

# **EXHIBIT C**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

*Certified Copy*

PARAMOUNT PICTURES )  
CORPORATION, a Delaware )  
corporation; and CBS )  
STUDIOS, INC., a Delaware )  
corporation, )

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

) Plaintiffs, )

) vs. )

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

) Defendants. )  
)

VIDEOTAPED DEPOSITION OF CHRISTIAN GOSSETT

Date and Time: Saturday, October 22, 2016  
10:14 a.m. - 4:59 p.m.

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

Reporter: Vicki A. Saber, CSR, RPR, CRR, CCRR, CLR  
Certificate No. 6212

Job No. 8142

1 Q. What did he tell you about that?

2 A. He was hoping to flip Axanar from a nonunion  
3 shoot into a union shoot under the New Media rules as  
4 described by the Screen Actors Guild and other  
01:56 5 affiliated unions.

6 Q. Did he tell you why he wanted to do that?

7 A. Sorry for the pause. It's that a lot of the  
8 time with -- I'm trying to keep the answer simple. I  
9 would imagine he did. It was the way that he speaks.  
01:57 10 Whenever he had a proposal to shift or change or add  
11 something to the efforts, it was usually accompanied by  
12 a very, very excited reason why even if you didn't  
13 necessarily agree or see the need for that reason.

14 Q. But you don't recall any specific discussions  
01:57 15 about that concept?

16 A. He was excited about the idea of entertainment  
17 legitimacy.

18 Q. And you said the first -- the Prelude to  
19 Axanar was not a Guild production?

01:58 20 A. No.

21 (Exhibit 157 was marked for  
22 identification.)

23 BY MR. GROSSMAN:

24 Q. I've had marked as Exhibit 157 a two-page  
01:58 25 document marked 3372 at the bottom, and it's entitled

1 "Casting Announcement/Breakdown: Star Trek Axanar."

2 Do you recognize this document?

3 A. I don't.

4 Q. The document has a description of the film.

01:58 5 It identifies you as the director. And it lists the  
6 leading roles. Do you recognize the characters that are  
7 listed there?

8 A. I do.

9 Q. And were those characters that you and  
01:59 10 Mr. Peters had included in the draft script that you  
11 were working on?

12 A. Yes.

13 Q. If you look at the second page of this  
14 document it says, "Axanar" -- well, "Team Pitch." It  
01:59 15 says, "Axanar is a groundbreaking film meant to show  
16 that web features can be the equal of their TV/cinema  
17 counterparts. The crew is led by professionals with a  
18 large contingent of nonunion amateurs who have worked  
19 together for years on similar projects."

01:59 20 Did Mr. Peters ever describe to you the  
21 concept that he was interested in creating alternative  
22 ways for fans to view Star Trek content?

23 A. Repeatedly.

24 MS. COORG: Objection. Form.

02:00 25 THE WITNESS: Repeatedly.

1 BY MR. GROSSMAN:

2 Q. And what did he tell you about that?

3 A. He would excitedly discuss the possibility of  
4 creating more Star Trek as we created Prelude.

02:00 5 Q. And by "more Star Trek," do you mean more  
6 Star Trek films?

7 A. Yes, as well as other projects.

8 (Exhibit 158 was marked for  
9 identification.)

02:00 10 BY MR. GROSSMAN:

11 Q. Mr. Gossett, I've had marked as Exhibit 158 a  
12 two-page document that begins on the top with an email  
13 from you dated February 25, 2015 to Alec Peters copying  
14 Terry McIntosh.

02:01 15 Is this an email that you sent on or about  
16 that date?

17 A. Yes.

18 Q. And this email is responding to an email from  
19 Mr. Peters of the same date, and Mr. Peters says, "FYI.  
02:01 20 Lawyer is making up NDA now. Should have all legal  
21 documents by next week. In the meantime, you should  
22 feel free to send him an act at a time."

23 Who was the lawyer Mr. Peters was referring  
24 to?

02:01 25 A. I do not know.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

DECLARATION UNDER PENALTY OF PERJURY

I, CHRISTIAN GOSSETT, hereby declare under penalty of perjury that the foregoing is my deposition under oath;

Are the questions asked of me and my answers thereto;

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

In witness thereof, I hereby subscribe my name this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
CHRISTIAN GOSSETT

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

COUNTY OF LOS ANGELES, )  
STATE OF CALIFORNIA, )

I, Vicki A. Saber, Certified Shorthand Reporter licensed in the State of California, License No. 6212, hereby certify that the deponent was by me first duly sworn and the foregoing testimony was reported by me and was thereafter transcribed with Computer-Aided Transcription; that the foregoing is a full, complete, and true record of said proceeding.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing proceeding and caption named or in any way interested in the outcome of the cause in said caption. The dismantling, unsealing, or unbinding of the transcript will render the reporter's certificates null and void.

In witness whereof, I have hereunto set my hand this 29th day of October, 2016.

- Reading and Signing was requested.
- Reading and Signing was waived.
- Reading and Signing was not requested.



VICKI A. SABER, CSR NO. 6212, RPR, CRR, CCRR