

# **EXHIBIT “A”**

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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,  
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19 Plaintiffs,

20 v.

21 AXANAR PRODUCTIONS, INC., a  
California corporation; ALEC PETERS,  
an individual, and DOES 1-20,  
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23 Defendants.  
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Case No.: 2:15-cv-09938-RGK-E

**JOINT EXHIBIT LIST**

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

1 Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A)(iii) and Local Rule  
 2 16-6.1 of the Central District of California, Plaintiffs Paramount Pictures  
 3 Corporation and CBS Studios, Inc. (collectively, “Plaintiffs”) and Defendants Alec  
 4 Peters and Axanar Productions, Inc. (collectively, “Defendants”), hereby submit the  
 5 following list of exhibits that they intend to offer at trial:

Ex. No.	Description	Objections	Date Id.	Date Adm.
3	Depo. Ex. 3 - 6/2/10 Email from Alec Peters to Ian Spelling cc: John Van Citters re StarTrek.com. PL0006459 - PL0006460.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). Documents relating to Peters’ work on Star Trek props are not relevant to this case. Plaintiffs have not filed suit based on such work.		
4	Depo. Ex. 4 - 7/28/10 Email from Bill Burke to Kristen Gerring re: FW: ST people and contact info. PL0007878 - PL0007880. CONFIDENTIAL	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). An internal CBS email containing a list of individuals who have worked on Star Trek and other films in the context of brainstorming ideas for restarting Startrek.com as a website is not relevant to this case.		
9	Depo. Ex. 9 - 8/24/15 - Email from John Van Citters to Bill Burke, Veronica Hart re Contributors to unlicensed films. PL0006941. CONFIDENTIAL	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). An internal CBS email discussing people who work for Axanar who are also contributing to CBS’ licensed works is not relevant to this case. Plaintiffs did not file suit against these individuals and they are not witnesses in this case.		
10	Depo. Ex. 10 - 9/4/15 Email from Tobias Richter to John Van Citters cc: Andreas Mergenthaler re German voyager cover. PL0012373 - PL0012377. CONFIDENTIAL	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). An email between a CBS employee and a visual effects professional has no relevance to this case.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
11	Depo. Ex. 11 - 9/1/16 Certificate of Recordation. PL0000045-76.			
12	Depo. Ex. 12 - Copyright registrations: The Man Trap 2/7/86 (Star Trek Series); Encounter at Farpoint (Star Trek - the Next Generation Series) 1/7/88; The Emissary, Part 1 (Star Trek - Deep space Nine Series) 10/10/93; Caretaker (Star Trek Voyager TV Series) 3/25/96; and Star Trek: Voyager (Script) 10/17/94. PL0000035-44.			
13	Depo. Ex. 13 - 8/27/15 - Email from Alec Peters to John Van Citters; Bill Burke cc: Elizabeth Kalodner; Mallory Levitt re Axanar. PL0012412.			
14	Depo. Ex. 14 - 5/6/15 - Email from John Van Citters to Bill Burke re fan bridges. PL0006993. CONFIDENTIAL	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). Internal CBS emails relating to other films, and particularly the guidelines set by other film studios, has no relevance to this case. Defendants intend to submit this exhibit in order to argue that the Axanar film is a fan film. While Defendants label the Axanar Works as a “fan film,” no court has ever held that a “fan film” (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis. Moreover, whether Plaintiffs have sued other “fan film” creators is legally irrelevant as well.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
15	Depo. Ex. 15 - 4/8/15 - Email from John Van Citters to Liz Kalodner cc: Veronica Hart; Bill Burke re Alec Peters. PL0012220. CONFIDENTIAL			
16	Depo. Ex. 16 - STAR TREK Facebook Fan Page	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). The Star Trek fan films guidelines are not relevant. Defendants intend to submit this exhibit in order to argue that the Axanar film is a fan film. While Defendants label the Axanar Works as a “fan film,” no court has ever held that a “fan film” (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis. Moreover, whether Plaintiffs have sued other “fan film” creators is legally irrelevant as well.		
17	Depo. Ex. 17 - Star Trek Fan Film Guidelines Announced	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). The Star Trek fan films guidelines are not relevant. Defendants intend to submit this exhibit in order to argue that the Axanar film is a fan film. While Defendants label the Axanar Works as a “fan film,” no court has ever held that a “fan film” (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis. Moreover, whether Plaintiffs have sued other “fan film” creators is legally irrelevant as well.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
18	Depo. Ex. 18 - [Dkt 48] 5/23/16 Answer of Defendants Axanar Productions, Inc., and Alec Peters to Plaintiffs' First Amended Complaint; Counterclaim for Declaratory Relief; Demand for Jury Trial			
24	Depo. Ex. 24 - 3/24/65 Binding agreement between Desilu Productions and Norway Corporation with services to Gene Roddenberry. PL0001475-1486. CONFIDENTIAL			
25	Depo. Ex. 25 - 8/24/67 Letter from Sherwin Samuels to Eugen Frank. PL0012673-12692. CONFIDENTIAL			
26	Depo. Ex. 26 - 5/27/76 Memorandum of Agreement between Paramount Pictures Corporation ("Paramount"), on one hand and The Norway Corporation ("Norway") and Lincoln Enterprises, Inc. ("Lincoln") on the other hand. PL0001420-1451. CONFIDENTIAL			
27	Depo. Ex. 27 - 2/18/97 Certificate of Recordation from Norway Corporation to Paramount Pictures Corporation. PL0001041-1050. CONFIDENTIAL			
28	Depo. Ex. 28 - 12/17/07 Star Trek Agreement between Paramount Pictures Corporation and Norway Corporation. PL0000941-992. CONFIDENTIAL			

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Ex. No.	Description	Objections	Date Id.	Date Adm.
29	Depo. Ex. 29 - 2/18/97 Certificate of Recordation from Majel Roddenberry, Eugene Roddenberry, Jr., & Darleen Roddenberry to Paramount Pictures Corporation. PL0001052-1065. CONFIDENTIAL			
30	Depo. Ex. 30 - 5/3/90 Certificate of Recordation Assignment to Paramount Pictures Corporation. PL0001295-1297. CONFIDENTIAL			
31	Depo. Ex. 31 - 12/21/05 Assignment & License of rights to certain properties from Paramount Pictures Corporation to CBS between Paramount Pictures Corporation and subsidiaries and CBS Studios Inc. PL0000998-1033. CONFIDENTIAL			
41	Depo. Ex. 41 - 8/26/15 Robert Meyer Burnett comment re "How \$1.1 Million 'Star Trek' Fan Movie Has Escaped Studio Shutdown (So Far)", The Wrap, <a href="http://www.thewrap.com/how-1-1-million-star-trek-fan-movie-has-escaped-studio-shutdown-so-far">www.thewrap.com/how-1-1-million-star-trek-fan-movie-has-escaped-studio-shutdown-so-far</a> . PL0005997-6007.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). The text is unreadable, and in any event, Mr. Burnett's comments are not probative of any relevant matters.		
42	Depo. Ex. 42 - Prelude to Axanar Booklet Back Page Front Cover - Booket Inside. AX003153. CONFIDENTIAL			
43	Depo. Ex. 43 - Prelude to Axanar Booklet Back Page , Front Page, Booklet Inside. AX003152.			

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Ex. No.	Description	Objections	Date Id.	Date Adm.
	CONFIDENTIAL			
44	Depo. Ex. 44 - 11/3/15 Email string between Bill Hunt and Alec Peters. AX030004-30007. CONFIDENTIAL			
45	Depo. Ex. 45 - Credit list. AX000203-209. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, or the careers or experience of the people who work on them, have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' Motion in Limine ("MIL") No. 9.		
46	Depo. Ex. 46 - 3/26/14 Deal Memo. AX003426. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, or the careers or experience of the people who work on them, have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
47	Depo. Ex. 47 - 5/30/14 Star Trek: Prelude to Axanar by Axanar Productions -- Kickstarter, Kickstarter, <a href="https://www.kickstarter.com/projects/194429923/star-trek-prelude-to-axanar">https://www.kickstarter.com/projects/194429923/star-trek-prelude-to-axanar</a> (last visited 5/30/14). PL0005894-5916.			



