

EXHIBIT G

From: Ranahan, Erin R. <ERanahan@winston.com>
Sent: Thursday, October 27, 2016 3:20 AM
To: David Grossman; Jonathan Zavin; Jennifer Jason
Cc: Oki, Kelly; Leiden, Diana Hughes; Coorg, Shilpa A.; Mornin, Joe
Subject: RE: Paramount Pictures Corporation et al. v. Axanar Productions, et al., Case No. 2:15-cv-09938-RGK-E-CONFIDENTIAL

David,

Please provide the third party productions you have obtained (through subpoenas or otherwise) in connection with this case, including the "dozens" of emails, and the "hundreds, if not thousands" of pages of emails from Mr. Gossett, plus anything you obtained from Indiegogo, Kickstarter, Mr. McIntosh, etc. Once we receive and review those productions, we can further investigate whether these (or any related) documents are responsive to any particular requests, are relevant, the time frame in which they occurred, and whether they remain within Defendants' possession, custody or control. In any event, it appears that Plaintiffs were more efficiently able to collect these documents from third parties, who presumably you paid to locate a narrow set of communications involving Alec and Axanar. Defendants undertook a reasonably diligent search and produced anything remotely relevant that they could locate. To the extent Alec testified that he did not delete "relevant" emails, that is obviously subject to the understanding about what is relevant, and his recollection about what emails he deleted years ago. Defendants could not produce emails that they did not find after a reasonably diligent search, and did not produce emails they determined were not responsive, not relevant, or the burden in obtaining them was not proportional to the needs of the case.

With respect to Internet postings that Plaintiffs have been able to obtain from public sources, Defendants do not maintain copies of every online posting they participated in. Both Alec and Mr. Burnett expressed their views extensively in the public. There is no a secret public trove to uncover. It is not proportionally relevant to have Defendants scour the Internet to see if a cumulative, redundant post can be duplicated. You have gotten plenty of public commentary from Defendants, and Defendants do not have an obligation to supplement your public investigations, especially when the substance of the communications are marginally relevant to this case. Given the disparity in the resources between Plaintiffs and Defendants, and given that it is Plaintiffs that believe these postings are relevant, Plaintiffs are in a better position to pay the costs of collection. Obviously Plaintiffs have had no trouble locating social media posts by Defendants, or being provided these through various sources, as evidenced in your amended complaint and deposition exhibits.

With one week left in discovery, it is far too late for you to now attempt to start over the electronic discovery collection from scratch. We are available to hold a discussion about what documents you believe are necessary to prosecute your claims before we embark on expensive efforts for evidence that at this point is cumulative, burdensome to obtain, most likely irrelevant and inconsequential. As you know, the proportionality requirements require us to weigh the cost of obtaining discovery, and given that you have them already, and they are cumulative in that they repeat the same messages or involve irrelevant sideshow drama, undertaking these efforts on a fishing expedition would not be worth the effort, especially in a case like this where such emails will have no legal consequence.

With respect to your request for a privilege log, I am perplexed by your newfound desire to obtain a privilege log, as you and Jonathan have both told me repeatedly that you find them useless, and told me about a case where the Court did not require you to produce one. Why the sudden change of heart? Is there actually something you are specifically concerned about that you believe we have improperly withheld as privileged? You have not identified any type of communication that you question the privilege designation (instead you reference communications that are undoubtedly privileged), and surely you do not believe that every communication Alec had with a lawyer is relevant to Axanar or should be logged. I have never represented that Alec has not had discussions with other lawyers at any

point. What I intended with my last written communication on this was that when we collected all Axanar documents, we intentionally did not collect the attorney communications folder, so did not load them into the system, as it is an entire folder that is dedicated to Alec's attorney discussions, for any matter, for any purpose. What I have now asked you multiple times, is--what attorney communications are you interested in us collecting, reviewing and including on the privilege log? I have still not been provided with a response. And for what requests do you believe these are called for? Perhaps it will be easier to discuss.

