

1 Erin R. Ranahan (SBN: 235286)
eranahan@winston.com
2 Diana Hughes Leiden (SBN: 267606)
dhleiden@winston.com
3 Kelly N. Oki (SBN: 304053)
koki@winston.com
4 WINSTON & STRAWN LLP
333 South Grand Avenue
5 Los Angeles, CA 90071
Telephone: (213) 615-1700
6 Facsimile: (213) 615-1750

7 Attorneys for Defendants,
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.
19

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

Assigned to: Hon. R. Gary Klausner

**DEFENDANTS AXANAR
PRODUCTIONS, INC., AND ALEC
PETERS' PROPOSED VOIR DIRE
QUESTIONS**

Pretrial Conference: January 9, 2017
Trial Date: January 31, 2017

DEFENDANTS’ PROPOSED VOIR DIRE QUESTIONS

1
2 Defendant Axanar Productions, Inc. and Alec Peters (“Defendants”) hereby
3 submit their proposed voir dire questions.

- 4 1. Are you familiar with Star Trek?
- 5 2. Do you consider yourself a fan of Star Trek?
- 6 3. Have you ever seen any Star Trek movies?
 - 7 a. Which ones?
 - 8 b. What is your opinion of them?
- 9 4. Have you ever seen any Star Trek television episodes?
 - 10 a. Which ones?
 - 11 b. What is your opinion of them?
- 12 5. Are you familiar with science fiction?
 - 13 a. Would you consider yourself a fan of science fiction?
 - 14 b. If so, are you a fan of any particular books, movies, or television
15 series?
- 16 6. Are you familiar with Alec Peters?
- 17 7. Have you ever heard of Axanar Productions?
- 18 8. Do you or any immediate family members work in the film or television
19 industry?
 - 20 a. If so, doing what?
 - 21 b. For what company?
- 22 9. Have you or any immediate family members ever worked for either of
23 the Plaintiffs?
 - 24 a. If so, when and doing what?
- 25 10. Have you or any immediate family members ever worked on a movie or
26 television show that involved either of the Plaintiffs?
 - 27 a. If so, what was the project and your role?
- 28 11. Do you know what “fan films” or “fan fiction” are?

- 1 a. What is your understanding of what a “fan film” is?
- 2 b. What is your understanding of what “fan fiction” is?
- 3 12. Have you ever watched any fan films or read any fan fiction?
- 4 13. Have you ever been involved in creating any fan films or fan fiction?
- 5 14. Have you ever heard of Prelude to Axanar or Axanar?
- 6 15. Have you ever watched Prelude to Axanar or the Vulcan Scene?
- 7 16. Have you ever given money to a “crowdfunding” website such as
- 8 Kickstarter or Indiegogo?
- 9 a. Which websites?
- 10 b. Which fundraising campaigns?
- 11 17. Do you have any prior knowledge of this lawsuit?
- 12 18. Are you a member of any Facebook group relating to Axanar or this
- 13 lawsuit?
- 14 a. Which ones?
- 15 19. Have you ever read any articles, news stories, or blog posts about this
- 16 lawsuit, Alec Peters, or Axanar Productions?
- 17 a. What was the content of the story or blog post?
- 18 20. Have you ever heard of, or been acquainted with, any of these parties or
- 19 their attorneys, or any persons employed in the same offices as the attorneys?
- 20 a. If so, who have you been acquainted with?
- 21 21. What is your highest level of education?
- 22 a. If you attended college, what did you study?
- 23 b. If you attended graduate school, what did you study?
- 24 22. Do you have any knowledge about or experience with copyrights?
- 25 23. Have you ever been involved in the creation of an artistic work (book,
- 26 film, music, painting, etc.) that was sold to others?
- 27 24. Have you ever felt that someone stole or misused an artistic work that
- 28 you created?

1 25. Have you ever registered a copyright?

2 26. Have you, a relative, or a close friend ever made a claim of copyright
3 infringement?

4 27. Have you, a relative, or a close friend ever been accused of infringing
5 another's copyright?

6 28. Do you know what "fair use" means in the context of copyright
7 infringement?

8 a. What is your understanding of "fair use?"

9 29. Have you, or anyone in your immediate family, attended law school or
10 had any other training in the law?

11 30. Do you have any specific feelings or opinions about lawsuits or lawyers,
12 either positive or negative?

13 31. Have you, or anyone in your immediate family, been a party (either as a
14 plaintiff or as a defendant) to any civil lawsuit?

15 a. If so, who (you or a family member) was a party to the case?

16 b. Were you (or your family member) a plaintiff or a defendant?

17 c. What was the nature of the case?

18 d. Was the case tried by a jury?

19 e. What was the outcome of the case?

20 f. Is there anything about that experience that would cause you to
21 question your ability to decide this case fairly and impartially, only
22 on the basis of the evidence and law presented during this trial?

23 32. Have you ever been a witness in any lawsuit?

24 a. If so, did you testify for the plaintiff or the defendant?

25 b. What was the nature of the case?

26 c. Is there anything about that experience that would cause you to
27 question your ability to decide this case fairly and impartially,
28 solely on the basis of the evidence presented during this trial?

1 Dated: December 30, 2016

WINSTON & STRAWN LLP

2
3 By: /s/ Erin R. Ranahan
4 Erin R. Ranahan
5 Diana Hughes Leiden
6 Kelly N. Oki
7 Attorneys for Defendants,
8 AXANAR PRODUCTIONS, INC.
9 and ALEC PETERS
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28