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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*

**DECLARATION OF ERIN R.  
RANAHAN IN OPPOSITION TO  
PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT**

Date: 12/19/16  
Time: 9:00 a.m.  
Place: Courtroom 850, 8<sup>th</sup> Floor  
255 East Temple Street  
Los Angeles, CA 90012  
Judge: Hon. R. Gary Klausner

Original Complaint Filed: 12/29/15  
First Amended Complaint Filed: 3/11/16

**DECLARATION OF ERIN R. RANAHAH**

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2 1. I am an attorney at Winston & Strawn LLP, counsel for Defendants  
3 Axanar Productions, Inc. and Alec Peters in the above-entitled action. I have personal  
4 knowledge of the matters set forth herein, and if called upon as a witness I could  
5 competently testify thereto.

6 2. **Exhibits A and B** to my declaration are true and correct copies of  
7 Plaintiffs’ Responses to Defendants’ Requests for Production, Set One, dated May 23,  
8 2016.

9 3. **Exhibit C** to my declaration is a true and correct copy of excerpted pages  
10 from the transcript of John Van Citters, taken on September 28, 2016.

11 4. **Exhibit D** to my declaration is a true and correct copy of excerpted pages  
12 from the transcript of the deposition of Robert Meyer Burnett, taken on October 11,  
13 2016.

14 5. **Exhibit E** to my declaration is a true and correct copy of excerpted pages  
15 from the transcript of the deposition of Christian Gossett, taken on October 22, 2016.

16 6. **Exhibit F** to my declaration is a true and correct copy of excerpted pages  
17 from the transcript of Daniel O’Rourke, taken on September 30, 2016.

18 7. Plaintiffs’ counsel did not meet and confer with us pursuant to Local  
19 Rule 7-3 with respect to seeking injunctive relief in connection with their motion for  
20 partial summary judgment. A true and correct copy of my correspondence with  
21 Plaintiffs’ counsel regarding the matter is attached hereto as **Exhibit G**.

22 8. **Exhibit H** to my declaration is a true and correct copy of Wikipedia  
23 definition of “mockumentary” as of November 28, 2016.

24 I declare under the penalty of perjury that the foregoing is true and correct.  
25 Dated this 28th day of November, 2016 at Los Angeles, California.

26  
27 /s/ Erin R. Ranahan

28 Erin R. Ranahan