

**EXHIBIT C TO
DECLARATION OF DAVID GROSSMAN**

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Certified Copy

PARAMOUNT PICTURES)
CORPORATION, a Delaware)
corporation; and CBS)
STUDIOS, INC., a Delaware)
corporation,)

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

) Plaintiffs,)

) vs.)

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

) Defendants.)
)

VIDEOTAPED DEPOSITION OF CHRISTIAN GOSSETT

Date and Time: Saturday, October 22, 2016
10:14 a.m. - 4:59 p.m.

Location: 10100 Santa Monica Boulevard, Suite 2200
Los Angeles, California

Reporter: Vicki A. Saber, CSR, RPR, CRR, CCRR, CLR
Certificate No. 6212

Job No. 8142

1 A. "Don't make it look like fifties sci-fi."

2 Q. Did he tell you what he did want it to look
3 like?

4 A. He wanted it to look like 20 years before the
11:17 5 voyage of Kirk and Spock and the Enterprise. 20 years
6 before the original series.

7 (Exhibit 132 was marked for
8 identification.)

9 BY MR. GROSSMAN:

11:17 10 Q. I've had marked as Exhibit 132 an email dated
11 April 26, 2014, from you to Mr. Peters and
12 Ms. Webberley.

13 Do you -- is this in fact an email you sent on
14 or about that date?

11:18 15 A. It is.

16 Q. And you list a number of notes. The first one
17 is Inverness. You say, "I really like the word
18 Inverness, and we have more than enough major deviations
19 from the FASA," F-A-S-A, "book already so that's not
11:18 20 really a case against it, including the major one, where
21 we've given much more significance to the Battle of
22 Axanar. If we're using the FASA book as a bible, then
23 we're already not doing it consistently."

24 What's the FASA book that you're referring to?

11:18 25 A. I'm referring to a FASA book that I believe is

1 entitled, "The Four Years War."

2 Q. And was that a supplement to the Star Trek
3 role-playing game?

4 A. It was a licensed supplement to the Star Trek
11:18 5 role-playing game.

6 Q. Did you review that Four Years War supplement?

7 A. I did.

8 Q. And was that something that you used as source
9 material to work on the Axanar project?

11:19 10 A. It wasn't of much use, but for diligence sake
11 I looked through it.

12 Q. And when you say "if we're using the FASA book
13 as a bible," what were you referring to?

14 A. Alec was -- well, Prelude to Axanar takes
11:19 15 place during The Four Years War, and so Alec used this
16 book as a bible, essentially a kind of baseline. Design
17 style bible. "Bible" used in the context of style for
18 the creation of the assets of the show. Assets being
19 costumes, weapons, environmental designs. And I
11:19 20 pushed -- this is me pushing against using it as a bible
21 because of the inconsistencies that he wanted on the one
22 hand. He -- on the one hand he wanted us to use FASA
23 stuff as a bible, quote-unquote, but then he also wanted
24 other things as well, and so I was calling him out on
11:20 25 that inconsistency.

1 Q. Did Mr. Peters actually give you a copy of
2 that book --

3 A. He did.

4 Q. -- the FASA book?

11:20 5 A. Yes. Sorry.

6 Sorry, Vicki.

7 Q. So you didn't already have that particular
8 supplement?

9 A. I did not. That is a hard book to find from
11:20 10 what I hear.

11 (Exhibit 133 was marked for
12 identification.)

13 BY MR. GROSSMAN:

14 Q. Mr. Gossett, I've marked as Exhibit 133 an
11:20 15 April 4, 2014 email from you to Mr. Peters. And my
16 first question is just did you send this email to
17 Mr. Peters on or about April 4, 2014?

18 A. I did.

19 Q. It's entitled "Please Look" -- the subject is
11:21 20 "Please Look" dash "Images for Kevin." And the text of
21 your email says, "Kevin needs to see any changes we want
22 for Kharn," K-H-A-R-N, "so this is what I was thinking."

23 Who is the Kevin that you are referring to
24 here?

11:21 25 A. That would be Kevin Haney, a makeup artist.

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DECLARATION UNDER PENALTY OF PERJURY

I, CHRISTIAN GOSSETT, hereby declare under penalty of perjury that the foregoing is my deposition under oath;

Are the questions asked of me and my answers thereto;

And that I have read same and have made the necessary corrections, additions, or changes to my answers that I deem necessary.

In witness thereof, I hereby subscribe my name this _____ day of _____, _____.

CHRISTIAN GOSSETT

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COUNTY OF LOS ANGELES,)
STATE OF CALIFORNIA,)

I, Vicki A. Saber, Certified Shorthand Reporter licensed in the State of California, License No. 6212, hereby certify that the deponent was by me first duly sworn and the foregoing testimony was reported by me and was thereafter transcribed with Computer-Aided Transcription; that the foregoing is a full, complete, and true record of said proceeding.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing proceeding and caption named or in any way interested in the outcome of the cause in said caption. The dismantling, unsealing, or unbinding of the transcript will render the reporter's certificates null and void.

In witness whereof, I have hereunto set my hand this 29th day of October, 2016.

- Reading and Signing was requested.
- Reading and Signing was waived.
- Reading and Signing was not requested.

VICKI A. SABER, CSR NO. 6212, RPR, CRR, CCRR