

**EXHIBIT DDD**

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.

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

22 Defendants.  
23

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

**CBS STUDIOS INC.'S  
RESPONSES TO  
INTERROGATORIES, SET ONE**

- 1 1. The Original Series
- 2 i. Episode 1: The Man Trap (PA 58-307)
- 3 2. The Next Generation
- 4 i. Encounter at Farpoint (Pilot) (PA 348 301)
- 5 3. Deep Space Nine
- 6 i. The Emissary, Part I (PA 661-369)
- 7 4. Voyager
- 8 i. Caretaker (PA 775-677 and PAu 1-801-831)
- 9 5. Enterprise
- 10 i. Enterprise – Episode #001 and #002 “Broken Bow” (PA 1-072-515)
- 11 6. Copyright Assignment from Paramount Pictures Corporation to CBS
- 12 Studios Inc. (V3542 D684- V3542 D690)

13 C. Books

- 14 1. Garth of Izar (Registration No. TX0005745716, owned by Paramount)
- 15 2. Strangers from the Sky (Registration No. TX0006429184, owned by CBS)
- 16 3. Infinity’s Prism (Registration No. TX0006872810, owned by CBS)
- 17 4. Star Trek Titan: Sword of Damocles (Registration No. TX0007050792,
- 18 owned by CBS)

19 D. Plaintiffs own numerous other copyrighted Star Trek works, including scores of  
20 books, artwork, and many other merchandising and promotional material, but  
21 only the works listed in A, B, and C above are the subject of this lawsuit.

22 **INTERROGATORY NO. 2:**

23 Identify every Star Trek Copyrighted Work that You claim has been infringed  
24 by *Prelude to Axanar*.

25 **RESPONSE TO INTERROGATORY NO. 2:**

26 CBS incorporates the General Objections as though fully set forth herein.  
27 CBS further objects to this Interrogatory on the grounds that it is overly broad and  
28 unduly burdensome. CBS further objects to this Interrogatory as premature in light

1 of the fact that discovery in this case is ongoing. Subject to and without waiving the  
2 foregoing objections or General Objections, CBS responds as follows:

- 3 1. *The Original Series* episode “Whom Gods Destroy” (Reg. No. RE-769-  
4 427, LP-44-729).
- 5 2. *The Original Series* episode “Patterns of Force” (Reg. No. RE-740-926,  
6 LP-44-375).
- 7 3. *The Original Series* episode “Errand of Mercy” (Reg. No. PA-58-283).
- 8 4. *The Original Series* episode “The Cage” (Reg. No. PA 314-430).
- 9 5. *The Original Series* episode “Where No Man Has Gone Before” (Reg.  
10 No. PA-58-303).
- 11 6. *The Original Series* episode “The Man Trap” (Reg. No. PA-58-307).
- 12 7. *The Original Series* episode “Amok Time” (Reg. No. PA-58-289).
- 13 8. *The Original Series* episode “Space Seed” (Reg. No. PA-58-280).
- 14 9. *The Original Series* episode “Balance of Terror” (Reg. No. PA-58-  
15 310).
- 16 10. *The Original Series* episodes “The Menagerie Parts I & II” (Reg. Nos.  
17 PA-58-294, PA-58-295).
- 18 11. *The Original Series* episode “Court Martial” (Reg. No. PA-58-293).
- 19 12. *The Original Series* episode “Journey to Babel” (Reg. No. RE-714-288,  
20 LP-50-341).
- 21 13. *The Original Series* episode “The Savage Curtain” (Reg. No. RE-769-  
22 425, LP-44-372).
- 23 14. *The Original Series* episode “Day of the Dove” (Reg. No. RE-740-931, LP-  
24 44-380).
- 25 15. *The Original Series* episode “Tomorrow is Yesterday” (Reg. No. PA-  
26 58-300).
- 27 16. *The Original Series* episode “The Doomsday Machine” (Reg. No. RE-  
28 714-257, LP-44-258).

- 1 17. *The Original Series* episode “Elaan of Troyius” (Reg. No. RE-740-930,  
2 LP-44-379).
- 3 18. *The Original Series* episode “The Lights of Zetar” (Reg. No. 769-428,  
4 LP-44-730).
- 5 19. *The Original Series* episode “The Alternative Factor” (Reg. No. PA-58-  
6 299).
- 7 20. *The Original Series* episode “And The Children Shall Lead” (Reg. No.  
8 RE-740-928, LP-44-377).
- 9 21. *The Original Series* episode “A Taste of Armageddon” (Reg. No. PA-  
10 58-302).
- 11 22. *Enterprise* episode “Bounty” (Reg. No. PA-1-205-603).
- 12 23. *Enterprise* episode “United” (Reg. No. PA-1-257-201).
- 13 24. *Enterprise* episode “The Expanse” (Reg. No. PA-1-205-604).
- 14 25. *Enterprise* episode “Unexpected.”
- 15 26. *Enterprise* episode “Fortunate Son.”
- 16 27. *Enterprise* episode “The Aenar.”
- 17 28. *Enterprise* episode “Babel One” (Reg. No. PA-1-257-199).
- 18 29. *Enterprise* episode “Broken Bow” (Reg. No. PA-1-072-515).
- 19 30. *Enterprise* episode “These Are The Voyages...” (Reg. No. PA-1-305-  
20 894).
- 21 31. *The Next Generation* episode “Sins of the Father” (Reg. No. PA-501-  
22 111).
- 23 32. *The Next Generation* episode “Samaritan Snare” (Reg. No. PA-430-  
24 993).
- 25 33. *The Next Generation* episode “The Naked Now” (Reg. No. PA-348-  
26 302).
- 27 34. *The Next Generation* episode “Conspiracy” (Reg. No. PA-415-572).
- 28 35. *Deep Space Nine* Series.