We are not willing to de-designate the financial information, which contain Alec's preliminary Quicken notes, is not verified by any accounting, and is currently in the process of being reviewed by the accountant. Given the sensitivities with donors, which has stemmed largely from the delay that this lawsuit has caused, there is serious harm that is threatened to Defendants if these preliminary documents were shared with and misused by those that have a personal vendetta to destroy Alec's lifelong fanhood, finances, reputation, and dreams of creating *Axanar*. This includes not only Plaintiffs, but third parties who have had extensive discussions with Plaintiffs and seek to leak information deemed confidential in the lawsuit in an effort to bring down Alec. Obviously the confidentiality obligations we have agreed to amongst counsel have not been perfectly followed by your clients (e.g., you made clear that the fact of having the initial settlement discussions was to remain confidential, but then your client publicly announced that settlement talks are happening; Van Citters was shown a document marked highly confidential during Alec's deposition). Also you have already included in public pleadings certain information from these documents without filing them under seal. Defendants are not comfortable de-designating that document, including based on the carelessness that Plaintiffs have displayed for confidentiality agreements.

Please stop suggesting that I received your letter on October 3 and gave you "no response." As we all know, my receipt of the letter was delayed until October 19 because you inexplicably, contrary to how we have been operating the entire case, hand delivered a letter to only my attention, rather than email it to the team, during a week when I was out of town. Consequently, I did not see the letter until October 19. As you experienced the past Monday in your own office, messenger rooms are not infallible. This is why we provide you the courtesy of a courtesy email. I once again reiterate my request that you extend us this same basic courtesy.

It is amazing to me, especially after you produced key chain of title documents the night before your client's 30(b)(6) deposition that included a topic on ownership, that you are attempting to bind me to a unilateral offer I gave to endeavor to produce documents three days before the subpoenas actually require documents to be produced. You responded to my proposal that it was "not sufficient." Obviously you did not interpret that as us creating such an agreement, as the deposition of Plaintiffs' representative is starting in just a few hours, and yet we still do not have the documents you promised we would get in the advance of her deposition.

Finally, we are producing some additional items this Friday. So that you may ask Alec about those and any other documents you have obtained since his last deposition, we will make him available for no more than two hours of a deposition. The deposition would be limited to asking questions about documents received after his last deposition. How about one of the mornings before J.J. or Justin's depositions?

Regards,

-Erin

Erin R. Ranahan
Partner
Winston & Strawn LLP
T: +1 (213) 615-1700
D: +1 (213) 615-1835
F: +1 (213) 615-1750
<http://www.winston.com>

-----Original Message-----

From: David Grossman [mailto:dgrossman@loeb.com]

Sent: Wednesday, October 26, 2016 10:21 AM

To: Ranahan, Erin R.

Cc: Jennifer Jason; Jonathan Zavin; Leiden, Diana Hughes; Oki, Kelly

Subject: RE: Paramount Pictures Corporation et al. v. Axanar Productions, et al., Case No. 2:15-cv-09938-RGK-E

Erin,

We now have dozens of emails between the director, Christian Gossett, and Alec Peters, your client, that were not produced by Mr. Peters. Mr. Peters, at his deposition, testified that he did not delete relevant emails, yet Mr. Gossett produced hundreds, if not thousands, of pages of emails with Mr. Peters that Mr. Peters did not turn over. This recent production confirms what Jonathan Zavin and I discussed with you last week after Mr. Peters' deposition, which is that Mr. Peters did not produce all of his emails relating to the production of Axanar. This is further confirmed by the fact that neither Mr. Burnett nor Mr. Peters turned over e-mails between them, and, in fact, Mr. Peters turned over virtually no e-mails regarding the production of Axanar, or with the production team, but only e-mails regarding donors. It seems apparent that Mr. Peters has improperly withheld e-mails relating to the production of the Axanar Works - emails that go to the heart of the claims in this case.

This is in addition to the fact, confirmed by both Mr. Burnett and Mr. Peters that they did not search for or produce any of the many online posting that they made regarding the Axanar works, including on Facebook, AxanarProductions.com, or various message boards and websites. Your position has been that such documents are "public" but Plaintiffs do not have an obligation to scour the internet for every posting made by your clients - and your clients' failure to turn these documents over in discovery has prejudiced Plaintiffs in connection with the depositions of Mr. Burnett and Mr. Peters, as well as in connection with all of the third party depositions that have been taken. Your statement that I "explicitly rejected" your representation that documents would be produced three days prior to all depositions of witnesses you represented is inaccurate. I have reviewed the email you referenced and it says no such thing.

