

EXHIBIT EEE

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

**PARAMOUNT PICTURES
CORPORATION'S RESPONSES
TO INTERROGATORIES, SET
ONE**

1 B. Television Series (Plaintiffs own the copyrights for all episodes of each Star Trek
2 television series, and have identified the copyright registrations for the first
3 episode of each television series).

4 1. The Original Series

5 i. Episode 1: The Man Trap (PA 58-307)

6 2. The Next Generation

7 i. Encounter at Farpoint (Pilot) (PA 348 301)

8 3. Deep Space Nine

9 i. The Emissary, Part I (PA 661-369)

10 4. Voyager

11 i. Caretaker (PA 775-677 and PAu 1-801-831)

12 5. Enterprise

13 i. Enterprise – Episode #001 and #002 “Broken Bow” (PA 1-072-515)

14 6. Copyright Assignment from Paramount Pictures Corporation to CBS
15 Studios Inc. (V3542 D684- V3542 D690)

16 C. Books

17 1. Garth of Izar (Registration No. TX0005745716, owned by Paramount)

18 2. Strangers from the Sky (Registration No. TX0006429184, owned by CBS)

19 3. Infinity’s Prism (Registration No. TX0006872810, owned by CBS)

20 4. Star Trek Titan: Sword of Damocles (Registration No. TX0007050792,
21 owned by CBS)

22 D. Plaintiffs own numerous other copyrighted Star Trek works, including scores of
23 books, artwork, and many other merchandising and promotional material, but
24 only the works listed in A, B, and C above are the subject of this lawsuit.

25 **INTERROGATORY NO. 2:**

26 Identify every Star Trek Copyrighted Work that You claim has been infringed
27 by *Prelude to Axanar*.

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1 **RESPONSE TO INTERROGATORY NO. 2:**

2 Paramount incorporates the General Objections as though fully set forth
3 herein. Paramount further objects to this Interrogatory on the grounds that it is
4 overly broad and unduly burdensome. Paramount further objects to this
5 Interrogatory as premature in light of the fact that discovery in this case is ongoing.
6 Subject to and without waiving the foregoing objections or General Objections,
7 Paramount responds as follows:

- 8 1. *The Original Series* episode “Whom Gods Destroy” (Reg. No. RE-769-
9 427, LP-44-729).
- 10 2. *The Original Series* episode “Patterns of Force” (Reg. No. RE-740-926,
11 LP-44-375).
- 12 3. *The Original Series* episode “Errand of Mercy” (Reg. No. PA-58-283).
- 13 4. *The Original Series* episode “The Cage” (Reg. No. PA 314-430).
- 14 5. *The Original Series* episode “Where No Man Has Gone Before” (Reg.
15 No. PA-58-303).
- 16 6. *The Original Series* episode “The Man Trap” (Reg. No. PA-58-307).
- 17 7. *The Original Series* episode “Amok Time” (Reg. No. PA-58-289).
- 18 8. *The Original Series* episode “Space Seed” (Reg. No. PA-58-280).
- 19 9. *The Original Series* episode “Balance of Terror” (Reg. No. PA-58-
20 310).
- 21 10. *The Original Series* episodes “The Menagerie Parts I & II” (Reg. Nos.
22 PA-58-294, PA-58-295).
- 23 11. *The Original Series* episode “Court Martial” (Reg. No. PA-58-293).
- 24 12. *The Original Series* episode “Journey to Babel” (Reg. No. RE-714-288,
25 LP-50-341).
- 26 13. *The Original Series* episode “The Savage Curtain” (Reg. No. RE-769-
27 425, LP-44-372).

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- 1 14. *The Original Series* episode “Day of the Dove” (Reg. No. RE-740-931, LP-
- 2 44-380).
- 3 15. *The Original Series* episode “Tomorrow is Yesterday” (Reg. No. PA-
- 4 58-300).
- 5 16. *The Original Series* episode “The Doomsday Machine” (Reg. No. RE-
- 6 714-257, LP-44-258).
- 7 17. *The Original Series* episode “Elaan of Troyius” (Reg. No. RE-740-930,
- 8 LP-44-379).
- 9 18. *The Original Series* episode “The Lights of Zetar” (Reg. No. 769-428,
- 10 LP-44-730).
- 11 19. *The Original Series* episode “The Alternative Factor” (Reg. No. PA-58-
- 12 299).
- 13 20. *The Original Series* episode “And The Children Shall Lead” (Reg. No.
- 14 RE-740-928, LP-44-377).
- 15 21. *The Original Series* episode “A Taste of Armageddon” (Reg. No. PA-
- 16 58-302).
- 17 22. *Enterprise* episode “Bounty” (Reg. No. PA-1-205-603).
- 18 23. *Enterprise* episode “United” (Reg. No. PA-1-257-201).
- 19 24. *Enterprise* episode “The Expanse” (Reg. No. PA-1-205-604).
- 20 25. *Enterprise* episode “Unexpected.”
- 21 26. *Enterprise* episode “Fortunate Son.”
- 22 27. *Enterprise* episode “The Aenar.”
- 23 28. *Enterprise* episode “Babel One” (Reg. No. PA-1-257-199).
- 24 29. *Enterprise* episode “Broken Bow” (Reg. No. PA-1-072-515).
- 25 30. *Enterprise* episode “These Are The Voyages...” (Reg. No. PA-1-305-
- 26 894).
- 27 31. *The Next Generation* episode “Sins of the Father” (Reg. No. PA-501-
- 28 111).

