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6 *Attorneys for Amicus*  
7 *Language Creation Society*

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

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

13 Plaintiffs,

14 v.

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

18 Defendants.

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

**DECLARATION OF LATEIGRA  
CAHILL IN SUPPORT OF  
REPLY IN SUPPORT OF  
RENEWED APPLICATION FOR  
LEAVE TO FILE BRIEF AS  
AMICUS CURIAE**

**Judge:** Hon. R. Gary Klausner

19 I, LaTeigra Cahill, declare:

20 1. I am over 18 years of age and have never been convicted of a crime  
21 involving fraud or dishonesty. I am employed as a law clerk for Randazza Legal  
22  
23

1 Group, PLLC. I have first-hand knowledge of the facts set forth herein, and if  
2 called as a witness, could and would testify competently thereto.

3 2. I make this declaration in support of *Amicus Curiae* Language  
4 Creation Society's Reply in Support of Renewed Application for Leave to File  
5 Brief as *Amicus Curiae*.

6 3. On December 28th at approximately 9:52 a.m. (PST), I called the  
7 Los Angeles office of Loeb & Loeb, a receptionist answered the phone and I asked  
8 to speak with Mr. Grossman.

9 4. The receptionist asked me what it was regarding and I said that I am a  
10 law clerk at Randazza Legal Group and I was calling in regards to seeking  
11 Mr. Grossman's position on an application Randazza Legal Group planned to  
12 renew into the Paramount vs. Axanar case.

13 5. The receptionist transferred me to Mr. Grossman's line and I left  
14 Mr. Grossman a voice message.

15 6. Immediately after leaving the voice message for Mr. Grossman,  
16 I called the New York Office of Loeb & Loeb.

17 7. Again, I talked to a receptionist, and I asked to speak to Mr. Zavin.

18 8. The receptionist asked what it was regarding and I said that I am a law  
19 clerk at Randazza Legal Group and I was calling in regards to seeking Mr. Zavin's  
20 position on renewing an Amicus application in the *Paramount v. Axanar* case.

21 9. The receptionist took the message and then attempted to transfer the  
22 call but Mr. Zavin did not pick up the phone.  
23

1           10. Since Mr. Grossman and Mr. Zavin did not attempt to call me back,  
2 I followed up the messages with an email a few hours later that included  
3 Mr. Grossman, Ms. Jason, and Mr. Zavin.

4           11. Around the same time, I sent a similar email to the Defendants'  
5 attorneys.

6           12. Within minutes after I sent the email, Defendants' attorneys  
7 responded to the email and I assisted them in scheduling a phone call with  
8 Mr. Randazza to discuss the issue.

9           13. On December 29, 2016 at approximately noon (PST) I joined the call  
10 and introduced myself to the Defendants' attorneys and explained that I was a law  
11 clerk and I would only be observing the phone call between them and  
12 Mr. Randazza.

13           14. I did not participate as a speaker on the phone call after I introduced  
14 myself.

15           15. The Defendants' attorneys asked Mr. Randazza if our firm had  
16 conferred with Plaintiffs yet.

17           16. Mr. Randazza mentioned my phone calls and emails, but noted that  
18 we had not heard anything back from them, speculating that they could have been  
19 out of the office due to the holidays.

20           17. Defendants' attorneys replied that Plaintiffs' attorneys had been  
21 emailing them "furiously" about the case.

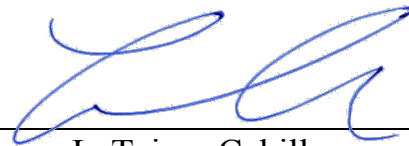
22           18. Defendants' attorneys also mentioned that this Court could issue a  
23 ruling any day.

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19. Based on the information the Defendants' attorneys provided about the emails Plaintiffs were sending them, while ignoring ours, and that the Court could rule any day, Mr. Randazza told me that our law firm would file the renewal without waiting.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 3, 2017.



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LaTeigra Cahill