHTED WORKS.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

6 In addition to his General Objections, Mr. Burnett objects to this Request on the  
7 grounds that it is vague and ambiguous, overly broad, and to the extent it seeks  
8 documents that are neither relevant to any party's claims or defenses, nor proportional  
9 to the needs of the case. Mr. Burnett further objects to this Request on the grounds  
10 that it is duplicative and burdensome to the extent it calls for documents already  
11 produced to Plaintiffs after a reasonably diligent search.

12 **REQUEST FOR PRODUCTION NO. 36:**

13 All DOCUMENTS RELATING TO the rights to Star Trek and/or the STAR  
14 TREK COPYRIGHTED WORKS.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 36:**

16 In addition to his General Objections, Mr. Burnett objects to this Request on the  
17 grounds that it is vague and ambiguous as to the word "rights," and overly broad. Mr.  
18 Burnett further objects to this Request to the extent that it calls for a legal conclusion.  
19 Mr. Burnett further objects to this Request on the grounds that it is duplicative and  
20 burdensome to the extent it calls for documents already produced to Plaintiffs after a  
21 reasonably diligent search.

22 **REQUEST FOR PRODUCTION NO. 37:**

23 All DOCUMENTS RELATING TO the fundraising for the AXANAR  
24 WORKS.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

26 In addition to his General Objections, Mr. Burnett objects to this Request on the  
27 grounds that it imposes undue burden and expense on a non-party when the discovery  
28 sought could have been readily produced by a party to the litigation. Mr. Burnett



1 further objects to this Request on the grounds that it is vague and ambiguous, overly  
2 broad, and to the extent it seeks documents that are neither relevant to any party's  
3 claims or defenses, nor proportional to the needs of the case. Mr. Burnett further  
4 objects to this Request on the grounds that it is duplicative and burdensome to the  
5 extent it calls for documents already produced to Plaintiffs after a reasonably diligent  
6 search. Mr. Burnett further objects to this Request on the grounds that the term  
7 "AXANAR WORKS" is vague, compound, and refers to multiple works, some of  
8 which have not yet been created.

9 **REQUEST FOR PRODUCTION NO. 38:**

10 All DOCUMENTS RELATING TO the expenditure of funds on the AXANAR  
11 WORKS.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 38:**

13 In addition to his General Objections, Mr. Burnett objects to this Request on the  
14 grounds that it imposes undue burden and expense on a non-party when the discovery  
15 sought could have been readily produced by a party to the litigation. Mr. Burnett  
16 further objects to this Request on the grounds that it is vague and ambiguous, overly  
17 broad, and to the extent it seeks documents that are neither relevant to any party's  
18 claims or defenses, nor proportional to the needs of the case. Mr. Burnett further  
19 objects to this Request on the grounds that the term "AXANAR WORKS" is vague,  
20 compound, and refers to multiple works, some of which have not yet been created.

21 **REQUEST FOR PRODUCTION NO. 39:**

22 All DOCUMENTS RELATING TO how funds of investors in the AXANAR  
23 WORKS was spent.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 39:**

25 In addition to his General Objections, Mr. Burnett objects to this Request on the  
26 grounds that it imposes undue burden and expense on a non-party when the discovery  
27 sought could have been readily produced by a party to the litigation. Mr. Burnett  
28 further objects to this Request on the grounds that it is vague and ambiguous, overly

1 broad, and to the extent it seeks documents that are neither relevant to any party's  
2 claims or defenses, nor proportional to the needs of the case. Mr. Burnett further  
3 objects to this Request on the grounds that it is duplicative and burdensome to the  
4 extent it calls for documents already produced to Plaintiffs after a reasonably diligent  
5 search. Mr. Burnett further objects to this Request on the grounds that the term  
6 "AXANAR WORKS" is vague, compound, and refers to multiple works, some of  
7 which have not yet been created.

