

## **EXHIBIT 6 TO OKI DECLARATION**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

PARAMOUNT PICTURES CORPORATION, a	)	
Delaware corporation; and CBS	)	
STUDIOS INC., a Delaware	)	
corporation,	)	
	)	CASE NO.
Plaintiffs,	)	2:15-cv-09938-
	)	RGK-E
v.	)	
	)	
AXANAR PRODUCTIONS, INC., a	)	
California corporation; ALEC	)	
PETERS, an individual, and DOES	)	
1-20,	)	
	)	
Defendants.	)	
	)	

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CONFIDENTIAL  
VIDEOTAPED DEPOSITION OF BILL HUNT

Date and Time: Tuesday, October 25, 2016  
10:05 a.m. - 12:55 p.m.

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

Reporter: Christianne Lee Fong, CSR, CCRR  
Certificate No. 7559

Job No. 8144

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1 day of production for the forthcoming  
2 "Axanar" feature film. "Axanar," as  
3 most of you should know by now, is an  
4 independently produced Star Trek  
10:58 5 feature film. No fan film this: It's  
6 a fully professional but 100 percent  
7 nonprofit effort funded by Kickstarter  
8 backers, as CBS owns the franchise.  
9 But the goal is to create a dramatic  
10:58 10 film that absolutely fits in the Trek  
11 canon (midway between "Enterprise" and  
12 the original series), even if it can't  
13 officially be called canon.

14 You wrote this?

10:58 15 A I did, yeah.

16 Q What did you mean when you said "midway between  
17 'Enterprise' and the original series"?

18 A So, when I came on board, "Axanar" was meant to  
19 be a fan film that was set in a period -- an unexplored  
10:58 20 period between the television series "Enterprise," which  
21 was the last show that had been produced at that point,  
22 and the original series. There's a period of about  
23 90 years in Star Trek history that's just sort of wide  
24 open and hasn't been explored, and it was set during that  
10:59 25 period.

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1 I believe I wrote a couple of blog posts that day. But  
2 that's it.

3 Q There's a photo in the middle of this blog  
4 entry.

11:02 5 Can you identify the people in the photo?

6 A That would be Rob Burnett on the left, Alec  
7 Peters, Diana's cat Boomer, and that's me on the right.

8 Q And below the image it says (as read):

9 Sunday saw Bill Hunt and I work on  
11:02 10 the script. Bill Hunt, knowing that  
11 we have a deadline for a fully locked  
12 script in two weeks, knocked out a  
13 full revision of the first two acts in  
14 two days! And Rob was very happy with  
11:03 15 Bill's work (amazing what you can do  
16 when you are excited about a  
17 project!).

18 Do you recall when this was?

19 A I do not, but my expectation is that it would be  
11:03 20 sometime between June and August, because I believe  
21 the -- I believe the first locked draft was sometime in  
22 August.

23 Q Of 2015?

24 A Of 2015.

11:03 25 Q And what was the reason for a deadline?

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1           A     So, when you're working on a film, it's  
2 important to have a locked draft so that you can begin  
3 making -- building sets, begin making costumes and props,  
4 that sort of thing. And, as the script wasn't ready when  
11:03 5 I came on board, it wasn't ready for that process to  
6 continue.

7                     And because I think at that time we were  
8 expecting to shoot in -- I think October. I can't be  
9 positive, but I think there was a deadline -- they were  
11:04 10 ambitious in terms of when they wanted to shoot. They  
11 needed a locked draft.

12                     So I essentially wrote a first complete draft in  
13 about three weeks of the script.

14           Q     And when you did that, were you working off of  
11:04 15 an existing draft?

16           A     Yes. Yeah.

17           Q     And was that existing draft written, to your  
18 knowledge, by Mr. Gossett and Mr. Peters?

19           A     I don't know that Mr. Gossett was involved, but  
11:04 20 I know Alec was involved. My understanding was Christian  
21 was going to be involved, but I don't know to what extent  
22 he actually had been involved.

23           Q     And then, during the second half of 2015, how  
24 much work on a weekly basis did you do in terms of  
11:05 25 rewriting the script?

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1           A     It was fairly constant. From the time I got  
2 involved, it was very intense for three weeks till we got  
3 a locked draft, but it continued pretty much through the  
4 end of December.

11:05 5                     (Exhibit 172 marked.)