- 1 32. *The Next Generation* episode “Samaritan Snare” (Reg. No. PA-430-
- 2 993).
- 3 33. *The Next Generation* episode “The Naked Now” (Reg. No. PA-348-
- 4 302).
- 5 34. *The Next Generation* episode “Conspiracy” (Reg. No. PA-415-572).
- 6 35. *Deep Space Nine* Series.
- 7 36. *Voyager* Series.
- 8 37. *Star Trek–The Motion Picture* (PA 58-633).
- 9 38. *Star Trek II–The Wrath of Khan* (PA 147-513).
- 10 39. *Star Trek III The Search for Spock* (PA 214-571).
- 11 40. *Star Trek IV: The Voyage Home* (PA 313-406).
- 12 41. *Star Trek V: The Final Frontier* (PA 436-660).
- 13 42. *Star Trek VI–The Undiscovered Country* (PA 558-359).
- 14 43. *Star Trek Generations* (PA 735-978).
- 15 44. *Star Trek: First Contact* (PA 832-616).
- 16 45. *Star Trek: Insurrection* (PA 949-613).
- 17 46. *Star Trek Nemesis* (PA 1-113-097).
- 18 47. *Star Trek* (PA 1-626-900).
- 19 48. *Garth of Izar*, the novel (Registration No. TX0005745716).
- 20 49. *Strangers from the Sky*, the novel (Registration No. TX0006429184).
- 21 50. *Infinity’s Prism*, the novel (Registration No. TX0006872810).
- 22 51. *Star Trek Titan: Sword of Damocles*, the novel (Registration No.
- 23 TX0007050792).

24 
25 **INTERROGATORY NO. 3:**

26 Identify every *Star Trek* Copyrighted Work that You claim has been infringed
27 by the “Vulcan Scene.”
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RESPONSE TO INTERROGATORY NO. 3:

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

1. *The Original Series* episode “The Cage” (Reg. No. PA 314-430).
2. *The Original Series* episode “Errand of Mercy” (Reg. No. PA-58-283).
3. *The Original Series* episode “The Savage Curtain” (Reg. No. RE-769-425, LP-44-372).
4. *Enterprise* episode “Shockwave, Part II” (Reg. No. PA-1-134-204).
5. *Enterprise* pilot episode “Broken Bow” (Reg. No. PA-1-072-515).
6. *Enterprise* episode “The Expanse” (Reg. No. PA-1-205-604).
7. *Enterprise* episode “Kir’shara” (Reg. No. PA-1-257-200).
8. *Enterprise* episode “Two Days and Two Nights” (Reg. No. PA-1-102-974).
9. *Star Trek–The Motion Picture* (PA 58-633).
10. *Star Trek III The Search for Spock* (PA 214-571).
11. *Star Trek IV: The Voyage Home* (PA 313-406).
12. *Star Trek* (PA 1-626-900).

INTERROGATORY NO. 4:

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

RESPONSE TO INTERROGATORY NO. 4:

Paramount incorporates the General Objections as though fully set forth herein. Paramount further objects to this Interrogatory on the grounds that it is

1 benefit from the preparation, duplication, and distribution of the infringing *Axanar*
2 Works.”

3 **RESPONSE TO INTERROGATORY NO. 11:**

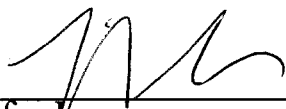
4 Paramount incorporates the General Objections as though fully set forth
5 herein. Paramount further objects to this Interrogatory on the grounds that it is
6 overly broad and unduly burdensome. Paramount further objects to this
7 Interrogatory as premature in light of the fact that discovery in this case is ongoing.
8 Paramount further objects to this Interrogatory on the ground that it improperly calls
9 for a legal conclusion. Paramount further objects to this Interrogatory on the ground
10 that it is subject to expert testimony.

11 On information and belief, Mr. Peters paid himself more than \$38,000 with
12 funds that were raised in connection with the *Axanar* Works, which infringe on the
13 Star Trek Copyrighted Works. In addition, Defendants built a commercial studio
14 with the proceeds raised off the *Axanar* Works, again, which infringe on the Star
15 Trek Copyrighted Works.

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Dated: May 23, 2016

LOEB & LOEB LLP
JONATHAN ZAVIN
DAVID GROSSMAN
JENNIFER JASON

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