

**EXHIBIT C TO
DECLARATION OF JONATHAN ZAVIN**

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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

20 v.

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

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

**PLAINTIFFS' EXPERT WITNESS
DISCLOSURE**

1 **PLEASE TAKE NOTICE** that Plaintiffs Paramount Pictures Corporation
2 and CBS Studios Inc. (collectively “Plaintiffs”) hereby submit their expert witness
3 disclosure pursuant to Fed. R. Civ. P. 26(a)(2)(B) (1).

4 John Van Citters may be called upon to testify regarding matters that would
5 be considered outside of the knowledge of laypersons who are not knowledgeable
6 about Star Trek works and/or who do not have the experience and knowledge
7 possessed by Mr. Van Citters regarding the history of the Star Trek entertainment
8 franchise.

9 The opinions that Mr. Van Citters will provide are that Defendants’ Axanar
10 Works are copied from Plaintiffs’ Star Trek Copyrighted Works, including
11 Klingons, Vulcans, the U.S.S. Enterprise, Garth of Izar, Soval the Vulcan
12 Ambassador, the planet Vulcan, and the various elements, including the settings,
13 characters, plots, sequences and themes described in the First Amended Complaint
14 in this action that were copied by Defendants to create their infringing works.

15 Mr. Van Citters was deposed in this action and may testify as to other
16 opinions that he provided at his deposition, to the extent not covered in the previous
17 paragraph.

18 Mr. Van Citters’ opinions will be based upon his background and experience
19 working for Plaintiffs Paramount Pictures Corporation and CBS Studios Inc., and
20 his personal knowledge in the Star Trek works.

21 Plaintiffs reserve the right to identify (1) additional expert witnesses based on
22 new information obtained during upcoming depositions and through outstanding
23 discovery; and/or (2) rebuttal expert witnesses. The foregoing shall not be
24 construed to limit the right of any other witness called by Plaintiffs to offer
25 testimony under Rules 702, 703 or 705 of the Federal Rules of Evidence to the
26 extent the Court may deem it appropriate.

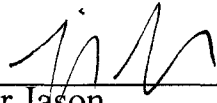
27 Plaintiffs further reserve the right to supplement this expert disclosure as may
28 be necessary in light of additional discovery that may be obtained in this matter.

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Dated: November 2, 2016

LOEB & LOEB LLP
JONATHAN ZAVIN
DAVID GROSSMAN
JENNIFER JASON

By: 

Jennifer Jason
Attorneys for Plaintiffs
PARAMOUNT PICTURES
CORPORATION and CBS STUDIOS
INC.

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PROOF OF SERVICE

I, Jacqueline Guay, 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.

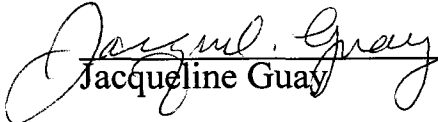
On November 2, 2016, I served a true copy of the **PLAINTIFFS' EXPERT WITNESS DISCLOSURE** on the parties in this cause as follows:

(VIA U.S. MAIL) by placing the above named document in a sealed envelope addressed as set forth below, or on the attached service list and by then placing such sealed envelope for collection and mailing with the United States Postal Service in accordance with Loeb & Loeb LLP's ordinary business practices.

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

I am readily familiar with Loeb & Loeb LLP's practice for collecting and processing correspondence for mailing with the United States Postal Service and Overnight Delivery Service. That practice includes the deposit of all correspondence with the United States Postal Service and/or Overnight Delivery Service the same day it is collected and processed.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on November 2, 2016, at Los Angeles, California.


Jacqueline Guay