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Ex. No.	Description	Objections	Date Id.	Date Adm.
48	Depo. Ex. 48 - 7/15/15 Star Trek: Axanar, Indiegogo <a href="https://www.indiegogo.com/projects/star-trek-axanar#/story">https://www.indiegogo.com/projects/star-trek-axanar#/story</a> (last visited 7/15/15). PL0005854-5888.			
49	Depo. Ex. 49 - 4/12/15 Draft Marketing Plan. AX003784-3790. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Fed. R. Evid. 602 (lacks foundation as the author of the draft marketing plan, which was never used, was not deposited); FRE 802 (hearsay). This draft marketing plan did not relate to the Axanar Works; it relates to potential plans unrelated to the Axanar Works, and was prepared by someone that was never deposited in this action. See ECF No. 135, Defendants' MIL No. 7.		
50	Depo. Ex. 50 - 1/11/15 Blog post, Ares Studios Launches!, Axanar Productions, <a href="http://www.axanarproductions.com/ares-studios-launches">http://www.axanarproductions.com/ares-studios-launches</a> . PL0005842-5846.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations, with respect to a work that this lawsuit has halted, including on a studio, with respect to a work that this lawsuit halted, has no relevance to copyright infringement. See ECF No. 135, Defendants' MIL No. 7. Plaintiffs are not donors to Defendants' crowdfunding campaign, and thus have no standing to object to how Defendants' allegedly spent the money raised. Id.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
51	Depo. Ex. 51 - 7/5/15 Squadron Strike: Axanar In Development, Ad Astra Games, www.adastragames.com. PL0006013-6023.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants' MIL No. 7. Plaintiffs are not donors to Defendants' crowdfunding campaign, and thus have no standing to object to how Defendants' allegedly spent the money raised. Id.		
52	Depo. Ex. 52 - 6/30/15 Axanar Budget. PL0006010-6012.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants planned to or did spend money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants' MIL No. 7. Plaintiffs are not donors to Defendants' crowdfunding campaign, and thus have no standing to object to how Defendants' allegedly spent the money raised. Id.		
53	Depo. Ex. 53 - 1/6/15 Robert Meyer Burnett posts photo to Facebook	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Personal social media post, through which Mr. Burnett reposted a photo someone else originally posted regarding J.J. Abrams treatment of R2-D2 in the Star Wars movie, is not relevant to Plaintiffs' copyright claims in this lawsuit.		
54	Depo. Ex. 54 - 10/18/15 Robert Meyer Burnett Facebook posts	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		probative, waste of time). Personal social media post concerning Mr. Burnett’s excitement about Star Wars’, The Force Awakens, and comments on J. J. Abrams role in prior Star Trek movies, is not relevant to Plaintiffs’ copyright claims.		
55	Depo. Ex. 55 - 6/2/14 Robert Meyer Burnett Tweet	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Personal social media post concerning is not relevant to Plaintiffs’ copyright claims.		
56	Depo. Ex. 56 - 11/28/13 Robert Meyer Burnett Tweet	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Personal social media post concerning is not relevant to Plaintiffs’ copyright claims.		
57	Depo. Ex. 57 - 2/6/13 Robert Meyer Burnett Tweets	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Personal social media post concerning J.J. Abrams is not relevant to Plaintiffs’ copyright claims.		
59	Depo. Ex. 59 - 3/5/15 Studio Floor Going in!, Axanar Productions <a href="http://www.axanarproductions.com/studio-floor-going-in">http://www.axanarproductions.com/studio-floor-going-in</a> . PL0005847-5853.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations, including with respect to the studio rented to create the film, has no relevance to copyright infringement. See ECF No. 135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		campaign, and thus have no standing to object to how Defendants' allegedly spent the money raised. Id. Allowing Plaintiffs to continue to scrutinize the expenditures for a work that their lawsuit halted, and the financials of renting a studio, would provide no probative value. Id.		
60	Depo. Ex. 60- 11/3/15 Email string between Robert Meyer Burnett and Alec Peters. AX030011-30012. CONFIDENTIAL			
61	Depo. Ex. 61 - 5/9/16 Email from Alec Peters to Diana Kingsbury, et al. AX030316-30317. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). This internal email regarding a staff meeting has no bearing on any issue in this action		
62	Depo. Ex. 62 - 7/26/14 Prelude to Axanar First Invitational Screening Comic-Con International San Diego. AX005089-5104. CONFIDENTIAL			
63	Depo. Ex. 63 - 3/3/15 Entertainment Partners Production Setup Order. AX000396-402. HIGHLY CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants' MIL No. 7. Plaintiffs are not donors to Defendants' crowdfunding campaign, and thus have no standing to object to how Defendants' allegedly spent the money raised. Id.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
64	Depo. Ex. 64 - 12/11/14 Email string between Ken <ken@burbankprint.com> and Diana Kingsbury. AX030336-30337. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants' MIL No. 7. Plaintiffs are not donors to Defendants' crowdfunding campaign, and thus have no standing to object to how Defendants' allegedly spent the money raised. Id.		
65	Depo. Ex. 65 - 6/3/15 Axanar Productions organizational chart. AX000200.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
66	Depo. Ex. 66 - 8/31/15 Photo of Alec Peters. PL0000859.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
67	Depo. Ex. 67 - 7/6/14 Photo of Diana Kingsbury and Alec Peters. AX005088. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendant Peters' personal relationship with Diana Kingsbury has no relevance to Plaintiffs' copyright claims. See ECF No. 133, Defendants' MIL No. 5.		
68	Depo. Ex. 68 - 7/13/15 Itinerary for Alec Peters Los Angeles, CA / Calgary, Canada trip. AX003508-3509. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants' MIL No. 7. Plaintiffs are not donors to Defendants' crowdfunding campaign, and thus have no standing to object to how Defendants' allegedly spent the money raised. Id.		
69	Depo. Ex. 69 - 2/25/15 Email from Diana Kingsbury to Alec Peters, et al. AX029176. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work has any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
71	Depo. Ex. 71 - 5/7/15 Email string between Horace Austin and Diana Kingsbury. AX029713-29714. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how Defendants’ allegedly spent the money raised. Id.		
73	Depo. Ex. 73 - 9/7/16 Axanar balance sheets for years 2014 to 2016. AX030915-31129. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how Defendants’ allegedly spent the money raised. Id.		
74	Depo. Ex. 74 - 7/15 The Axanar Annual Report Revised. PL0000825-847.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how Defendants’ allegedly spent the money raised. Id.		
75	Depo. Ex. 75 - 12/22/15 Email string between Diana Kingsbury and Matthew Kalvin. AX030665-30666. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how Defendants’ allegedly spent the money raised. Id.		
76	Depo. Ex. 76 - 12/5/15 Email string between Kate Bergh, Diana Kingsbury et al. AX029766-29767. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how Defendants’ allegedly spent the money raised. Id.		
77	Depo. Ex. 77 - 3/17/16 Email string between Diana Kingsbury and Alec Peters. AX030869-30870. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how Defendants’ allegedly spent the money raised. Id.		
78	Depo. Ex. 78 - 5/13/16 Email string between Marc Hofstatter and Diana Kingsbury. AX030292-30293. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendants’ crowdfunding efforts, and any disputes related to those efforts, are completely irrelevant to Plaintiffs’ claims.		



