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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,  
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19 Plaintiffs,

20 v.

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

23 Defendants.  
24  
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Case No.: 2:15-cv-09938-RGK-E

**PLAINTIFFS' UNOPPOSED  
APPLICATION FOR LEAVE TO  
FILE DOCUMENTS UNDER  
SEAL IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

Date: December 19, 2016  
Time: 9:00 a.m.  
Dept.: 850

Discovery Cutoff: November 2, 2016  
Pre-Trial Conference: January 9, 2017  
Trial: January 31, 2017

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1 By and through their undersigned counsel, and pursuant to Local Rule 79-  
2 5.2.2, plaintiffs Paramount Pictures Corporation and CBS Studios Inc. (collectively,  
3 “Plaintiffs”) will and hereby do apply for an order filing under seal the following  
4 documents on which Plaintiffs rely in support of their Opposition to Defendants’  
5 Motion for Summary Judgment:

- 6 1. **Exhibit A** to the Declaration of David Grossman (“Grossman  
7 Declaration”) (excerpts from the deposition transcripts of Alec Peters taken on  
8 October 19, 2016 and November 2, 2016);
- 9 2. **Exhibit B** to the Grossman Declaration (excerpts from the deposition  
10 transcript of Robert Meyer Burnett taken on October 11, 2016);
- 11 3. **Exhibit D** to the Grossman Declaration (excerpts from the deposition  
12 transcript of Diana Kingsbury taken on October 12, 2016);
- 13 4. **Exhibit K** to the Grossman Declaration (a document stating that  
14 *Prelude to Axanar* was viewed 2,540,365 times on YouTube);
- 15 5. **Exhibit N** to the Grossman Declaration (a brochure for a screening of  
16 *Prelude to Axanar*, which shows images of *Prelude to Axanar*);
- 17 6. **Exhibit P** to the Grossman Declaration (November 25, 2012 email  
18 exchange between Alec Peters and Christian Gossett);
- 19 7. **Exhibit V** to the Grossman Declaration (blueprints for the soundstage  
20 at Paramount Studios that was used for *Star Trek: The Original Series*);
- 21 8. **Exhibit W** to the Grossman Declaration (blueprints from the set of *Star*  
22 *Trek: Deep Space Nine*);
- 23 9. **Exhibit AA** to the Grossman Declaration (version 7.7 of the Axanar  
24 Script, dated November 26, 2015);
- 25 10. **Exhibit JJ** to the Grossman Declaration (Axanar press kit);
- 26 11. **Exhibit KK** to the Grossman Declaration (February 11, 2013 email  
27 from Alec Peters to Doug Drexler);
- 28 12. **Exhibit NN** to the Grossman Declaration (lease);

1           13.   **Exhibit PP** to the Grossman Declaration (Axanar marketing plan);

2           14.   **Exhibit SS** to the Grossman Declaration (financial summary);

3           15.   **Exhibit CCC** to the Grossman Declaration (excerpts from the  
4 deposition transcripts of John Van Citters taken on September 28, 2016 and Dan  
5 O'Rourke taken on September 30, 2016);

6           16.   **Exhibit FFF** to the Grossman Declaration (November 2015 email  
7 exchange);

8           17.   **Exhibit III** to the Grossman Declaration (March 2016 email exchange  
9 that includes Peters' Reddit post);

10          18.   **Exhibit KKK** to the Grossman Declaration (excerpts from the  
11 deposition transcript of J.J. Abrams taken on November 9, 2016);

12          19.   **Exhibit LLL** to the Grossman Declaration (excerpts from the  
13 deposition transcript of Justin Lin taken on November 7, 2016);

14          20.   Plaintiffs' unredacted Opposition to Motion for Summary Judgment,  
15 which quotes from and/or references the foregoing;

16          21.   The unredacted Grossman Declaration, which quotes from and/or  
17 references the foregoing;

18          22.   Plaintiffs' unredacted Statement of Genuine Issues in Opposition to  
19 Motion for Summary Judgment, which quotes from and/or references the foregoing;

20          23.   Plaintiffs' unredacted Objections to Defendants' Evidence Submitted in  
21 Support of Defendants' Motion for Summary Judgment.

22           Plaintiffs seek leave to file under seal the foregoing on the ground that  
23 defendants Axanar Production, Inc. and Alec Peters or Plaintiffs designated the  
24 foregoing "Confidential" or "Highly Confidential" pursuant to the terms of the  
25 Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

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1 Dated: November 28, 2016

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By: /s/ David Grossman

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