Your email also says that you have now located additional emails from Mr. Peters that were not produced. Given these circumstances, we need all of Mr. Peters e-mails and documents regarding Axanar turned over to us immediately, along with the documents and e-mails of the other clients you represent, such as Mr. Burnett. Further, we need you to certify that all such documents have been turned over, or that you have examined the relevant computers, and there are no such e-mails. Further, when these documents are turned over, it is more than reasonable for you to present Mr. Peters for a further deposition. Please confirm that you will do so. If we do not hear from you by noon tomorrow, we will assume that you are not willing to certify that all documents and e-mails have either been turned over or do not exist, and we will further assume that you are not willing to make Mr. Peters available for a further deposition regarding these documents.

Additionally, you stated, on Monday September 26, 2016 "we are not withholding anything from before the lawsuit was filed as privileged" - yet Mr. Gossett's deposition this Saturday confirmed that Alec Peters was, in fact, represented by counsel prior to the litigation, and that his counsel was actively creating legal documents and agreements relating to the Axanar production. Mr. Peters himself testified last week that he engaged counsel to assist him with his Axanar project (and Axanar Productions paid that counsel thousands of dollars). While Peters may have initially advised you that he did not engage in communications with counsel prior to the lawsuit, the emails turned over by Mr. Gossett (and Mr. Peters' deposition testimony) demonstrate that is not the case. Please provide a privilege log addressing the pre-lawsuit communications that have been withheld.

Our October 3, 2016 letter requested that the financial document showing how Mr. Peters spent the funds gathered from fans be de-designated. After receiving no response, we requested that this document be de-designated last week, the day of Mr. Peters' deposition. Finally, this week I reiterated that request and you have not agreed to de-designate. As with Mr. Peters' deposition, if we do not hear from you by noon, we will assume that Mr. Peters is not willing to de-designate that document.

David Grossman
Loeb & Loeb LLP
10100 Santa Monica Blvd. Suite 2200
Los Angeles, CA 90067
Tel: 310.282.2077
Fax: 310.919.3943

-----Original Message-----

From: Ranahan, Erin R. [mailto:ERanahan@winston.com]
Sent: Monday, October 24, 2016 8:59 PM
To: David Grossman
Cc: Jennifer Jason; Jonathan Zavin; Leiden, Diana Hughes; Oki, Kelly
Subject: RE: Paramount Pictures Corporation et al. v. Axanar Productions, et al., Case No. 2:15-cv-09938-RGK-E

David,

You explicitly rejected my offer to produce documents three days in advance of third party witnesses' depositions. (See your 9/29, 6:13 pm email). Again, the production is all more recent scripts, and you have not asked a single specific question about the content of the scripts, so I am sure you can review the dates on the cover in advance of Bill's deposition to ask him your questions. We will produce Mr. Hunt once. If you don't want to proceed tomorrow, let us know within the next hour. I also recall you produced the missing ownership documents on 9/27, the night before the 30(b)(6) deposition of CBS on 9/28, and those were not documents called for by a subpoena to a third party, but asked of the Plaintiffs many months prior. Of course that was after we had spent time unnecessary time preparing an entire joint stipulation of a motion to compel section about ownership.

With respect to the letter that you messengered, only to me and not anyone else on the team (which as I explained, came in when I was out of town at the ABTL conference in Maui through 10/9), I still am at a loss as to why you would not have also emailed that to our team if you wanted to make sure we saw it as soon as possible. We could have responded much earlier had I or someone else on my team received it. Please make sure to email a courtesy copy of all correspondence through the rest of this case to Diana, Kelly and me, as we have done throughout this case. I am also at a loss why you did not mention the letter in the many times we saw each other at depositions since. In any event, since I first saw the letter after Alec's deposition last Wednesday, we have been investigating to see if there were any issues with the production.

As far as the issues raised with respect to email productions, Jennifer told me last week that there was not a single email between Alec and CBS. Upon investigating that claim, this is not true (see e.g., AX029227). With respect to the remainder of the emails that CBS, Alec turned over all of his emails relating to Axanar that were still in his possession when this lawsuit was filed. We have produced those emails that are remotely relevant to this case. We located 161 emails that were marked "non-responsive," so I personally went through those and have marked some additional emails for production (nothing with CBS but there are a some Gossett emails). We will produce those to you this week.