8 **REQUEST FOR PRODUCTION NO. 40:**

9 All DOCUMENTS showing which individuals received money with respect to  
10 the AXANAR WORKS, and how much money they received.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 40:**

12 In addition to his General Objections, Mr. Burnett objects to this Request on the  
13 grounds that it imposes undue burden and expense on a non-party when the discovery  
14 sought could have been readily produced by a party to the litigation. Mr. Burnett  
15 further objects to this Request on the grounds that it is vague and ambiguous, overly  
16 broad, and to the extent it seeks documents that are neither relevant to any party's  
17 claims or defenses, nor proportional to the needs of the case. Mr. Burnett further  
18 objects to this Request on the grounds that it is duplicative and burdensome to the  
19 extent it calls for documents already produced to Plaintiffs after a reasonably diligent  
20 search. Mr. Burnett further objects to this Request on the grounds that the term  
21 "AXANAR WORKS" is vague, compound, and refers to multiple works, some of  
22 which have not yet been created.

23 **REQUEST FOR PRODUCTION NO. 41:**

24 All DOCUMENTS RELATING TO any research conducted on Star Trek  
25 and/or the STAR TREK COPYRIGHTED WORKS in connection with the AXANAR  
26 WORKS.

27 **RESPONSE TO REQUEST FOR PRODUCTION NO. 41:**

28 In addition to his General Objections, Mr. Burnett objects to this Request on the

1 grounds that it is overly broad, duplicative and burdensome to the extent it calls for  
2 documents already produced to Plaintiffs after a reasonably diligent search. Mr.  
3 Burnett further objects to this Request on the grounds that the term “AXANAR  
4 WORKS” is vague, compound, and refers to multiple works, some of which have not  
5 yet been created.

6 **REQUEST FOR PRODUCTION NO. 42:**

7 Copies of all works RELATING TO Star Trek that YOU currently have in  
8 YOUR possession, custody, or control, or that YOU reviewed in connection with  
9 work performed by YOU on the AXANAR WORKS.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 42:**

11 In addition to his General Objections, Mr. Burnett objects to this Request on the  
12 grounds that it is overly broad, duplicative and burdensome to the extent it calls for  
13 documents already produced to Plaintiffs after a reasonably diligent search. Mr.  
14 Burnett further objects to this Request on the grounds that the term “AXANAR  
15 WORKS” is vague, compound, and refers to multiple works, some of which have not  
16 yet been created.

17 **REQUEST FOR PRODUCTION NO. 43:**

18 Copies of works utilized or relied upon by YOU in the creation of the  
19 AXANAR WORKS, including books, films, or television shows.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 43:**

21 In addition to his General Objections, Mr. Burnett objects to this Request on the  
22 grounds that it is overly broad, duplicative and burdensome to the extent it calls for  
23 documents already produced to Plaintiffs after a reasonably diligent search. Mr.  
24 Burnett further objects to this Request on the grounds that the term “AXANAR  
25 WORKS” is vague, compound, and refers to multiple works, some of which have not  
26 yet been created.

27 **REQUEST FOR PRODUCTION NO. 44.**

28 All DOCUMENTS RELATING TO any copyright applications for the

1 AXANAR WORKS submitted by YOU or on YOUR behalf, including, without  
2 limitation any COMMUNICATIONS RELATED TO YOUR decision to submit such  
3 applications.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 44:**

5 In addition to his General Objections, Mr. Burnett objects to this Request on the  
6 grounds that it is vague and ambiguous, overly broad, and to the extent it seeks  
7 documents that are neither relevant to any party's claims or defenses, nor proportional  
8 to the needs of the case. Mr. Burnett further objects to this Request on the grounds  
9 that the term "AXANAR WORKS" is vague, compound, and refers to multiple works,  
10 some of which have not yet been created.

11 **REQUEST FOR PRODUCTION NO. 45:**

12 Any copyright registrations RELATING TO the AXANAR WORKS.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 45:**

14 In addition to his General Objections, Mr. Burnett objects to this Request on the  
15 grounds that it is overly broad, unduly burdensome, and to the extent it seeks  
16 documents that are neither relevant to any party's claims or defenses, nor proportional  
17 to the needs of the case. Mr. Burnett further objects to this Request to the extent it  
18 imposes obligations to produce publicly available information, or to produce  
19 information that is equally or more easily available to Plaintiffs than it is to the non-  
20 party. Mr. Burnett further objects to this Request on the grounds that the term  
21 "AXANAR WORKS" is vague, compound, and refers to multiple works, some of  
22 which have not yet been created.

