

**CORRECTED EXHIBIT 2 TO THE
DECLARATION OF KELLY N. OKI IN
SUPPORT OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT**

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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

**PARAMOUNT PICTURES
CORPORATION'S AMENDED
RESPONSES TO
INTERROGATORIES, SET ONE
(NOS. 4, 5, 8 AND 9)**

1 PROPOUNDING PARTY: Defendants Axanar Productions, Inc. and Alec
2 Peters

3 RESPONDING PARTY: Plaintiff Paramount Pictures Corporation

4 SET NO.: ONE

5 Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure,
6 Plaintiff Paramount Pictures Corporation (“Paramount”), by and through its
7 attorneys, Loeb & Loeb LLP, hereby responds to Defendants’ First Set of
8 Interrogatories (the “Interrogatories”) to Paramount, as follows:

9 **RESPONSES TO INTERROGATORIES**

10 **INTERROGATORY NO. 4:**

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

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

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

- 20 1. *The Original Series* episode “Whom Gods Destroy” (Reg. No. RE-769-
- 21 427,LP-44-729).
- 22 2. *The Original Series* episode “The Cage” (Reg. No. PA 314-430).
- 23 3. *The Original Series* episode “Errand of Mercy” (Reg. No. PA-58-283).
- 24 4. *The Original Series* episode “The Savage Curtain” (Reg. No. RE-769-
- 25 425, LP-44-372).
- 26 5. *Enterprise* episode “Shockwave, Part II” (Reg. No. PA-1-134-204).
- 27 6. *Enterprise* pilot episode “Broken Bow” (Reg. No. PA-1-072-515).
- 28 7. *Enterprise* episode “The Expanse” (Reg. No. PA-1-205-604).

- 1 8. *Enterprise* episode “Kir’shara” (Reg. No. PA-1-257-200).
- 2 9. *Enterprise* episode “Two Days and Two Nights” (Reg. No. PA-1-102-
- 3 974).
- 4 10. *Star Trek–The Motion Picture* (PA 58-633).
- 5 11. *Star Trek III The Search for Spock* (PA 214-571).
- 6 12. *Star Trek IV: The Voyage Home* (PA 313-406).
- 7 13. *Star Trek* (PA 1-626-900).
- 8 14. *Star Trek: The Role Playing Game - The Four Years War*
- 9 15. *Star Trek: The Role Playing Game - Return to Axanar*

10 Additionally, Defendants have infringed Plaintiffs’ copyrighted characters,
 11 including Vulcans, Klingons, Starfleet Captains, Garth of Izar, Soval, Chang, the
 12 U.S.S. Enterprise, Klingon ships, and Federation ships.

13 **INTERROGATORY NO. 5:**

14 Identify every Star Trek Copyrighted Work that You claim has been infringed
 15 by any version of the *Axanar* Script.

16 **RESPONSE TO INTERROGATORY NO. 5:**

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

- 23 1. *The Original Series* episode “Whom Gods Destroy” (Reg. No. RE-769-
- 24 427,LP-44-729).
- 25 2. *The Original Series* episode “The Cage” (Reg. No. PA 314-430).
- 26 3. *The Original Series* episode “Errand of Mercy” (Reg. No. PA-58-283).
- 27 4. *The Original Series* episode “The Savage Curtain” (Reg. No. RE-769-
- 28 425, LP-44-372).

- 1 5. *Enterprise* episode “Shockwave, Part II” (Reg. No. PA-1-134-204).
- 2 6. *Enterprise* pilot episode “Broken Bow” (Reg. No. PA-1-072-515).
- 3 7. *Enterprise* episode “The Expanse” (Reg. No. PA-1-205-604).
- 4 8. *Enterprise* episode “Kir’shara” (Reg. No. PA-1-257-200).
- 5 9. *Enterprise* episode “Two Days and Two Nights” (Reg. No. PA-1-102-
- 6 974).
- 7 10. *Star Trek—The Motion Picture* (PA 58-633).
- 8 11. *Star Trek III The Search for Spock* (PA 214-571).
- 9 12. *Star Trek IV: The Voyage Home* (PA 313-406).
- 10 13. *Star Trek* (PA 1-626-900).
- 11 14. *Star Trek: The Role Playing Game - The Four Years War*
- 12 15. *Star Trek: The Role Playing Game - Return to Axanar*

13 In addition to the infringing elements already copied into the *Axanar Works*,
14 on information and belief, the Axanar Script also infringes:

- 15 a. *Star Trek VI—The Undiscovered Country* (PA 558-359).
- 16 b. *The Original Series* episode “Journey to Babel” (Reg. No. RE-
- 17 714-288, LP-50-341).
- 18 c. *Star Trek: The Next Generation* episode “Sarek” (Registration
- 19 No. PA-501-117).
- 20 d. *Star Trek: The Next Generation* episode “Unification, Part I”
- 21 (Registration No. PA-573-177).
- 22 e. *The Animated Series* episode “The Counter-Clock Incident.”
- 23 f. *Deep Space Nine Series*.

24 Additionally, Defendants have infringed Plaintiffs’ copyrighted characters,
25 including Vulcans, Klingons, Starfleet Captains, Garth of Izar, Soval, Chang, the
26 U.S.S. *Enterprise*, Klingon ships, and Federation ships.
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PROOF OF SERVICE

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I, Kathryn M. Arnote, the undersigned, declare that:

I am employed in the County of Los Angeles, State of California, over the age of 18, and not a party to this cause. My business address is 10100 Santa Monica Blvd., Suite 2200, Los Angeles, CA 90067.

On October 28, 2016, I caused a true copy of the **PARAMOUNT PICTURES CORPORATION'S AMENDED RESPONSES TO INTERROGATORIES, SET ONE (NOS. 4, 5, 8 AND 9)** to be served on the parties in this cause as follows:

(VIA MESSENGER SERVICE – PERSONAL DELIVERY) by giving the above-named document, for personal delivery on the party set forth below, to Nationwide Legal, Inc., a registered process service, having its principal place of business in the County of Los Angeles, State of California, and whose telephone number is (213) 249-9999, and whose business address is 1609 James M. Wood Blvd., Los Angeles, California 90015.

Erin R. Ranahan, Esq.
Kelly N. Oki, Esq.
Diana Hughes Leiden, Esq.
Winston & Strawn LLP
333 South Grand Avenue
Los Angeles, CA 90071

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on October 28, 2016, at Los Angeles, California.


Kathryn M. Arnote