6 BY MR. GROSSMAN:

7           Q     Mr. Hunt, I've had marked as Exhibit 172 a  
8 one-page document marked at the bottom PL 903.

9                     Do you know what this is?

11:06 10          A     This would be a post on Facebook -- I'm not sure  
11 who posted it -- Alec maybe -- wherein we were  
12 celebrating the fact that we had a locked draft of the  
13 script. We had just completed a locked draft of the  
14 script.

11:06 15          Q     And this was in mid-August of 2015?

16          A     Yeah. I think it was probably right around  
17 August 10, if I'm not mistaken.

18          Q     But, as you said, after the script was, quote,  
19 locked, you continued to work on it and revise it  
11:06 20 throughout the rest of the year?

21          A     Yeah. This was my first draft. This was my  
22 first pass at the script. It was -- I had gotten to the  
23 point where we could lock it and sets could starting  
24 being made and all that process could continue. But it  
11:06 25 was by no means done.

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1           The first thing Rob and I did was go over it and  
2 think, what are the weaknesses of the script? What can  
3 we improve? What can we make better? And we began doing  
4 that, and we continued doing that until, I think, the end  
11:07 5 of December, when the lawsuit happened.

6           Q     Do you recall any characters that you either  
7 added or removed from the script once you started working  
8 on it?

9           A     Boy, I would have to see a list. But I  
11:07 10 certainly fleshed out many characters that were there. I  
11 did add -- I did add a number of characters. I'm trying  
12 to think of what they are. Various Klingon characters.  
13 The Federation president. A new admiral, Starfleet  
14 admiral. Let me see. Various officers aboard starships.

11:07 15           A character called Mor'o, who I think maybe had  
16 been mentioned in one -- one of the things about the  
17 original draft of the script is there were characters who  
18 were maybe mentioned in one scene but then never appeared  
19 again. And so I had to -- I had no idea who those were.

11:08 20           And in my first draft, I think I actually  
21 eliminated some characters that had been in that previous  
22 draft, and then Alec called my attention to the fact  
23 that, no, those characters are important, and I had to  
24 figure out why and try to weave them into the script.

11:08 25           Q     What was your level of understanding of Star

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1 Trek canon before you started working on the "Axanar"  
2 script?

3 A I've been a fan of Star Trek my entire life.

4 Q And did Mr. Peters give you any materials or  
11:08 5 direct you to any specific content in the Star Trek canon  
6 in connection with working on the script?

7 A No.

8 Q Did he tell you what any of the sources or  
9 inspirations were for the story that he was working on?

11:09 10 A Well, obviously, "Axanar", I knew, was based on  
11 a character that appeared in one original series episode.  
12 And he had also talked about -- I think there was a FASA  
13 game that had something to do with Axanar. There was  
14 some module that had to do with Axanar. And he talked a  
11:09 15 lot about an episode of M\*A\*S\*H that had inspired him to  
16 do "Prelude to Axanar." I think that was it.

17 Q Have you ever seen that FASA module?

18 A I have.

19 Q Where did you see it?

11:09 20 A I owned it when I was a teenager.

21 Q Did you have the Star Trek role-playing game?

22 A I had it, yes.

23 Q Did you actually play it?

24 A No. No. I had it because I liked the technical  
11:09 25 drawings and all that kind of thing.



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1           A     No. I know that there were -- I think there  
2 were various auctions that were still happening  
3 occasionally, but I don't -- beyond that, I don't know.  
4 My understanding is that he is a -- in his past business  
11:15 5 work has made a certain amount of money, and, beyond  
6 that, I have no idea.

7                     (Exhibit 173 marked.)

8 BY MR. GROSSMAN:

9           Q     Mr. Hunt, I've had marked as Exhibit 173 a  
11:15 10 script entitled "Axanar" that's Bates-numbered AX 26616,  
11 and it's about 113 pages.

12                     Do you recognize this document?

13           A     I do.

14           Q     And it says "Axanar, written by Alec Peters and  
11:16 15 Bill Hunt."

16           A     Yes.

17           Q     And at the bottom it says "Revision 7.7,  
18 November 26, 2015."

19                     Is it your understanding that this was the last  
11:16 20 full revision made to the "Axanar" script prior to the  
21 lawsuit?

22           A     There were a couple of additional drafts in  
23 December. I don't know that they were full drafts, but  
24 there were certainly changes that were made, significant  
11:16 25 changes that were made. This, I want to say, might have

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DECLARATION

I, BILL HUNT, say I have read the foregoing deposition and declare under penalty of perjury under the laws of the State of California:

That the foregoing is my deposition under oath;

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

That my answers as indicated are true and correct.

Executed at \_\_\_\_\_, California,  
this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
BILL HUNT