It sounds like otherwise, you have been able to find the communications and social media postings you are looking for through other sources, and your apparent need to obtain duplicate copies of those posts are outweighed by the burden and expense it would cost for Defendants to attempt to pull copies from their thousands of online postings, only to reproduce what you already have. As this is an individual and a tiny company with very limited resources, Defendants simply did not have in place the same archiving methods you might expect from most corporate clients, and yet, to date, we have still not received a single email from Paramount. And speaking of the dearth of Paramount emails, Jonathan

mentioned last week that you searched twenty separate Paramount custodians and found nothing-- can you please provide the names of those custodians and the search terms used?

With respect to the remaining documents referenced in Jennifer's October letter, we are not withholding anything that was within Defendants' possession, custody or control, though I can go through those over the phone with someone this week if you would like to discuss further.

And just to confirm, we do not intend to make Mr. Peters available for another deposition.

Regards,

-Erin

Erin R. Ranahan
Partner
Winston & Strawn LLP
T: +1 (213) 615-1700
D: +1 (213) 615-1835
F: +1 (213) 615-1750
<http://www.winston.com>

-----Original Message-----

From: David Grossman [mailto:dgrossman@loeb.com]
Sent: Monday, October 24, 2016 5:38 PM
To: Ranahan, Erin R.
Cc: Jennifer Jason; Jonathan Zavin; Leiden, Diana Hughes; Oki, Kelly
Subject: RE: Paramount Pictures Corporation et al. v. Axanar Productions, et al., Case No. 2:15-cv-09938-RGK-E

Erin,

Bill Hunt's deposition is tomorrow. You previously agreed to provide documents from third party witnesses you were representing three days before their depositions. That, unfortunately, has not happened for any of the third party deponents you have represented (Rob Burnett, Diana Kingsbury, or Bill Hunt). I haven't seen these documents as of yet, and there are apparently 4,000 pages of documents going by the email from your paralegal.

We will reserve the right to take Mr. Hunt's deposition again once these documents have been reviewed.

With respect to the meet and confer letter you are referencing, that was sent, by personal delivery to your office on October 3. It was not "recently messengered" - it was sent three weeks ago. In that letter, we asked a number of questions about your clients' document production. None of those issues have been addressed. We discussed that fact last week, after Mr. Peters' deposition. One of the issues raised in that letter is your designation as "highly confidential" of the document showing Mr. Peters' expenditures of the money raised to make the Axanar Works. You have not responded to that letter, or to our request, reiterated last week, that the document be de-designated. Please respond.

Finally, as you know, Rob Burnett testified that he did not produce emails or text messages relating to the creation of the Axanar Works or this lawsuit. On Saturday, we deposed Christian Gossett, the director of Prelude To Axanar, which was co-written and produced by your client Alec Peters. Mr. Gossett produced several hundred pages of emails between himself and Mr. Peters - documents that were not produced by Mr. Peters. Last week, after Mr. Peters' deposition, Mr. Zavin and I discussed with you the lack of emails in Mr. Peters' production. At that time, our questions to you were based on the lack of virtually any email record between Mr. Peters and the other members of the production team, including Rob Burnett, Bill Hunt, Diana Kingsbury and Christian Gossett. Mr. Gossett's production

shows that virtually none of the communications that Mr. Peters had with the director of Prelude to Axanar were turned over prior to Mr. Peters' deposition. Also, as we explained last week, there were many communications between CBS and Alec Peters that were produced by CBS, but were not produced by Alec Peters.

You have not provided any explanation for Mr. Peters' failure to produce these documents. Please confirm that you will be making Mr. Peters available for another deposition so that he can be examined regarding all of the documents that he did not produce in advance of his deposition.