23 **REQUEST FOR PRODUCTION NO. 46:**

24 All pre-existing writings or audio-visual works upon which any AXANAR  
25 WORKS is based, and/or out of which any such AXANAR WORKS arose.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 46:**

27 In addition to his General Objections, Mr. Burnett objects to this Request on the  
28 grounds that it is duplicative and burdensome to the extent it calls for documents

1 already produced to Plaintiffs after a reasonably diligent search. Mr. Burnett further  
2 objects to this Request on the grounds that the term “AXANAR WORKS” is vague,  
3 compound, and refers to multiple works, some of which have not yet been created.

4 **REQUEST FOR PRODUCTION NO. 47:**

5 All DOCUMENTS that YOU contend support or establish the original  
6 conception, creation and writing of the AXANAR WORKS independent of the STAR  
7 TREK COPYRIGHTED WORKS.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 47:**

9 In addition to his General Objections, Mr. Burnett objects to this Request on the  
10 grounds that it is vague and ambiguous as to the phrase “support or establish the  
11 original conception, creation, and writing of the Axanar Works.” Mr. Burnett further  
12 objects to this Request on the grounds that it is duplicative and burdensome to the  
13 extent it calls for documents already produced to Plaintiffs after a reasonably diligent  
14 search. Mr. Burnett further objects to this Request on the grounds that the term  
15 “AXANAR WORKS” is vague, compound, and refers to multiple works, some of  
16 which have not yet been created.

17 **REQUEST FOR PRODUCTION NO. 48:**

18 All DOCUMENTS RELATING TO any plans to distribute the AXANAR  
19 WORKS.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 48:**

21 In addition to his General Objections, Mr. Burnett objects to this Request on the  
22 grounds that it imposes undue burden and expense on a non-party when the discovery  
23 sought could have been readily produced by a party to the litigation. Mr. Burnett  
24 further objects to this Request on the grounds that it is vague and ambiguous, overly  
25 broad, and to the extent it seeks documents that are neither relevant to any party’s  
26 claims or defenses, nor proportional to the needs of the case. Mr. Burnett further  
27 objects to this Request on the grounds that the term “AXANAR WORKS” is vague,  
28 compound, and refers to multiple works, some of which have not yet been created.

1 **REQUEST FOR PRODUCTION NO. 49:**

2 All DOCUMENTS RELATING TO the number of views online of the  
3 AXANAR WORKS.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 49:**

5 In addition to his General Objections, Mr. Burnett objects to this Request on the  
6 grounds that it imposes undue burden and expense on a non-party when the discovery  
7 sought could have been readily produced by a party to the litigation. Mr. Burnett  
8 further objects to this Request on the grounds that it is vague and ambiguous, overly  
9 broad, and to the extent it seeks documents that are neither relevant to any party's  
10 claims or defenses, nor proportional to the needs of the case. Mr. Burnett further  
11 objects to this Request on the grounds that the term "AXANAR WORKS" is vague,  
12 compound, and refers to multiple works, some of which have not yet been created.

13 **REQUEST FOR PRODUCTION NO. 50:**

14 All DOCUMENTS RELATING TO income earned from advertising dollars or  
15 any other source whatsoever for distributing any of the AXANAR WORKS.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 50:**

17 In addition to his General Objections, Mr. Burnett objects to this Request on the  
18 grounds that it imposes undue burden and expense on a non-party when the discovery  
19 sought could have been readily produced by a party to the litigation. Mr. Burnett  
20 further objects to this Request on the grounds that it is vague and ambiguous as to the  
21 word "income," and overly broad. Mr. Burnett further objects to this Request on the  
22 grounds that it is duplicative and burdensome to the extent it calls for documents  
23 already produced to Plaintiffs after a reasonably diligent search. Mr. Burnett further  
24 objects to this Request on the grounds that the term "AXANAR WORKS" is vague,  
25 compound, and refers to multiple works, some of which have not yet been created.

26 **REQUEST FOR PRODUCTION NO. 51:**

27 All COMMUNICATIONS with Youtube.com RELATING TO the AXANAR  
28 WORKS.



1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 51:**

2 In addition to his General Objections, Mr. Burnett objects to this Request on the  
3 grounds that it is overly broad, unduly burdensome, and to the extent it seeks  
4 documents that are neither relevant to any party's claims or defenses, nor proportional  
5 to the needs of the case. Mr. Burnett further objects to this Request on the grounds  
6 that the term "AXANAR WORKS" is vague, compound, and refers to multiple works,  
7 some of which have not yet been created.