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Ex. No.	Description	Objections	Date Id.	Date Adm.
		See ECF No. 133, Defendants' MIL No. 5.		
80	Depo. Ex. 80 - 4/5/16 Alec Peters Facebook post. PL0000899	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Email updating his fans concerning instant lawsuit is not relevant to Plaintiffs' copyright claims.		
82	Depo. Ex. 82 - 7/14/16 - Startrek.com Printout entitled The Original Series Set Tour to Open	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 602 (Lacks foundation). FRE 802 (Hearsay). An article about a licensed tour of the set of The Original Series (the first Star Trek television series) is not relevant to this case. Defendants' Axanar Works were not licensed, nor do they contend that they were licensed.		
83	Depo. Ex. 83 - 1/23/08 - Email chain from Liz Kalodner to John Van Citters re Star Trek. PL0006230 - PL0006231.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). An internal CBS email discussing Mr. Peters' Star Trek prop business has no relevance to this case.		
84	Depo. Ex. 84 - 1/20/10 - Email string from Elizabeth Kalodner to Craig Freeman re FW: Star Trek Experience Inventory. PL0007983 - PL0007985.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). An email chain discussing Star Trek props has no relevance to this case.		
85	Depo. Ex. 85 - 1/14/10 Email string from John Van Citters to Elizabeth Kalodner; Veronica Hart re Power Point. PL0000754. CONFIDENTIAL	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). An internal CBS email about another film that Mr. Peters was involved with, which is not at issue in this case, has no relevance to this case.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
86	Depo. Ex. 86 - 8/2/10 Email string from Elizabeth Kalodner to John Van Citters re Star Trek. PL0007981 - PL0007982.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). An email between Mr. Peters to CBS and subsequent internal CBS emails regarding an individual who created another film that is not at issue in this case has no relevance to this case.		
87	Depo. Ex. 87 - 8/22/14 Email string from John Van Citters to Elizabeth Kalodner re Staffing - 2015. PL0000765. CONFIDENTIAL.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). An internal CBS email discussing staffing and how the "antics" of Mr. Peters and other individuals continues to have a CBS employee concerned has no relevance to this case.		
88	Depo. Ex. 88 - 4/24/15 Email from John Van Citters to Elizabeth Kalodner re One more thing. PL0008852. CONFIDENTIAL			
89	Depo. Ex. 89 - 7/6/15 Email from Bill Burke to Veronica Hart cc: John Van Citters; Marian Cordry re Axanar. PL0006978. CONFIDENTIAL			
90	Depo. Ex. 90 - 5/31/16 Defendant Alec Peters' Responses to Plaintiff Paramount Pictures Corporation and CBS Studios Inc.'s First Set of Request for Production of Documents	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs continue in their attempts to offer testimony and evidence regarding alleged discovery violations, though no discovery violations have been found against Defendants. See ECF No. 126, Defendants' MIL No. 1.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
91	Depo. Ex. 91 - 1/1/86 The Four Year War	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs should be precluded from relying on evidence relating to allegedly infringed works they failed to claim in their First Amended Complaint. See ECF No. 130, Defendants' MIL No. 3.		
92	Depo. Ex. 92 - 11/26/15 Axanar Script, Revision: 7.7. AX006494-6606. HIGHLY CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Preliminary works such as draft screenplays are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6. It would be a waste of the jury's and the Court's time to review draft scripts when there is no risk such scripts will be used. Id.		
93	Depo. Ex. 93 - Article titled "Behind the scenes filming "Star Trek: Axanar." PL0005893.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
94	Depo. Ex. 94 - 8/18/15 Axanar's Indiegogo fundraising page, Indiegogo, www.indiegogo.com/projects/axanar#/story. PL0011826.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
95	Depo. Ex. 95 - 9/3/15 Star Trek Axanar feature film on track to start filming October 2015 and for release in the first half of 16, Next Big Future, <a href="http://www.nextbigfuture.com/15/09/star-trek-axanar-feature-film-on-track.html">http://www.nextbigfuture.com/15/09/star-trek-axanar-feature-film-on-track.html</a> . PL0006064.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
96	Depo. Ex. 96 - How Axanar Began. AX000193-195. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how Defendants’ allegedly spent the money raised. Id.		
97	Depo. Ex. 97 - 5/30/14 Star Trek: Prelude to Axanar by Axanar Productions - Kickstarter, Kickstarter, <a href="https://www.kickstarter.com/">https://www.kickstarter.com/</a>	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
	projects/194429923/star-trek-prelude-to-axanar. PL0005896-5900.	any authority to support their position that the quality of the work, or the careers or experience of the people who work on them, have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
98	Depo. Ex. 98 - 7/15/15 Axanar's Indiegogo fundraising page, www.indiegogo.com/projects/axanar#/story. PL0005857-5858.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, or the careers or experience of the people who work on them, have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
99	Depo. Ex. 99 - 8/26/15 Robert Meyer Burnett comment re "How \$1.1 Million 'Star Trek' Fan Movie Has Escaped Studio Shutdown (So Far)", The Wrap, www.thewrap.com/how-1-1-million-star-trek-fan-movie-has-escaped-studio-shutdown-so-far. PL0005997-5998.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). The text is unreadable.		
100	Depo. Ex. 100 - 11/15/14 Tweet from Axanar to @AwesomEmergency	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, or the careers or experience of the people who work on them, have any impact		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
101	Depo. Ex. 101 - 10/11/13 Alec Peters Facebook post. PL0012224.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
102	Depo. Ex. 102 - 7/10/15 Dennis Koch Facebook post. PL0011818.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time); Fed. R. Evid. 802 (hearsay). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9. Also the author, Dennis Koch, was not deposed and so this lacks foundation and is hearsay.		
103	Depo. Ex. 103 - 9/24/15 Taking Matters Into His Own Hands, Rich Schepis, The Bronze Review, www.thebronzeview.com (last visited 12/10/15). PL0005743-5745.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time); Fed. R. Evid. 802 (hearsay). Defendants' crowdfunding efforts are completely irrelevant		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		to Plaintiffs' claims. See ECF No. 133, Defendants' MIL No. 5. Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9. Also the author of this article was not deposed and has not submitted any declaration in this matter, so this exhibit is hearsay.		
104	Depo. Ex. 104 - 1/1/14 Certificate of Authorship. AX000355-357. HIGHLY CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants' MIL No. 7. Plaintiffs are not donors to Defendants' crowdfunding campaign, and thus have no standing to object to how Defendants' allegedly spent the money raised. Id.		
105	Depo. Ex. 105 - 7/15 Axanar Electronic Press Kit. PL0011781-11794. CONFIDENTIAL			
106	Depo. Ex. 106 - Excerpts of podcasts that Alec Peters participated in	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendants' crowdfunding efforts are completely irrelevant to Plaintiffs' claims. See ECF No. 133, Defendants' MIL No.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		5. Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
107	Depo. Ex. 107 - 11/11/67 blueprint of the Star Trek sound stage at Paramount Studios. AX028725. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings for a potential stage have no relevance to Plaintiffs’ claims. Preliminary works are too unreliable in determining substantial similarity as to the final work. See ECF No. 134, Defendants’ MIL No. 6.		
108	Depo. Ex. 108 - 8/8/96 blueprint of Star Trek Deep Space Nine sound stage. AX028719. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings for a potential stage have no relevance to Plaintiffs’ claims. Preliminary works are too unreliable in determining substantial similarity as to the final work. See ECF No. 134, Defendants’ MIL No. 6.		
109	Depo. Ex. 109 - 1/1/76 Blueprints. AX028563-28571. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings have no relevance to Plaintiffs’ claims. Preliminary works are too unreliable in determining substantial similarity as to the final work. See ECF No. 134,		



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Ex. No.	Description	Objections	Date Id.	Date Adm.
		Defendants' MIL No. 6.		
110	Depo. Ex. 110 - Diagram of the Enterprise. AX028634. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings for a potential spaceship have no relevance to Plaintiffs' claims. Preliminary works are too unreliable in determining substantial similarity as to the final work. See ECF No. 134, Defendants' MIL No. 6.		
112	Depo. Ex. 112 - 8/27/15 Email from Alec@Axanarproductions.com to John Van Citters; Bill Burke cc: Elizabeth Kalodner; Mallory Levitt re Axanar. PL0000761.			
113	Depo. Ex. 113 - 8/25/15 How \$1.1 Million 'Star Trek' Fan Movie Has Escaped Studio Shutdown (So Far), by Beatrice Verhoeven, The Wrap, <a href="http://www.thewrap.com/how-1-1-million-star-trek-fan-movie-has-escaped-studio-shutdown-so-far">http://www.thewrap.com/how-1-1-million-star-trek-fan-movie-has-escaped-studio-shutdown-so-far</a> . PL0005727-5730.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendants' crowdfunding efforts are completely irrelevant to Plaintiffs' claims. See ECF No. 133, Defendants' MIL No. 5. How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants' MIL No. 7. Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
114	Depo. Ex. 114 - 8/30/15 Axanar and CBS, Axanar Productions, <a href="http://www.axanarproductions.com/axanar-and-cbs">http://www.axanarproductions.com/axanar-and-cbs</a> . PL0005973-5974.			
115	Depo. Ex. 115 - Axanar's Indiegogo fundraising page, Indiegogo, <a href="http://www.indiegogo.com/projects/axanar#/story">www.indiegogo.com/projects/axanar#/story</a> . PL0011827.			
116	Depo. Ex. 116 - 11/16/15 Axanar Productions Estimated New Media Budget. AX000075-87. HIGHLY CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendants' crowdfunding efforts are completely irrelevant to Plaintiffs' claims. See ECF No. 133, Defendants' MIL No. 5. How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants' MIL No. 7. Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
117	Depo. Ex. 117 - 12/15/14 Lease Agreement by and between Industry Drive LLC and Axanar Productions. AX000001-30. HIGHLY CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations, including through a studio lease, has no relevance to copyright infringement. See		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		ECF No. 135, Defendants' MIL No. 7. Plaintiffs are not donors to Defendants' crowdfunding campaign, and thus have no standing to object to how Defendants' allegedly spent the money raised. Id.		
118	Depo. Ex. 118 - 4/15/16 Valkyrie Studios. AX030320.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations, including through a studio lease, has no relevance to copyright infringement. See ECF No. 135, Defendants' MIL No. 7. Plaintiffs are not donors to Defendants' crowdfunding campaign, and thus have no standing to object to how Defendants' allegedly spent the money raised. Id.		
120	Depo. Ex. 120 - 3/8/16 Twitter post from @StarTrekAxanar	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Fed. R. Evid. 602 (lacks foundation). Social media post concerning Defendants' speculation about Plaintiffs' motivation for instant lawsuit is irrelevant to Plaintiff's copyright claims. Defendant Peters has no personal knowledge of Plaintiffs' motivation for instant lawsuit.		
121	Depo. Ex. 121 - 5/11/2007 Email string between Alec Peters and Christian Gossett. GOSSETT-EMAILS--009121-9122.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings have no relevance to Plaintiffs' claims. Preliminary works are too unreliable in determining		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6. It would be a waste of the jury's and the Court's time to review drawings related to draft scripts when there is no risk such scripts will be used. Id.		
122	Depo. Ex. 122 - Drawings of Phasers. AX003045-3048. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings have no relevance to Plaintiffs' claims. Preliminary works are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6. It would be a waste of the jury's and the Court's time to review drawings related to draft scripts when there is no risk such scripts will be used. Id.		
123	Depo. Ex. 123 - Rough drawings of Phasers. AX003032-3044. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings have no relevance to Plaintiffs' claims. Preliminary works are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6. It would be a waste of the jury's and the Court's time to review drawings related to draft scripts when there is no risk such scripts will be used. Id.		
124	Depo. Ex. 124 - 1/4/2011 Email from Alec Peters to Christian Gossett. GOSSETT-EMAILS--009564.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). The fact that Defendants have seen		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		Star Trek works is not disputed, and the fact that they through to re-watch certain works does not shed light on which, if any, of those works were substantially similar to the Axanar works, and whether the Axanar works are in any event, protected by fair use.		
125	Depo. Ex. 125 - 11/25/12 Email string between Christian Gossett and Alec Peters. AX0029228-29233. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings have no relevance to Plaintiffs' claims. Preliminary works are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6. It would be a waste of the jury's and the Court's time to review drawings related to draft scripts when there is no risk such scripts will be used. Id.		
126	Depo. Ex. 126 - 11/13/13 Email from Alec Peters to Christian Gossett. GOSSETT-EMAILS--007167.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Nondescript email with links is irrelevant.		
127	Depo. Ex. 127 - 3/24/13 Email from Sean Tourangeau to Christian Gossett, et al. GOSSETT-EMAILS--009291-9292.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings for a potential costume have no relevance to Plaintiffs' claims. Preliminary works are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
128	Depo. Ex. 128 - 7/28/13 Email string between Alec Peters and Brenda Hinesley. AX029187-29190. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings for a potential costume have no relevance to Plaintiffs' claims. Preliminary works are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6.		
129	Depo. Ex. 129 - 8/14/13 Email from Facebook notification to Christian Gossett. GOSSETT-EMAILS--007324.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendant Peters' movie critique has no relevance to Plaintiffs' claims.		
130	Depo. Ex. 130 - 12/18/13 Email from Alec Peters to Christian Gossett, et al. GOSSETT-EMAILS--007156-7157.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendants' potential and future plans for a studio has no relevance to Plaintiffs' claims. See ECF No. 135, Defendants' MIL No. 7. Allowing Plaintiffs to continue to scrutinize the expenditures for a work that their lawsuit halted, and the financials of renting a studio, would provide no probative value. Id.		
131	Depo. Ex. 131 - 1/6/14 Email from Alec Peters to Christian Gossett. GOSSETT-EMAILS--007123-7124.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings for a potential costume have no relevance to Plaintiffs' claims. Preliminary works such as draft screenplays are too unreliable in determining substantial similarity as to the final work.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		ECF No. 134, Defendants’ MIL No. 6. It would be a waste of the jury’s and the Court’s time to review drawings related to draft scripts when there is no risk such scripts will be used. Id.		
132	Depo. Ex. 132 - 4/26/14 Email from Christian Gossett to Alec Peters, et al. GOSSETT-EMAILS--006024.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Preliminary works such as draft screenplays are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants’ MIL No. 6. It would be a waste of the jury’s and the Court’s time to review notes regarding draft scripts when there is no risk such scripts will be used. Id.		
133	Depo. Ex. 133 - 4/4/14 Email from Christian Gossett to Alec Peters. GOSSETT-EMAILS--007631-7634.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings for a potential costume have no relevance to Plaintiffs’ claims. Preliminary works are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants’ MIL No. 6.		
134	Depo. Ex. 134 - 5/12/14 Email string between Alec Peters and Christian Gossett. GOSSETT-EMAILS--007552-7553.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
135	Depo. Ex. 135 - 5/13/14 Email string between Christian Gossett and Karl Kelly. GOSSETT-EMAILS--008703-8705.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
136	Depo. Ex. 136 - 6/29/14 Email string between Alec Peters and Jhennifer Webberley. GOSSETT-EMAILS--009367-9368.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how Defendants’ allegedly spent the money raised. Id.		
137	Depo. Ex. 137 - 5/8/14 Call Sheet. AX005147. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work		