David Grossman
Loeb & Loeb LLP
10100 Santa Monica Blvd. Suite 2200
Los Angeles, CA 90067
Tel: 310.282.2077
Fax: 310.919.3943

-----Original Message-----

From: Ranahan, Erin R. [mailto:ERanahan@winston.com]
Sent: Monday, October 24, 2016 5:11 PM
To: David Grossman
Cc: Jennifer Jason; Jonathan Zavin; Leiden, Diana Hughes; Oki, Kelly
Subject: Re: Paramount Pictures Corporation et al. v. Axanar Productions, et al., Case No. 2:15-cv-09938-RGK-E

David,

I'm not sure what being in front of the Magistrate has to do with anything. I understand the drive was sent to LA? Did it go to NY? We had planned to send this out Thursday but our paralegal had trouble, so we sent it to you as soon as we could. These documents are more recent scripts we obtained from Mr. Hunt.

I find your questioning ironic when you inexplicably recently messengered a letter only to my attention, copying no one else from the team, and without sending a courtesy email to let us know anything was coming.

Regards,

-Erin

Sent from my iPhone

On Oct 24, 2016, at 4:59 PM, David Grossman <dgrossman@loeb.com<mailto:dgrossman@loeb.com>> wrote:

Erin,

Can you explain why, after we left the Magistrate's Court on Friday, you sent a drive with documents relating to this case from Los Angeles to New York for Monday delivery?

Also, please let me know what these documents are.

David Grossman
Loeb & Loeb LLP

10100 Santa Monica Blvd. Suite 2200
Los Angeles, CA 90067
Tel: 310.282.2077
Fax: 310.919.3943

From: Lawrence, Susan P. [mailto:SLawrence@winston.com]
Sent: Monday, October 24, 2016 4:35 PM
To: Jennifer Jason; Jonathan Zavin; David Grossman
Cc: Leiden, Diana Hughes; Ranahan, Erin R.; Oki, Kelly
Subject: RE: Paramount Pictures Corporation et al. v. Axanar Productions, et al., Case No. 2:15-cv-09938-RGK-E

Hi,
It was delivered at 9:16 AM and signed for by R. Aceno. It was sent to the attention of Jonathan Zavin.

Susan

Susan P. Lawrence

Paralegal

Winston & Strawn LLP

T: +1 (213) 615-1700

D: +1 (213) 615-1836

F: +1 (213) 615-1750

winston.com<<http://www.winston.com>>

<image001.jpg>

From: Jennifer Jason [mailto:jjason@loeb.com]
Sent: Monday, October 24, 2016 4:32 PM
To: Lawrence, Susan P.; Jonathan Zavin; David Grossman
Cc: Leiden, Diana Hughes; Ranahan, Erin R.; Oki, Kelly
Subject: RE: Paramount Pictures Corporation et al. v. Axanar Productions, et al., Case No. 2:15-cv-09938-RGK-E

Counsel,

We have not received a drive from you. Did it go out on Friday?

Thanks,

Jennifer

Jennifer Jason
Attorney At Law
[Loeb & Loeb LLP]<<http://www.loeb.com/>>
10100 Santa Monica Blvd., Suite 2200 | Los Angeles, CA 90067 Direct Dial: 310.282.2195 | Fax: 310.919.3614 | E-mail:
jjason@loeb.com<<mailto:jjason@loeb.com>>

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www.loeb.com<http://www.loeb.com>

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From: Lawrence, Susan P. [mailto:SLawrence@winston.com]
Sent: Friday, October 21, 2016 12:09 PM
To: Jonathan Zavin; David Grossman; Jennifer Jason
Cc: Leiden, Diana Hughes; Ranahan, Erin R.; Oki, Kelly
Subject: Paramount Pictures Corporation et al. v. Axanar Productions, et al., Case No. 2:15-cv-09938-RGK-E

Counsel,
We are sending out a document production bearing bates number AX031221 - AX035291.
They are going out via federal express today for a Monday morning delivery.
The flash drive is encrypted.
The password is @WinstOnWay

Susan Lawrence

Susan P. Lawrence

Paralegal

Winston & Strawn LLP
333 S. Grand Avenue
Los Angeles, CA 90071-1543

D: +1 (213) 615-1836

F: +1 (213) 615-1750

VCard<http://content.winston.com/sitefiles/wsvcards/16633.vcf> | Email<mailto:slawrence@winston.com> |
winston.com<http://www.winston.com>

<image001.jpg>

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