8 **REQUEST FOR PRODUCTION NO. 52:**

9 All DOCUMENTS RELATING TO any efforts to monetize the AXANAR  
10 WORKS.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 52:**

12 In addition to his General Objections, Mr. Burnett objects to this Request on the  
13 grounds that it imposes undue burden and expense on a non-party when the discovery  
14 sought could have been readily produced by a party to the litigation. Mr. Burnett  
15 further objects to this Request on the grounds that it is vague and ambiguous as to the  
16 word "monetize," overly broad, and to the extent it seeks documents that are neither  
17 relevant to any party's claims or defenses, nor proportional to the needs of the case.  
18 Mr. Burnett further objects to this Request on the grounds that it is duplicative and  
19 burdensome to the extent it calls for documents already produced to Plaintiffs after a  
20 reasonably diligent search. Mr. Burnett further objects to this Request on the grounds  
21 that the term "AXANAR WORKS" is vague, compound, and refers to multiple works,  
22 some of which have not yet been created.

23 **REQUEST FOR PRODUCTION NO. 53:**

24 All DOCUMENTS showing revenue of the AXANAR WORKS.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 53:**

26 In addition to his General Objections, Mr. Burnett objects to this Request on the  
27 grounds that it imposes undue burden and expense on a non-party when the discovery  
28 sought could have been readily produced by a party to the litigation. Mr. Burnett



1 further objects to this Request on the grounds that it is vague and ambiguous as to the  
2 word “revenue,” overly broad, and to the extent it seeks documents that are neither  
3 relevant to any party’s claims or defenses, nor proportional to the needs of the case.  
4 Mr. Burnett further objects to this Request on the grounds that it is duplicative and  
5 burdensome to the extent it calls for documents already produced to Plaintiffs after a  
6 reasonably diligent search. Mr. Burnett further objects to this Request on the grounds  
7 that the term “AXANAR WORKS” is vague, compound, and refers to multiple works,  
8 some of which have not yet been created.

9 **REQUEST FOR PRODUCTION NO. 54:**

10 All DOCUMENTS RELATING TO the sale or distribution of products or any  
11 physical materials RELATING TO the AXANAR WORKS.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 54:**

13 In addition to his General Objections, Mr. Burnett objects to this Request on the  
14 grounds that it is vague and ambiguous as to the phrase “products or any physical  
15 materials,” and overly broad. Mr. Burnett further objects to this Request on the  
16 grounds that it is duplicative and burdensome to the extent it calls for documents  
17 already produced to Plaintiffs after a reasonably diligent search. Mr. Burnett further  
18 objects to this Request on the grounds that the term “AXANAR WORKS” is vague,  
19 compound, and refers to multiple works, some of which have not yet been created.

20 **REQUEST FOR PRODUCTION NO. 55:**

21 All DOCUMENTS regarding the design, manufacture, sale, and other  
22 distribution of products or any physical materials RELATING TO the AXANAR  
23 WORKS, including but not limited to all products sold through the Axanar store, and  
24 all products given to any donors of Axanar, or any other person.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 55:**

26 In addition to his General Objections, Mr. Burnett objects to this Request on the  
27 grounds that it imposes undue burden and expense on a non-party when the discovery  
28 sought could have been readily produced by a party to the litigation. Mr. Burnett

1 further objects to this Request on the grounds that it is vague and ambiguous as to the  
2 phrase “products or any physical materials,” and overly broad. Mr. Burnett further  
3 objects to this Request on the grounds that it is duplicative and burdensome to the  
4 extent it calls for documents already produced to Plaintiffs after a reasonably diligent  
5 search. Mr. Burnett further objects to this Request on the grounds that the term  
6 “AXANAR WORKS” is vague, compound, and refers to multiple works, some of  
7 which have not yet been created.