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Ex. No.	Description	Objections	Date Id.	Date Adm.
		is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
138	Depo. Ex. 138 - Prelude to Axanar Script. AX011521-11541. HIGHLY CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Preliminary works such as draft screenplays are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6. It would be a waste of the jury's and the Court's time to review notes regarding draft scripts when there is no risk such scripts will be used. Id.		
139	Depo. Ex. 139 - 7/9/14 Email from Alec Peters to Christian Gossett. GOSSETT-EMAILS--003483.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9		
140	Depo. Ex. 140 - 7/12/14 Email from Christian Gossett to Terry McIntosh. GOSSETT-EMAILS--003490.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
141	Depo. Ex. 141 - 7/15/14 Email string between Christian Gossett and Alec Peters. GOSSETT-EMAILS--002422-2423.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
142	Depo. Ex. 142 - 7/14/15 Email string between Terry McIntosh, Alec Peters, et al. GOSSETT-EMAILS--009648-9649.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
143	Depo. Ex. 143 - 7/14/15 Email string between Thor Benitez and Christian Gossett. GOSSETT-EMAILS--002545-2547.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Preliminary works such as draft screenplays are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants’ MIL No. 6. It would be a waste of the jury’s and the Court’s time to review notes regarding draft scripts when there is no risk		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		such scripts will be used. Id.		
144	Depo. Ex. 144 - 8/1/14 Christian Gossett Facebook posts	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Preliminary works such as draft screenplays are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6. It would be a waste of the jury's and the Court's time to review notes regarding draft scripts when there is no risk such scripts will be used. Id.		
145	Depo. Ex. 145 - 4/4/14 Email string between Christian Gossett and Alec Peters. GOSSETT-EMAILS--006727-6729.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
146	Depo. Ex. 146 - 4/8/14 Email from Alec Peters to Christian Gossett. GOSSETT-EMAILS--006693.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Email with a nondescript link is irrelevant to determining copyright issues.		
147	Depo. Ex. 147 - 4/13/14 Email from Tobias Richter to Christian Gossett. GOSSETT-EMAILS--006464.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings or backgrounds have no relevance to Plaintiffs' claims. Preliminary works are too		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6.		
148	Depo. Ex. 148 - 3/17/14 Email from Alec Peters to Hamilton Cox, et al. GOSSETT-EMAILS--006964.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings for a potential costume have no relevance to Plaintiffs' claims. Preliminary are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6.		
149	Depo. Ex. 149 - 3/28/14 Email string between Christian Gossett, Tobais Richer, et al. GOSSETT-EMAILS--006858-6866.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Preliminary works are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6.		
152	Depo. Ex. 152 - 10/16/14 Email string between Christian Gossett and Michael DeMeritt. GOSSETT-EMAILS--001134-1138.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs are not donors to Defendants' crowdfunding campaign, and thus have no standing to object to how Defendants' allegedly spent the money raised. Id.		
153	Depo. Ex. 153 - 10/27/14 Email string between Alec Peters and Jeff Carlisle. GOSSETT-EMAILS--001053-1054.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings for a potential costume have no relevance to Plaintiffs' claims. Preliminary works such as draft screenplays are too unreliable in determining substantial		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		similarity as to the final work. ECF No. 134, Defendants' MIL No. 6.		
154	Depo. Ex. 154 - 11/27/14 Email string between ARP Design and Christian Gossett. GOSSETT-EMAILS--000854-858.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Preliminary works are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6. It would be a waste of the jury's and the Court's time to review drawings or scenes related to draft scripts when there is no risk such scripts or scenes will be used. Id.		
155	Depo. Ex. 155 - 11/24/14 Email string between Emil Petrinic and Christian Gossett. GOSSETT-EMAILS--000887-891.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings for a potential costume or scene have no relevance to Plaintiffs' claims. Preliminary works such as draft screenplays are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants' MIL No. 6. It would be a waste of the jury's and the Court's time to review drawings related to draft scripts or scenes when there is no risk such scripts or scenes will be used. Id.		
156	Depo. Ex. 156 - 2/23/15 Email string between Alec Peters and Christian Gossett. GOSSETT-EMAILS--000513-514.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
157	Depo. Ex. 157 - Casting Announcement. AX003372-3373. CONFIDENTIAL. Order unsealing 12/9/16 [Dkt 109].	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
158	Depo. Ex. 158 - 2/25/15 Email string between Christian Gossett and Alec Peters. GOSSETT-EMAILS-001093-1094.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
159	Depo. Ex. 159 - 5/20/15 Email string between Christian Gossett and Alec Peters. GOSSETT-EMAILS-007667.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how Defendants’ allegedly spent the money raised. Id.		
160	Depo. Ex. 160 - 4/29/15 Email from Kevin Haney to Alec Peters. GOSSETT-EMAILS--000274.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how Defendants’ allegedly spent the money raised. Id.		
161	Depo. Ex. 161 - 4/21/15 Email string between christian@axanarproductions.com and Christian Gossett. GOSSETT-EMAILS--000276-278.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Evidence of disputes between Defendant Peters and a disgruntled former colleague have no relevance to Plaintiffs’ claims. See ECF No. 133, Defendants’ MIL No. 5.		
162	Depo. Ex. 162 - 4/11/15 Email string between Alec Peters and Neal Fisher. GOSSETT-EMAILS--000322-323.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		Defendants' allegedly spent the money raised. Id.		
163	Depo. Ex. 163 - 4/21/15 Email string between Christian Gossett and Robert Burnett. GOSSETT-EMAILS--007501-7502.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Evidence of disputes between Defendant Peters and a disgruntled former colleague have no relevance to Plaintiffs' claims. See ECF No. 133, Defendants' MIL No. 5.		
164	Depo. Ex. 164 - 5/12/15 Captain's Log - May 12, 16, by Alec Peters, Axanar Productions, <a href="http://www.axanarproductions.com/captains-log-may-12-2015">http://www.axanarproductions.com/captains-log-may-12-2015</a> .			
165	Depo. Ex. 165 - 7/28/15 Email from Google+ to Christian Gossett. GOSSETT-EMAILS--007551.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Evidence of disputes between Defendant Peters and a disgruntled former colleague have no relevance to Plaintiffs' claims. See ECF No. 133, Defendants' MIL No. 5		
166	Depo. Ex. 166 - 7/27/15 Email string between Jeffrey Morris to Alec Peters. GOSSETT-EMAILS--007516.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Evidence of disputes between Defendant Peters and a disgruntled former colleague have no relevance to Plaintiffs' claims. See ECF No. 133, Defendants' MIL No. 5.		
169	Depo. Ex. 169 - Photograph. AX003503. CONFIDENTIAL			



