

1 LOEB & LOEB LLP  
DAVID GROSSMAN (SBN 211326)  
2 dgrossman@loeb.com  
JENNIFER JASON (SBN 274142)  
3 jjason@loeb.com  
10100 Santa Monica Blvd., Suite 2200  
4 Los Angeles, CA 90067  
Telephone: 310.282.2000  
5 Facsimile: 310.282.2200

6 LOEB & LOEB LLP  
JONATHAN ZAVIN (admitted *pro hac vice*)  
7 jzavin@loeb.com  
345 Park Avenue  
8 New York, NY 10154  
Telephone: 212.407.4000  
9 Facsimile: 212.407.4990

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

19 Plaintiffs,

20 v.

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

23 Defendants.  
24  
25

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

**DECLARATION OF DAVID  
GROSSMAN IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
RENEWED APPLICATION FOR  
LEAVE TO FILE BRIEF AS  
AMICUS CURIAE BY  
LANGUAGE CREATION  
SOCIETY AND REQUEST FOR  
SANCTIONS**

Trial: January 31, 2017

26  
27  
28

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  
26  
27  
28

**DECLARATION OF DAVID GROSSMAN**

I, DAVID GROSSMAN, declare as follows:

1. I am an attorney licensed to practice law in the State of California with the law firm of Loeb & Loeb LLP (“Loeb”), attorneys of record for Paramount Pictures Corporation and CBS Studios, Inc. (collectively, “Plaintiffs”) in the above-captioned matter. The following is of my own personal knowledge, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of an email that I received from LaTeigra C. Cahill on December 28, 2016, requesting a meet and confer between counsel for Plaintiffs and Marc Randazza about a renewed application for leave to file brief as amicus curiae by Language Creation Society (“LCS”). Less than 24 hours later, without waiting to hear back from us, and without even making a phone call, LCS filed its renewed application. The parties never met and conferred about this renewed application.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 30<sup>th</sup> day of December, 2016, at Los Angeles, California.

/s/ David Grossman  
David Grossman