- 1 36. *Voyager Series.*
- 2 37. *Star Trek–The Motion Picture* (PA 58-633).
- 3 38. *Star Trek II–The Wrath of Khan* (PA 147-513).
- 4 39. *Star Trek III The Search for Spock* (PA 214-571).
- 5 40. *Star Trek IV: The Voyage Home* (PA 313-406).
- 6 41. *Star Trek V: The Final Frontier* (PA 436-660).
- 7 42. *Star Trek VI–The Undiscovered Country* (PA 558-359).
- 8 43. *Star Trek Generations* (PA 735-978).
- 9 44. *Star Trek: First Contact* (PA 832-616).
- 10 45. *Star Trek: Insurrection* (PA 949-613).
- 11 46. *Star Trek Nemesis* (PA 1-113-097).
- 12 47. *Star Trek* (PA 1-626-900).
- 13 48. Garth of Izar, the novel (Registration No. TX0005745716).
- 14 49. Strangers from the Sky, the novel (Registration No. TX0006429184).
- 15 50. Infinity’s Prism, the novel (Registration No. TX0006872810).
- 16 51. Star Trek Titan: Sword of Damocles, the novel (Registration No.
- 17 TX0007050792).

18  
19 **INTERROGATORY NO. 3:**

20 Identify every Star Trek Copyrighted Work that You claim has been infringed  
21 by the “Vulcan Scene.”

22 **RESPONSE TO INTERROGATORY NO. 3:**

23 CBS incorporates the General Objections as though fully set forth herein.  
24 CBS further objects to this Interrogatory on the grounds that it is overly broad and  
25 unduly burdensome. CBS further objects to this Interrogatory as premature in light  
26 of the fact that discovery in this case is ongoing. Subject to and without waiving the  
27 foregoing objections or General Objections, CBS responds as follows:

- 28 1. *The Original Series* episode “The Cage” (Reg. No. PA 314-430).

- 1           2.     *The Original Series* episode “Errand of Mercy” (Reg. No. PA-58-283).
- 2           3.     *The Original Series* episode “The Savage Curtain” (Reg. No. RE-769-
- 3     425, LP-44-372).
- 4           4.     *Enterprise* episode “Shockwave, Part II” (Reg. No. PA-1-134-204).
- 5           5.     *Enterprise* pilot episode “Broken Bow” (Reg. No. PA-1-072-515).
- 6           6.     *Enterprise* episode “The Expanse” (Reg. No. PA-1-205-604).
- 7           7.     *Enterprise* episode “Kir’shara” (Reg. No. PA-1-257-200).
- 8           8.     *Enterprise* episode “Two Days and Two Nights” (Reg. No. PA-1-102-
- 9     974).
- 10          9.     *Star Trek–The Motion Picture* (PA 58-633).
- 11          10.    *Star Trek III The Search for Spock* (PA 214-571).
- 12          11.    *Star Trek IV: The Voyage Home* (PA 313-406).
- 13          12.    *Star Trek* (PA 1-626-900).



15     **INTERROGATORY NO. 4:**

16             Identify every Star Trek Copyrighted Work that You claim has been infringed  
17 by the *Axanar* Motion Picture.

18     **RESPONSE TO INTERROGATORY NO. 4:**

19             CBS incorporates the General Objections as though fully set forth herein.  
20 CBS further objects to this Interrogatory on the grounds that it is overly broad and  
21 unduly burdensome. CBS further objects to this Interrogatory as premature in light  
22 of the fact that discovery in this case is ongoing. Subject to and without waiving the  
23 foregoing objections or General Objections, CBS responds as follows:

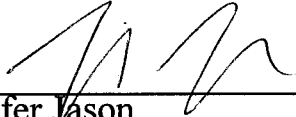
- 24           1.     *The Original Series* episode “The Cage” (Reg. No. PA 314-430).
- 25           2.     *The Original Series* episode “Errand of Mercy” (Reg. No. PA-58-283).
- 26           3.     *The Original Series* episode “The Savage Curtain” (Reg. No. RE-769-
- 27     425, LP-44-372).
- 28           4.     *Enterprise* episode “Shockwave, Part II” (Reg. No. PA-1-134-204).

1 with the proceeds raised off the *Axanar* Works, again, which infringe on the Star  
2 Trek Copyrighted Works.

3  
4  
5  
6 Dated: May 23, 2016

LOEB & LOEB LLP  
JONATHAN ZAVIN  
DAVID GROSSMAN  
JENNIFER JASON

7  
8  
9 By: \_\_\_\_\_

  
Jennifer Jason  
Attorneys for Plaintiffs  
PARAMOUNT PICTURES  
CORPORATION and CBS STUDIOS  
INC.

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28