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Ex. No.	Description	Objections	Date Id.	Date Adm.
170	Depo. Ex. 170 - 6/15/15 Excerpt of Blu-ray News – Fabulous Baker Boys, Son of Kong, Space 1999: S2, Them, Hammer BDs & Axanar: Day 1!, by Bill Hunt, My 2 Cents, The Digital Bits, <a href="http://www.thedigitalbits.com/columns/my-two-cents/061515_1630">http://www.thedigitalbits.com/columns/my-two-cents/061515_1630</a>	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
171	Depo. Ex. 171 - 6/22/15 Excerpt from Captain's Log - June 20/21, 2106, Axanar Productions, <a href="http://www.axanarproductions.com/captains-log-june-2021-2015/">http://www.axanarproductions.com/captains-log-june-2021-2015/</a>	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Preliminary works such as draft screenplays are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants’ MIL No. 6. It would be a waste of the jury’s and the Court’s time to review draft scripts when there is no risk such scripts will be used. Id. Moreover, evidence has demonstrated that the term “locked script” is a term of art, which does not mean that the script will remain static through production of the work. See ECF No. 87-1, Defendants’ Response to Plaintiffs’ Statement of Undisputed Facts.		
172	Depo. Ex. 172 - 8/15/15 Axanar Facebook post. PL0000903.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Preliminary works such as draft screenplays are too unreliable in determining substantial		

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		similarity as to the final work. ECF No. 134, Defendants’ MIL No. 6. It would be a waste of the jury’s and the Court’s time to review draft scripts when there is no risk such scripts will be used. Id. Moreover, evidence has demonstrated that the term “locked script” is a term of art, which does not mean that the script will remain static through production of the work. See ECF No. 87-1, Defendants’ Response to Plaintiffs’ Statement of Undisputed Facts.		
173	Depo. Ex. 173 - 11/26/15 Axanar Script, Revision 7.7. AX026616-26729. HIGHLY CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Preliminary works such as draft screenplays are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants’ MIL No. 6. It would be a waste of the jury’s and the Court’s time to review draft scripts when there is no risk such scripts will be used. Id.		
174	Depo. Ex. 174 - 8/19/14 Kickstarter Updates: The Scarecrow Project and Star Trek: Axanar!, My 2 Cents, by Bill Hunt, Editor, The Digital Bits, <a href="http://thedigitalbits.com/columns/my-two-cents/081914_1245">http://thedigitalbits.com/columns/my-two-cents/081914_1245</a>	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Fed. R. Evid. 602 (lacks foundation). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how Defendants’ allegedly spent the		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		money raised. Id. Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
175	Depo. Ex. 175 - 8/25/14 Star Trek: The Compendium Review, Plus Star Trek: Axanar & Lord Richard Attenborough RIP, My 2 Cents, by Bill Hunt, Editor, The Digital Bits, <a href="http://www.thedigitalbits.com/columns/my-two-cents/082514_0010">http://www.thedigitalbits.com/columns/my-two-cents/082514_0010</a>	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). How Defendants spent money received through donations has no relevance to copyright infringement. See ECF No. 135, Defendants’ MIL No. 7. Plaintiffs are not donors to Defendants’ crowdfunding campaign, and thus have no standing to object to how Defendants’ allegedly spent the money raised. Id. Allowing Plaintiffs to continue to scrutinize the expenditures for a work that their lawsuit halted, and the financials of renting a studio, would provide no probative value. Id.		
176	Depo. Ex. 176 - 4/23/15 Blue-ray News: Prelude to Axanar, I Love Lucy: Ultimate S2, People Under the Stars & More, My 2 Cents, by Bill Hunt, Editor, The Digital Bits, <a href="http://www.thedigitalbits.com/columns/my-two-cents/042315_1230">http://www.thedigitalbits.com/columns/my-two-cents/042315_1230</a> . PL0005810-5812.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Fed. R. Evid. 602 (lacks foundation). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
177	Depo. Ex. 177 - 7/6/15 Blu-ray News – Terminator Genisys, Star Trek: Axanar, Zatoichi, Blacklist: S2 & The Bits @ Comic-Con!, My 2 Cents, by Bill Hunt, Editor, The Digital Bits, <a href="http://www.thedigitalbits.com/columns/my-two-cents/070615_1345">http://www.thedigitalbits.com/columns/my-two-cents/070615_1345</a>	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Fed. R. Evid. 602 (lacks foundation). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9. Moreover, preliminary works are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants’ MIL No. 6.		
179	Depo. Ex. 179 - 9/21/15 TheDigitalBits.com Facebook post sharing Axanar's photo	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Preliminary works such as draft screenplays are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants’ MIL No. 6. It would be a waste of the jury’s and the Court’s time to review draft scripts when there is no risk such scripts will be used. Id.		
180	Depo. Ex. 180 - 4/14/16 Email to Justin from Martin Kelly re Star Trek Beyond Fan Event - Press Release, draft for approval.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). A draft press release about Plaintiffs’ newest Star Trek motion picture, Star		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
	PL0012693-PL0012734. CONFIDENTIAL	Trek Beyond, is not relevant to this case.		
181	Depo. Ex. 181 - Twitter Image. AX000056.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). A tweet by the director of Star Trek Beyond, a Star Trek motion picture, is not relevant to this case. Lin is not a copyright holder, nor is he an employee of Plaintiffs. At the time of this statement, Lin had not seen Prelude or the Vulcan scene.		
189	Depo. Ex. 189 - 4/29/15 Confidential Non-Disclosure Agreement ("Agreement") Between Axanar Production and Terry McIntosh	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
190	Depo. Ex. 190 - Terry McIntosh reply to Misty Mills's post re Ares Digital v3.14159	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Evidence of disputes between Defendant Peters and a disgruntled former colleague have no relevance to Plaintiffs' claims. See ECF No. 133, Defendants' MIL No. 5.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
198	Depo. Ex. 198 - 2/11/13 Email string between Alec Peters and Doug Drexler. AX035311-35313. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
199	Depo. Ex. 199 - 5/19/14 Email string between Alec Peters (cc Lewis, Mark, et al.). GOSSETT-EMAILS--005193-5194.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on them, or the colloquial use of the word "professional," have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
200	Depo. Ex. 200 - 10/26/15 List of "Star Trek" licensed products that Alec Peters has purchased. AX035743. CONFIDENTIAL			
201	Depo. Ex. 201 - "Axanar" Master 2014-16 Oct. Revised." AX035571-35737. CONFIDENTIAL	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). Lacks foundation. FRE 802 (Hearsay). In response to Plaintiffs' document requests, Defendants produced a financial statement. Then, after Mr. Peters' first deposition, he altered the financial statement Peters		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		<p>“reversed” out certain expenses by attempting to offset them with the lease payments he was required to make on the studio he rented. Defendants’ post-lawsuit financial transactions relating to Axanar Productions, including their manipulation of the financial statement, are irrelevant because they do not eliminate the fact that prior to the filing of this lawsuit, Defendants profited from the business that they created. Also, this financial statement was created by Defendants during this litigation, has no probative weight and is prejudicial.</p>		
202	<p>Depo. Ex. 202 - 7/8/14 Email string between Alec Peters and Rocio Evenett. GOSSETT-EMAILS--001767-1771.</p>	<p>Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings for a potential costume have no relevance to Plaintiffs’ claims. Preliminary works are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants’ MIL No. 6. It would be a waste of the jury’s and the Court’s time to review drawings related to draft scripts when there is no risk such scripts will be used. Id.</p>		
203	<p>Depo. Ex. 203 - 10/12/14 Email from Alec Peters to Christian Gossett. GOSSETT-EMAILS--001225.</p>	<p>Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, the careers or experience of the people who work on</p>		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		them, or the colloquial use of the word “professional,” have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants’ MIL No. 9.		
204	Depo. Ex. 204 - 10/27/14 Email string between Alec Peters and Christian Gossett. GOSSETT-EMAILS--001057-1058.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Concept drawings for a potential costume have no relevance to Plaintiffs’ claims. Preliminary works are too unreliable in determining substantial similarity as to the final work. ECF No. 134, Defendants’ MIL No. 6.		
205	Depo. Ex. 205 - Facebook Messenger exchange between Alec Peters and Terry McIntosh	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendants’ use of the Star Trek name or trademark is irrelevant to Plaintiffs’ claim in this case, as Plaintiffs have not alleged any counts of trademark infringement. See ECF No. 136, Defendants’ MIL No. 8.		
206	Depo. Ex. 206 - Facebook Messenger exchange between Alec Peters and Terry McIntosh	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendants’ use of the Star Trek name or trademark is irrelevant to Plaintiffs’ claim in this case, as Plaintiffs have not alleged any counts of trademark infringement. See ECF No. 136, Defendants’ MIL No. 8.		
207	Depo. Ex. 207 - 11/23/14 Facebook Messenger exchange between Alec Peters and Terry McIntosh	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendants’ use of the Star		



