

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.  
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13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA  
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16 PARAMOUNT PICTURES  
CORPORATION, a Delaware  
17 corporation; and CBS STUDIOS INC.,  
a Delaware corporation,

18 Plaintiffs,

19 v.

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

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

**PLAINTIFFS' UNOPPOSED  
APPLICATION FOR LEAVE TO  
FILE DOCUMENTS UNDER  
SEAL RE: MOTIONS IN LIMINE**

Discovery Cutoff: November 2, 2016  
Pre-Trial Conference: January 9, 2017  
Trial: January 31, 2017

1 By and through their undersigned counsel, and pursuant to Local Rule 79-  
2 5.2.2, plaintiffs Paramount Pictures Corporation and CBS Studios Inc. (collectively,  
3 “Plaintiffs”) will and hereby do apply for an order filing under seal the following  
4 documents in regard to Plaintiffs’ Motions in Limine:

- 5 1. Unredacted Motion in Limine (“MIL”) No. 1.
- 6 2. Unredacted Declaration of Jennifer Jason in Support of MIL No.  
7 1.
- 8 3. **Exhibit A** to Declaration in Support of MIL No. 1 (excerpts  
9 from the deposition transcripts of Alec Peters taken on October 19, 2016 and  
10 November 2, 2016).
- 11 4. **Exhibit B** to Declaration in Support of MIL No. 1 (financial  
12 statement).
- 13 5. **Exhibit C** to the Declaration in Support of MIL No. 1 (altered  
14 financial statement).
- 15 6. Unredacted MIL No. 2.
- 16 7. Unredacted Declaration of Jennifer Jason in Support of MIL No.  
17 2.
- 18 8. **Exhibit A** to Declaration in Support of MIL No. 2 (excerpts  
19 from the deposition transcript of Alec Peters taken on October 19, 2016).
- 20 9. **Exhibit C** to Declaration in Support of MIL No. 2 (Axanar  
21 Script Version 7.7).
- 22 10. **Exhibit D** to Declaration in Support of MIL No. 2 (Axanar  
23 Script dated July 1, 2016).
- 24 11. Unredacted MIL No. 3.
- 25 12. Unredacted Declaration of Jennifer Jason in Support of MIL No.  
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- 1           13.    **Exhibit A** to Declaration in Support of MIL No. 3 (excerpts
- 2 from the deposition transcript of J.J. Abrams taken on November 9, 2016 and from
- 3 the deposition transcript of Justin Lin taken on November 7, 2016).
- 4           14.    **Exhibit B** to Declaration in Support of MIL No. 3 (excerpts from
- 5 the deposition transcript of J.J. Abrams taken on November 9, 2016).
- 6           15.    **Exhibit C** to Declaration in Support of MIL No. 3 (excerpts
- 7 from the deposition transcript of Justin Lin taken on November 7, 2016).
- 8           16.    **Exhibit C** to Declaration in Support of MIL No. 6 (internal CBS
- 9 email discussing fan films).
- 10          17.    Unredacted Declaration of Jennifer Jason in Support of MIL No.
- 11 7.
- 12          18.    **Exhibit A** to Declaration in Support of MIL No. 7 (excerpts
- 13 from the deposition transcript of Alec Peters taken on November 2, 2016).
- 14          19.    Unredacted MIL No. 9.
- 15          20.    Unredacted Declaration of Jennifer Jason in Support of MIL No.
- 16 9.
- 17          21.    **Exhibit A** to Declaration in Support of MIL No. 9 (excerpts
- 18 from the deposition transcript of Alec Peters taken on October 19, 2016).
- 19          22.    **Exhibit B** to Declaration in Support of MIL No. 9 (unredacted
- 20 Christian Tregillis report).
- 21          23.    **Exhibit H** to Declaration in Support of MIL No. 9 (Peters email
- 22 exchange).
- 23          24.    Unredacted MIL No. 10.
- 24          25.    Unredacted Declaration of Jennifer Jason in Support of MIL No.
- 25 10.
- 26          26.    **Exhibit D** to Declaration in Support of MIL No. 10 (excerpts
- 27 from the deposition transcript of Alec Peters taken on October 19, 2016).
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27. **Exhibit J** to Declaration in Support of MIL No. 10 (excerpts from the deposition transcript of Robert Meyer Burnett taken on October 11, 2016).

Plaintiffs seek leave to file under seal the foregoing on the grounds that Plaintiffs or defendants Axanar Production, Inc. and Alec Peters designated the foregoing “Confidential” or “Highly Confidential” pursuant to the terms of the Stipulated Protective Order entered by this Court on July 12, 2016. See Dkt. 53.

Dated: December 16, 2016

LOEB & LOEB LLP  
JONATHAN ZAVIN  
DAVID GROSSMAN  
JENNIFER JASON

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