8 **REQUEST FOR PRODUCTION NO. 56:**

9 All COMMUNICATIONS with Kickstarter RELATING TO the AXANAR  
10 WORKS.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 56:**

12 In addition to his General Objections, Mr. Burnett objects to this Request on the  
13 grounds that it imposes undue burden and expense on a non-party when the discovery  
14 sought could have been readily produced by a party to the litigation. Mr. Burnett  
15 further objects to this Request on the grounds that it is vague and ambiguous, overly  
16 broad, and to the extent it seeks documents that are neither relevant to any party’s  
17 claims or defenses, nor proportional to the needs of the case. Mr. Burnett further  
18 objects to this Request on the grounds that it is duplicative and burdensome to the  
19 extent it calls for documents already produced to Plaintiffs after a reasonably diligent  
20 search. Mr. Burnett further objects to this Request on the grounds that the term  
21 “AXANAR WORKS” is vague, compound, and refers to multiple works, some of  
22 which have not yet been created.

23 **REQUEST FOR PRODUCTION NO. 57:**

24 All COMMUNICATIONS with Indiegogo RELATING TO the AXANAR  
25 WORKS

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 57:**

27 In addition to their General Objections, Mr. Burnett objects to this Request on  
28 the grounds that it imposes undue burden and expense on a non-party when the

1 discovery sought could have been readily produced by a party to the litigation. Mr.  
2 Burnett further objects to this Request on the grounds that it is vague and ambiguous,  
3 overly broad, and to the extent it seeks documents that are neither relevant to any  
4 party's claims or defenses, nor proportional to the needs of the case. Mr. Burnett  
5 further objects to this Request on the grounds that it is duplicative and burdensome to  
6 the extent it calls for documents already produced to Plaintiffs after a reasonably  
7 diligent search. Mr. Burnett further objects to this Request on the grounds that the  
8 term "AXANAR WORKS" is vague, compound, and refers to multiple works, some  
9 of which have not yet been created.

10 Dated: October 10, 2016

**WINSTON & STRAWN LLP**

11  
12 By: /s/ Erin R. Ranahan  
13 Erin R. Ranahan  
14 Diana Hughes Leiden  
15 Kelly N. Oki  
16 Attorneys for  
17 Robert Meyer Burnett  
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**CERTIFICATE OF SERVICE**  
**United States District Court for the Central District of California**  
***Paramount Pictures v. Axanar Productions, Inc., et al.***  
**Case No. 2:15-cv-09938-RGK-E**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Winston & Strawn LLP, 333 S. Grand Avenue, Los Angeles, CA 90071-1543. On October 10, 2016, I served the following documents:

**ROBERT MEYER BURNETT'S RESPONSES AND OBJECTIONS TO  
DEPOSITION SUBPOENA AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS**

by placing a copy of the documents listed above in an envelope designated as **Federal Express-Overnight Delivery** and addressed to the persons as set forth below, in accordance with Federal Rule of Civil Procedure 5(b)(2)(C). I am readily familiar with the firm's business practice for collection and processing of correspondence for delivery by **Federal Express-Overnight Delivery**. On the same day, as referenced above, correspondence is placed for collection by Federal Express, with whom we have a direct billing account for payment of said delivery, to be delivered to the office of the addressee as set forth below on the next business day.

|  |   |
|--|---|
| David Grossman<br>Jennifer Jason<br>LOEB & LOEB LLP<br>10100 Santa Monica Blvd., Suite 2200<br>Los Angeles, CA 90067<br>T: 310.282.2000<br>F: 310.282.2200<br>Email: <a href="mailto:dgrossman@loeb.com">dgrossman@loeb.com</a><br>Email: <a href="mailto:jjason@loeb.com">jjason@loeb.com</a> | Attorneys for Plaintiffs<br>PARAMOUNT PICTURES<br>CORPORATION AND CBS STUDIOS |
| Jonathan Zavin<br>LOEB & LOEB LLP<br>345 Park Avenue<br>New York, NY 10154<br>T: 212.407.4000<br>F: 212.407.4990<br>Email: <a href="mailto:jzavin@loeb.com">jzavin@loeb.com</a>  | Attorneys for Plaintiffs<br>PARAMOUNT PICTURES<br>CORPORATION AND CBS STUDIOS |

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Signed: \_\_\_\_\_  
Robert Massing

Dated: October 10, 2016

LA:417168.8