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Ex. No.	Description	Objections	Date Id.	Date Adm.
		Trek name or trademark is irrelevant to Plaintiffs' claim in this case, as Plaintiffs have not alleged any counts of trademark infringement. See ECF No. 136, Defendants' MIL No. 8.		
208	Depo. Ex. 208 - 5/26/14 Facebook Messenger exchange between Alec Peters and Terry McIntosh	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time).		
209	Depo. Ex. 209 - Facebook Messenger exchange between Alec Peters and Terry McIntosh	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs have not presented any authority to support their position that the quality of the work, or the careers or experience of the people who work on them, have any impact on whether a work is infringing or improper under copyright law. See ECF No. 137, Defendants' MIL No. 9.		
210	Depo. Ex. 210 - Facebook Messenger exchange between Alec Peters and Terry McIntosh	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendants' use, or nonuse, of the Star Trek name or trademark is irrelevant to Plaintiffs' claim in this case, as Plaintiffs have not alleged any counts of trademark infringement. See ECF No. 136, Defendants' MIL No. 8.		
211	Depo. Ex. 211 - Facebook Messenger exchange between Alec Peters and Terry McIntosh	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendants' use, or nonuse, of the Star Trek name or trademark is irrelevant to Plaintiffs' claim in this case, as Plaintiffs have not alleged any		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		counts of trademark infringement. See ECF No. 136, Defendants' MIL No. 8		
212	Depo. Ex. 212 - 4/12/15 Facebook Messenger exchange between Alec Peters and Terry McIntosh	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Defendants' use of the Star Trek name or trademark is irrelevant to Plaintiffs' claim in this case, as Plaintiffs have not alleged any counts of trademark infringement. See ECF No. 136, Defendants' MIL No. 8.		
213	Depo. Ex. 213 - Facebook Messenger exchange between Alec Peters and Terry McIntosh	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Preliminary works are too unreliable in determining substantial similarity as to the final work. See ECF No. 134, Defendants' MIL No. 6.		
214	Depo. Ex. 214 - Facebook Messenger exchange between Alec Peters and Terry McIntosh	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Evidence that Defendant Peters' career aspirations is not relevant to Plaintiffs' claims. See ECF No. 137, Defendants' MIL No. 9.		
215	Depo. Ex. 215 - 3/7/15 Email from Alec Peters to christian@axanarproductions.com. GOSSETT-EMAILS--00422.	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Evidence of disputes between Defendant Peters and a disgruntled former colleague have no relevance to Plaintiffs' claims. See ECF No. 133, Defendants' MIL No. 5.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
220	Depo. Ex. 220 - August 16 Star Trek Fan Film Guidelines Focus Group Report Prepared for CBS and Paramount Submitted by Organized Fans. PL0013816 - PL0013853.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 602 (Lacks foundation). The Star Trek guidelines are not relevant to this case. Defendants intend to submit this exhibit in order to argue that the Axanar film is a fan film. While Defendants label the Axanar Works as a “fan film,” no court has ever held that a “fan film” (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis.		
221	Depo. Ex. 221 - 8/2/14 Email from Risa Kessler to Bill Burke cc: John Van Citters re "Fan Film" Concepts. PL0013110 - PL0013111.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). An internal CBS email about other films is not relevant to this case. While Defendants label the Axanar Works as a “fan film,” no court has ever held that a “fan film” (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis.		
222	Depo. Ex. 222 - 04/30/13 - Email string from Bill Burke to David Grant cc Ryan Adams re Star Trek Continues with attachment. PL0012993.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). An internal CBS email about another film that is not at issue in this case has no relevance to this case. Defendants intend to submit this exhibit in order to argue that the Axanar film is a fan film. While Defendants label the Axanar Works as a “fan film,” no court has ever held that a “fan film” (whether or not that label is accurate, which in this case it is not) has any		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		impact on the copyright infringement analysis. Moreover, whether Plaintiffs have sued other “fan film” creators is legally irrelevant as well.		
223	Depo. Ex. 223 - 5/11/10 - Email from John Van Citters to Liz Kalodner; Bill Burke; Ian Spellin re James Cawley; Fan Films. PL0013083.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). A CBS email about another film that is not at issue in this case has no relevance to this case. Defendants intend to submit this exhibit in order to argue that the Axanar film is a fan film. While Defendants label the Axanar Works as a “fan film,” no court has ever held that a “fan film” (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis. Moreover, whether Plaintiffs have sued other “fan film” creators is legally irrelevant as well.		
224	Depo. Ex. 224 - 9/20/12 Redacted Email from Bill Burke to Ian Spelling re houston huddleston. PL0007895. CONFIDENTIAL	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). An internal CBS email about doing a piece on Alec Peters and discussing how he is a licensee is not relevant to this case.		
225	Depo. Ex. 225 - 2/25/15 Email string from Bill Burke to John Van Citters re Vul-Con. PL0007016 - PL0007017. CONFIDENTIAL			

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Ex. No.	Description	Objections	Date Id.	Date Adm.
226	Depo. Ex. 226 - 2/25/15 Email string from Bill Burke to mallory@thelicensingshop.com re Vulcan Question. PL0007897 - PL0007899. CONFIDENTIAL			
227	Depo. Ex. 227 - 5/20/16 Email string from John Van Citters to Liz Kalodner; cc: John Wentworth; Bill Burke; Leslie Ryan; Yasmin Elachi re CBS/Paramount Statement. PL0012807 - PL0012808. CONFIDENTIAL	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). An internal CBS email after the lawsuit that discusses the lawsuit is not relevant to this case.		
228	Depo. Ex. 228 - 12/18/13 Redacted Email String from Bill Burke to ianspellin@aol.com; Yasmin Elachi re Addresses. PL0010034. CONFIDENTIAL	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). A CBS email discussing CBS not being happy with Peters in 2013, prior to the fundraising for the Axanar Works, is not relevant to this case.		
229	Depo. Ex. 229 - 7/29/15 Email string from Bill Burke to Travis Pierson [Redacted] re Nimoy Documentary. PL0010249. CONFIDENTIAL	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). An email discussing Peters' work on a documentary about Leonard Nimoy is not relevant to this case.		
230	Depo. Ex. 230 - 7/28/14 Email string from Bill Burke to Clayton Stone cc: Erika Winterholler; Yasmin Elachi re Vulcan Harp app - crowd funding. PL0013041 - PL0013042.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). A CBS email about other films is not relevant to this case. Defendants intend to submit this exhibit in order to argue that the Axanar film is a fan film. While Defendants label the Axanar Works as a "fan film," no court has ever held that a "fan film" (whether or not that label is accurate, which in this case it is not) has any impact on the copyright		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		infringement analysis. Moreover, whether Plaintiffs have sued other “fan film” creators is legally irrelevant as well.		
231	Depo. Ex. 231 - 7/31/14 Email string from Bill Burke to Leslie Ryan cc: Brian Reinert; CBS; Yasmin Elachi; Chelsea Dutchik; Kimberly Burnell re Can you do a quick call tomorrow with me and John? PL0012988 - PL00129992.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). A CBS email about other films is not relevant to this case. Defendants intend to submit this exhibit in order to argue that the Axanar film is a fan film. While Defendants label the Axanar Works as a “fan film,” no court has ever held that a “fan film” (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis. Moreover, whether Plaintiffs have sued other “fan film” creators is legally irrelevant as well.		
300	Depo. Ex. 300 - Justin Lin Tweet. AX000057.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). A tweet by the director of Star Trek Beyond, a Star Trek motion picture, is not relevant to this case. Lin is not a copyright holder, nor is he an employee of Plaintiffs. At the time of this statement, Lin had not seen Prelude or the Vulcan scene.		
302	Depo. Ex. 302 - 4/14/16 Email string from Justin Lin to JJ Abrams cc: Rob Moore; Lindsey Weber; Martin Kelley; Katherine Rowe; Morgan Dameron; Megan Colligan re Star Trek Beyond Fan Event - Press Release, draft for approval.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). A draft press release about Plaintiffs’ newest Star Trek motion picture, Star Trek Beyond, is not relevant to this case.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
	PL0012788.			
303	Depo. Ex. 303 - Transcript of J.J. Abrams Statement	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). Abrams is not a copyright holder, nor is he an employee of Plaintiffs. At the time of this statement, Abrams had only seen a short clip of Prelude.		
304	Depo. Ex. 304 - 5/20/16 - Email from Liz Kalodner to John Wentworth cc: Bill Burke; Leslie Ryan; Yasmin Elachi; John Van Citters re CBS/Paramount Statement. PL0012809 - PL0012810. CONFIDENTIAL	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). CBS emails about statements made by Justin Lin and J.J. Abrams are not relevant. Neither of them are the copyright holders, nor are they employees of Plaintiffs.		
305	Depo. Ex. 305 - Social Media Posts	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). Tweets by Axanar Productions made after this lawsuit about Plaintiffs' newest motion picture, Star Trek Beyond, are not relevant to this case.		
306	Depo. Ex. 306 - 6/27/16 - Email from Rob Moore to Megan Colligan re Update. PL0012799.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). Paramount emails about other films are not relevant to this case. Defendants intend to submit this exhibit in order to argue that the Axanar film is a fan film. While Defendants label the Axanar Works as a "fan film," no court has ever held that a "fan film" (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
307	Depo. Ex. 307 -5/21/16 Email string to JJ from Rob Moore. PL0012793.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). Abrams is not a copyright holder, nor is he an employee of Plaintiffs. At the time of this statement, Abrams had only seen a short clip of Prelude.		
310	Depo. Ex. 310 - Axanar Tweets	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). Tweets by Axanar Productions made after this lawsuit about Plaintiffs’ newest motion picture, Star Trek Beyond, are not relevant to this case.		
311	Depo. Ex. 311 - 6/28/16 Email chain to JJ Abrams from Rob Moore. PL0012794.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). Abrams is not a copyright holder, nor is he an employee of Plaintiffs. At the time of this statement, Abrams had only seen a short clip of Prelude.		
312	Depo. Ex. 312 -11/9/16- Fan Film Guidelines	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). Lacks foundation. While Defendants label the Axanar Works as a “fan film,” no court has ever held that a “fan film” (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis.		
500	Concept art. AX028741. CONFIDENTIAL	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time).		



