

**EXHIBIT 14 TO OKI DECLARATION**

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10 Attorneys for Plaintiffs  
11 PARAMOUNT PICTURES  
12 CORPORATION and CBS STUDIOS  
13 INC.

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA

16 PARAMOUNT PICTURES  
17 CORPORATION, a Delaware  
18 corporation; and CBS STUDIOS INC.,  
19 a Delaware corporation,

18 Plaintiffs,

19 v.

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

23 Defendants.

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

**PARAMOUNT PICTURES  
CORPORATION'S RESPONSES  
TO REQUESTS FOR  
ADMISSION, SET TWO**

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1 PROPOUNDING PARTY: Defendants Axanar Productions, Inc. and Alec  
2 Peters

3 RESPONDING PARTY: Plaintiff Paramount Pictures Corporation

4 SET NO.: TWO

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6 Pursuant to Rule 36 of the Federal Rules of Civil Procedure, plaintiff  
7 Paramount Pictures Corporation (“Paramount”), by and through its undersigned  
8 counsel, hereby objects and responds to Defendants Axanar Productions, Inc. and  
9 Alec Peters’ First Set of Requests for Admissions (the “Requests”) as follows:

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11 **GENERAL OBJECTIONS**

12 The following General Objections apply to and are incorporated in each  
13 individual response herein, whether or not expressly incorporated by reference in  
14 such response.

15 1. Paramount objects to the Requests to the extent they purport to impose  
16 obligations beyond those required by the Federal Rules of Civil Procedure and to the  
17 extent they seek information beyond that permitted by such Rules, including,  
18 without limitation, information protected by the attorney-client, attorney work  
19 product or other relevant privileges.

20 2. Paramount objects to the Requests to the extent that they are vague,  
21 ambiguous, overbroad and/or fail to describe the information sought with reasonable  
22 particularity and, therefore, require Paramount, to the best of its ability, to make a  
23 subjective determination as to what information or proposition is sought to be  
24 admitted.

25 3. Paramount objects to the Requests to the extent that they are compound  
26 and in violation of the rule that “[e]ach matter of which an admission is requested be  
27 separately set forth.” Fed. R. Civ. P. 36.

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1 admits that it has not been able to quantify such amounts, but denies that no market  
2 harm has resulted from the public display of the Axanar Works.

3 **REQUEST NO. 73:**

4 Admit that You are unaware of revenues associated with Star Trek  
5 Copyrighted Works lost as a result of the Axanar Works.

6 **RESPONSE TO REQUEST NO. 73:**

7 Paramount incorporates the General Objections as though fully set forth  
8 herein. Paramount further objects to this Request as irrelevant. Paramount further  
9 objects to this Request as premature in light of the fact that discovery in this case is  
10 ongoing. Subject to and without waiving the foregoing objections or General  
11 Objections, Paramount responds as follows:

12 Paramount admits that it is not aware of a specific dollar amount of revenue  
13 associated with Star Trek Copyrighted Works lost as a result of the Axanar Works,  
14 and admits that it has not been able to quantify such amounts, but denies that no  
15 market harm has resulted from the public display of the Axanar Works.

16 **REQUEST NO. 74:**

17 Admit that You are unaware of any impact on the market value of the Star  
18 Trek Motion Pictures caused by the Axanar Works.

19 **RESPONSE TO REQUEST NO. 74:**

20 Paramount incorporates the General Objections as though fully set forth  
21 herein. Subject to and without waiving the foregoing objections or General  
22 Objections, Paramount responds as follows:

23 Deny.

24 **REQUEST NO. 75:**

25 Admit that You are unaware of any impact on the market value of the Star  
26 Trek Copyrighted Works caused by the Axanar Works.

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1 **RESPONSE TO REQUEST NO. 75:**

2 Paramount incorporates the General Objections as though fully set forth  
3 herein. Subject to and without waiving the foregoing objections or General  
4 Objections, Paramount responds as follows:

5 Deny.

6 **REQUEST NO. 76:**

7 Admit that You are unaware of any impact on new or potential markets for  
8 the Star Trek Copyrighted Works caused by the Axanar Works.

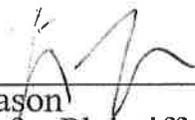
9 **RESPONSE TO REQUEST NO. 76:**

10 Paramount incorporates the General Objections as though fully set forth  
11 herein. Subject to and without waiving the foregoing objections or General  
12 Objections, Paramount responds as follows:

13 Deny.

14 Dated: October 24, 2016

LOEB & LOEB LLP  
JONATHAN ZAVIN  
DAVID GROSSMAN  
JENNIFER JASON

17 By:   
18 Jennifer Jason  
19 Attorneys for Plaintiffs  
20 PARAMOUNT PICTURES  
21 CORPORATION and CBS STUDIOS  
22 INC.

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**PROOF OF SERVICE**

I, Kathryn M. Arnote, the undersigned, declare that:

I am employed in the County of Los Angeles, State of California, over the age of 18, and not a party to this cause. My business address is 10100 Santa Monica Blvd., Suite 2200, Los Angeles, CA 90067.

On October 24, 2016, I served a true copy of the **PARAMOUNT PICTURES CORPORATION'S RESPONSES TO REQUESTS FOR ADMISSION, SET TWO** on the parties in this cause as follows:

(VIA U.S. MAIL) by placing the above named document in a sealed envelope addressed as set forth below, or on the attached service list and by then placing such sealed envelope for collection and mailing with the United States Postal Service in accordance with Loeb & Loeb LLP's ordinary business practices.

Erin R. Ranahan, Esq.  
Kelly N. Oki, Esq.  
Diana Hughes Leiden, Esq.  
Winston & Strawn LLP  
333 South Grand Avenue  
Los Angeles, CA 90071

I am readily familiar with Loeb & Loeb LLP's practice for collecting and processing correspondence for mailing with the United States Postal Service and Overnight Delivery Service. That practice includes the deposit of all correspondence with the United States Postal Service and/or Overnight Delivery Service the same day it is collected and processed.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 24, 2016, at Los Angeles, California.

  
Kathryn M. Arnote