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AXANAR PRODUCTIONS, INC.,
8 and ALEC PETERS

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11
12 PARAMOUNT PICTURES
CORPORATION, a Delaware
13 corporation; and CBS STUDIOS INC., a
Delaware corporation,

14 Plaintiffs,

15 vs.

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

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

Assigned to: Hon. R. Gary Klausner

**DECLARATION OF ERIN R.
RANAHAN IN SUPPORT OF
DEFENDANTS' REPLY IN
SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT**

Date: 12/19/16
Time: 9:00 a.m.
Place: Courtroom 850, 8th Floor
255 East Temple Street
Los Angeles, CA 90012
Judge: Hon. R. Gary Klausner

Original Complaint Filed: 12/29/15
First Amended Complaint Filed: 3/11/16

DECLARATION OF ERIN R. RANAHAN

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2 1. I am an attorney at Winston & Strawn LLP, counsel for Defendants
3 Axanar Productions, Inc. and Alec Peters in the above-entitled action. I have personal
4 knowledge of the matters set forth herein, and if called upon as a witness I could
5 competently testify thereto.

6 2. On June 21, 2016, during an in person meet and confer about certain
7 discovery disputes, I discussed with Plaintiffs' counsel whether Defendants needed to
8 produce all source material when access to their works was not disputed, given that
9 Plaintiffs could simply ask Mr. Peters during his deposition about what works he had
10 seen and accessed, rather than requiring him to produce back copies of the works he
11 purchased from Plaintiffs. This discussion did not relate to whether Plaintiffs would
12 produce in discovery the works they claimed were substantially similar to any of
13 Defendants' *Axanar* works. There was never an oral or written agreement whereby
14 Defendants agreed that Plaintiffs need not produce the works they claimed to be at
15 issue in this case.

16 3. Attached hereto as **Exhibit A**, which is true and correct email
17 correspondence between myself and Plaintiffs' Counsel regarding Plaintiffs' attempts
18 to schedule two expert depositions for the week of Thanksgiving on five business
19 days' notice. I indicated in this email that those dates were not feasible, but we could
20 schedule the depositions before oppositions to summary judgment were due if
21 Plaintiffs agreed to notice the hearings so that oppositions to summary judgment
22 would be due December 5 instead of November 28 (the day after Thanksgiving).
23 Plaintiffs rejected my request.

24 I declare under the penalty of perjury that the foregoing is true and correct.
25 Dated this 5th day of December, 2016 at Los Angeles, California.

26
27 /s/ Erin R. Ranahan

28 Erin R. Ranahan