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Ex. No.	Description	Objections	Date Id.	Date Adm.
501	[Dkt 72-15] Exhibit M to 11/16/16 Grossman Declaration - Prelude to Axanar The Illustrated Script of the Short Film			
502	[Dkt 72-50] Exhibit UU to 11/16/16 Grossman Declaration - 12/16/1986 Copyright registrations for the Original Series (1966-1969), Star Trek: The Next Generation (1987-1994), Star Trek: Deep Space Nine (1993-1999), Star Trek: Voyager (1995-2001), and Star Trek: Enterprise (2001-2005). Collectively, the “Star Trek Television Series.”			
503	[Dkt 72-54] Exhibit VV to 11/16/16 Grossman Declaration - 12/12/1979 Copyright registrations for Star Trek – The Motion Picture (1979), Star Trek II – The Wrath of Khan (1982), Star Trek III The Search for Spock (1984), Star Trek IV: The Voyage Home (1986), Star Trek V: The Final Frontier (1989), Star Trek VI – The Undiscovered Country (1991), Star Trek Generations (1994), Star Trek: First Contact (1996), Star Trek: Insurrection (1998), Star Trek Nemesis (2002), Star Trek (2009), Star Trek Into Darkness (2013), Star Trek Beyond (16). Collectively, the “Star Trek Motion Pictures.”			

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Ex. No.	Description	Objections	Date Id.	Date Adm.
504	[Dkt 72-55] Exhibit WW to 11/16/16 Grossman Declaration - 4/18/03 Copyright registration for Garth of Izar			
505	[Dkt 72-56] Exhibit XX to 11/16/16 Grossman Declaration - 8/26/06 Copyright registration for Strangers from the Sky			
506	[Dkt 72-57] Exhibit YY to 11/16/16 Grossman Declaration -8/19/08 Copyright registration for Infinity's Prism. PL0000768-769.			
507	[Dkt 72-62] Exhibit BBB to 11/16/16 Van Citters Declaration -10/27/16 Copyright registration to The Four Years War	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs should be precluded from relying on evidence relating to allegedly infringed works they failed to claim in their First Amended Complaint. See ECF No. 130, Defendants' MIL No. 3. Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
508	[Dkt 86-2] Unredacted Version of Exhibit 3 to 11/16/16 Oki Declaration - Expert Report of Christian Tregillis, CPA, ABV, CFF, CLP	Pltfs: FRE 403 (prejudicial). FRE 802 (Hearsay). FRE 702 (Lacks basis for expert opinion). Lacks foundation. Mr. Tregillis lacks competence or expertise to opine on the topics covered in his report.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
509	[Dkt 75-6] Exhibit 4 to 11/16/16 Oki Declaration - Report of Henry Jenkins	Pltfs: FRE 403 (prejudicial). FRE 802 (Hearsay). FRE 702 (Lacks basis for expert opinion). Lacks foundation. Mr. Jenkins lacks competence or expertise to opine on what aids or competes with motion pictures and television programming, and he does not use any data to support his opinions. Further, he purports to claim that Prelude to Axanar is transformative with no expertise in the area, and he admits although he is Defendants' expert, he hasn't even read the Axanar Script at issue in this case. His report is not signed under oath.		
510	[Dkt 86-7] Unredacted version of Exhibit 3 to 11/16/16 Peters Declaration - Script: "The Undying One" (aka "AXANAR") Part 1. AX031943 - AX031989.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). FRE 403 (prejudicial). This script, which was created after this litigation was filed, bears no relevance to Plaintiffs' claims for infringement because Plaintiffs have not filed suit based on this script. Also, this script was created by Defendants during this litigation, has no probative weight and is prejudicial.		
511	[Dkt 86-8] Unredacted version of Exhibit 3 to 11/16/16 Peters Declaration - Script: "The Undying One" (aka "AXANAR") Part 2. AX031990 - AX032066.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). FRE 403 (prejudicial). This script, which was created after this litigation was filed, bears no relevance to Plaintiffs' claims for infringement because Plaintiffs have not filed suit based on this script. Also, this script was created by Defendants during		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		this litigation, has no probative weight and is prejudicial.		
512	[Dkt 75-23] Exhibit 4 to 11/16/16 Peters Declaration - 7/21 Star Trek Beyond	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). A tweet by Mr. Peters made after this lawsuit telling people to see Star Trek Beyond, Plaintiffs' most recent motion picture, has no relevance to this case. Moreover, this document was never produced by Defendants in this case.		
513	[Dkt 75-24] Exhibit 5 to 11/16/16 Peters Declaration - Axanar Tweet	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). A tweet by Mr. Peters made after this lawsuit about Star Trek Beyond, Plaintiffs' most recent motion picture, has no relevance to this case. Moreover, this document was never produced by Defendants in this case.		
514	[Dkt 75-26] Exhibit 1 to 11/16/16 Lane Declaration - January 16 Executive Summary a History of STAR TREK fan films Part 1. AX000213 - AX000304.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). FRE 602 (Lacks foundation). FRE 701-703 (Purported "expert" opinion by a witness not qualified as an expert). This summary of other films has no relevance to this case. Defendants intend to submit this exhibit in order to argue that the Axanar film is a fan film. While Defendants label the Axanar Works as a "fan film," no court has ever held that a "fan film" (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis. Moreover, whether Plaintiffs have sued other "fan film"		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		creators is legally irrelevant as well.		
515	[Dkt 75-27] Exhibit 1 to 11/16/16 Lane Declaration - January 16 Executive Summary a History of STAR TREK fan films Part 2. AX000305 - AX000340.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). FRE 602 (Lacks foundation). FRE 701-703 (Purported “expert” opinion by a witness not qualified as an expert). This summary of other films has no relevance to this case. Defendants intend to submit this exhibit in order to argue that the Axanar film is a fan film. While Defendants label the Axanar Works as a “fan film,” no court has ever held that a “fan film” (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis. Moreover, whether Plaintiffs have sued other “fan film” creators is legally irrelevant as well.		
516	[Dkt 75-29] Exhibit 1 to 11/16/16 Watkins Declaration - Screen Shot Axanar Fan Group Page	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). FRE 602 (Lacks foundation). These post-litigation posts on the Axanar Fan Group page have no relevance to this case. Moreover, this document was never produced by Defendants in this case.		
517	[Dkt 90-9] Exhibit H to 11/28/16 Ranahan Declaration - Wikipedia Definition of Mockumentary	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 602 (Lacks foundation). FRE 802 (Hearsay). This Wikipedia page states that a “mockumentary” is sometimes defined as a parody. Mr. Peters however, testified		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		that Prelude to Axanar was not a parody.		
518	[Dkt 94-5] Unredacted Exhibit 1 to 11/28/16 Peters Declaration Financial Summary. AX035571 - AX035737.	Pltfs: With respect to bates range, AX035571 - AX035737: FRE 401, 402 (Relevance). FRE 403 (prejudicial). Lacks foundation. FRE 802 (Hearsay). In response to Plaintiffs' document requests, Defendants produced a financial statement. Then, after Mr. Peters' first deposition, he altered the financial statement Peters "reversed" out certain expenses by attempting to offset them with the lease payments he was required to make on the studio he rented. Defendants' post-lawsuit financial transactions relating to Axanar Productions, including their manipulation of the financial statement, are irrelevant because they do not eliminate the fact that prior to the filing of this lawsuit, Defendants profited from the business that they created. Also, this financial statement was created by Defendants during this litigation, has no probative weight and is prejudicial. To the extent that Defendants intend to introduce PL0013763-PL0013785 (which is Exhibit 1 to Peters' declaration), Plaintiffs do not object.		
519	[Dkt 90-13] Exhibit 3 to 11/28/16 Peters Declaration - 7/6/15 Email string from Liz Kalodner to alec@axanarproductions.com cc: John Van Citters; Mallory Levitt; Bill Burke re Axanar. PL0013787 - PL0013788.			

