

1 LOEB & LOEB LLP  
DAVID GROSSMAN (SBN 211326)  
2 dgrossman@loeb.com  
JENNIFER JASON (SBN 274142)  
3 jjason@loeb.com  
10100 Santa Monica Blvd., Suite 2200  
4 Los Angeles, CA 90067  
Telephone: 310.282.2000  
5 Facsimile: 310.282.2200

6 LOEB & LOEB LLP  
JONATHAN ZAVIN (admitted *pro hac vice*)  
7 jzavin@loeb.com  
345 Park Avenue  
8 New York, NY 10154  
Telephone: 212.407.4000  
9 Facsimile: 212.407.4990

10 Attorneys for Plaintiffs  
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.  
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21 AXANAR PRODUCTIONS, INC., a  
California corporation; ALEC PETERS,  
an individual, and DOES 1-20,  
22

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

**DECLARATION OF DAVID  
GROSSMAN IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION IN  
LIMINE NO. 4**

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

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**DECLARATION OF DAVID GROSSMAN**

I, DAVID GROSSMAN, declare as follows:

1. I am an attorney licensed to practice law in the State of California and am an associate with the law firm of Loeb & Loeb LLP (“Loeb”), attorneys of record for Paramount Pictures Corporation (“Paramount”) and CBS Studios Inc. (“CBS”) (collectively, “Plaintiffs”) in the above-captioned matter. The following is of my own personal knowledge, and if called as a witness, I could and would competently testify thereto.

2. **Exhibit A** (confidential document filed under seal) is a true and correct copy of version 7.7 of the Axanar Script, dated November 26, 2015.

3. Mr. Peters testified [REDACTED]. **Exhibit B** (Peters tr. 77:5-9) (confidential document filed under seal) is a true and correct copy of the relevant excerpt from the deposition of Alec Peters taken on October 19, 2016.

4. **Exhibit C** (confidential document filed under seal) is a true and correct copy of the Axanar Electronic Press Kit featuring concept art produced for *Prelude to Axanar* and the Axanar Motion Picture. See **Exhibit B** (Peters tr. at 124:11-21).

5. **Exhibit D** (confidential document filed under seal) is a true and correct copy of a document produced by Defendants containing concept art of phasers. Attached hereto as **Exhibit E** (Gossett tr. at 27:16-29:16) is a true and correct copy of the relevant excerpt from the deposition transcript of Christian Gossett, director of *Prelude to Axanar*, taken on October 22, 2016.

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

Executed this 6th day of January, 2017, at Los Angeles, California.

/s/David Grossman  
David Grossman