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Ex. No.	Description	Objections	Date Id.	Date Adm.
520	[Dkt 90-14] Exhibit 4 to 11/28/16 Peters Declaration - Facebook posts. PL0013517.			
521	[Dkt 90-15] Exhibit 5 to 11/28/16 Peters Declaration - Email re Fan Films Facebook Posts. PL0013502 - PL0013503.			
522	[Dkt 90-16] Exhibit 6 to 11/28/16 Peters Declaration - Press Release - Unique Trek Project Marks the Return of Garth of Izar	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). FRE 1002 (Best evidence). A purported Axanar Productions Press Release stating that “[t]wo major players in the universe of Star Trek fan films” planned to collaborate is irrelevant. While Defendants label the Axanar Works as a “fan film,” no court has ever held that a “fan film” (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis. Moreover, this document was never produced by Defendants in this case.		
523	[Dkt 90-17] Exhibit 7 to 11/28/16 Peters Declaration - Facebook Response. PL0011822.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). FRE 1002 (Best evidence). A Facebook post by Axanar claiming that CBS has laid out unofficial rules for Star Trek fan films is irrelevant. While Defendants label the Axanar Works as a “fan film,” no court has ever held that a “fan film” (whether or not that label is accurate, which in this case it is not) has any impact on the copyright infringement analysis.		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
524	[Dkt 94-6 ] Unredacted Exhibit 8 to 11/28/16 Peters Declaration - Facebook Post by Axanar. PL0008222.			
525	[Dkt 90-20] Exhibit 10 to 11/28/16 Peters Declaration - Blog Post. PL0005973 - PL0005989.			
526	[Dkt 90-21] Exhibit 11 to 11/28/16 Peters Declaration - Comic Con Document re Axanar. PL0000106 - PL0000134.			
527	[Dkt 90-23] Exhibit 13 to Peters Declaration in Support of Opposition to Plaintiffs' Motion for Partial Summary Judgment - Axanar Facebook Post	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). A twitter post from Defendant Axanar Productions, Inc. after this lawsuit other films is not relevant to this case. Moreover, this document was never produced by Defendants in this case.		
528	[Dkt 90-24] Exhibit 14 to 11/28/16 Peters Declaration - Twitter Post	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). A twitter post from Defendant Axanar Productions, Inc. after this lawsuit stating that "CBS shut down another fan film" is not relevant to this case. Moreover, this document was never produced by Defendants in this case.		
529	[Dkt 94-8] Unredacted Exhibit 15 to 11/28/16 Peters Declaration - 8/20/16 Email string from Bill Burke to John Van Citters re The Wrap is inquiring about the Kickstarter Star Trek fan film. PL0012814 - PL0012816.			



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Ex. No.	Description	Objections	Date Id.	Date Adm.
530	[Dkt 94-9] Exhibit 16 to 11/28/16 Peters Declaration - 8/8/15 Email string from Marian Cordry to Holly Amos, John Citters re SIGH. PL0008689.			
531	Physical Exhibit: [Dkt 72-63] DVDs of Star Trek Television Series titled The Original Series (1966-1969)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
532	Physical Exhibit: [Dkt 72-63] DVDs of Star Trek Television Series titled Star Trek: The Next Generation (1987-1994)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
533	Physical Exhibit: [Dkt 72-63] DVDs of Star Trek Television Series titled Star Trek: Deep Space Nine (1993-1999)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
534	Physical Exhibit: [Dkt 72-63] DVDs of Star Trek Television Series titled Star Trek: Voyager (1995-2001)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants’ MIL No. 2.		
535	Physical Exhibit: [Dkt 72-63] DVDs of Star Trek Television Series titled Star Trek: Enterprise (2001-2005)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants’ MIL No. 2.		
536	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek – The Motion Picture (1979)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants’ MIL No. 2.		
537	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek II – The Wrath of Khan (1982)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants’ MIL No. 2.		
538	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek III The Search for Spock (1984)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
539	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek IV: The Voyage Home (1986)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
540	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek V: The Final Frontier (1989)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
541	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek VI – The Undiscovered Country (1991)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
542	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek Generations (1994)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this		

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Ex. No.	Description	Objections	Date Id.	Date Adm.
		evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
543	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek: First Contact (1996)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
544	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek: Insurrection (1998)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
545	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek Nemesis (2002)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
546	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek (2009)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery		

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		period. See ECF No. 128, Defendants' MIL No. 2.		
547	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek Into Darkness (2013)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2		
548	Physical Exhibit: [Dkt 72-63] DVD of Star Trek Motion Picture titled Star Trek Beyond (2016)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
549	Physical Exhibit: [Dkt 72-63] DVD of Prelude to Axanar (8/15/14)			
550	Physical Exhibit: [Dkt 72-63] DVD of Vulcan Scene (4/28/16)			
551	Physical Exhibit: [Dkt 72-63] Book titled Garth of Izar (2003)	Defs: Fed. R. Evid. 401, 402 (relevance). Fed. R. Evid. 403 (more prejudicial than probative, waste of time). Plaintiffs attempt to rely on evidence improperly withheld from Defendants, as Plaintiffs failed to timely produce this evidence during the discovery period. See ECF No. 128, Defendants' MIL No. 2.		
552	Physical Exhibit: Trailer for Axanar feature available at <a href="https://www.youtube.com/watch?v=Np_PVbW6y64">https://www.youtube.com/watch?v=Np_PVbW6y64</a>			

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Ex. No.	Description	Objections	Date Id.	Date Adm.
553	Physical Exhibit: Trailer for Axanar feature available at <a href="https://www.youtube.com/watch?v=T_4W5ywBTpE">https://www.youtube.com/watch?v=T_4W5ywBTpE</a>			
554	Physical Exhibit: [Dkt 75-20] DVD of Prelude to Axanar. AX031132.			
555	Physical Exhibit: [Dkt 75-21] DVD of Vulcan Scene. AX031131.			
556	Physical Exhibit: Source Video. AX035895.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). This video was produced on November 3, after the close of discovery and after the second court-ordered deposition of Mr. Peters, which was ordered by the Court because of his failure to produce documents in discovery. This video, which contains clips from some television shows and films, has no relevance to this case. It appears to have been prepared for this litigation.		
557	Physical Exhibit: Axanar Motion Picture Directors WIP Reel. AX035807.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). This video is a “work in progress” of Axanar. This video was produced on November 3, after the close of discovery and after the second court-ordered deposition of Mr. Peters, which was ordered by the Court because of his failure to produce documents in discovery.		

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558		Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). FRE 802 (Hearsay). A video showing Justin Lin and J.J. Abrams after this lawsuit is not relevant. Neither of them are the copyright holders, nor are they employees of Plaintiffs. At the time of this statement, Abrams had only seen a short clip of Prelude. At the time of this statement, Lin had not seen Prelude or the Vulcan scene.		
559	Physical Exhibit: Parody Video. AX035744.	Pltfs: FRE 401, 402 (Relevance). FRE 403 (prejudicial). Lacks foundation. FRE 802 (Hearsay). This cartoon video, which Defendants refer to as a “parody video” and appears to be a parody of Prelude to Axanar, has no relevance to this case.		
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564	Placeholder - Plaintiffs' Demonstrative			

Dated: December 19, 2016

LOEB & LOEB LLP  
 JONATHAN ZAVIN  
 DAVID GROSSMAN  
 JENNIFER JASON

By: /s/ David Grossman  
 David Grossman  
 Attorneys for Plaintiffs  
 PARAMOUNT PICTURES  
 CORPORATION and CBS STUDIOS  
 INC.

1 Dated: December 19, 2016

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By: /s/ Erin R. Ranahan  
Erin R. Ranahan  
Attorneys for Defendants  
AXANAR PRODUCTIONS, INC. and  
ALEC PETERS