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10 Attorneys for Plaintiffs
PARAMOUNT PICTURES
11 CORPORATION and CBS STUDIOS
INC.
12

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15

16 PARAMOUNT PICTURES
CORPORATION, a Delaware
17 corporation; and CBS STUDIOS INC.,
a Delaware corporation,
18

19 Plaintiffs,

20 v.

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

23 Defendants.
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27
28

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

**PLAINTIFFS' PROPOSED VOIR
DIRE QUESTIONS**

Trial: January 31, 2017

1 Plaintiffs Paramount Pictures Corporation and CBS Studios Inc. (collectively,
2 “Plaintiffs”) submit the following proposed voir dire questions:

3 1. You have heard the general statement of the case. Do you believe there
4 is anything that might prevent you from being fair and impartial in this case?

5 2. Do you believe that you will not be able to follow the Court’s
6 instructions in this case, even if you disagree with them?

7 3. Do you believe that you will not be able to apply the law in this case as
8 described for you by the Court, if it turns out that you disagree with the law?

9 4. Do you believe that you may decide to disregard the law as described
10 by the Court, and instead make decisions based on your own views and experience?

11 5. Are you presently employed and, if so, full time or part time?

12 a. Who is your present employer?

13 b. What is the nature of the business of your employer?

14 c. What is your position?

15 6. Who were your prior employers (including self-employment) and
16 places of employment (including work at home) for the past ten (10) years?

17 7. Have you ever been employed at Paramount Pictures or CBS, or any
18 company connected with them?

19 8. Has anyone you know ever been employed at Paramount Pictures or
20 CBS, or any company connected with them?

21 9. What is your spouse’s occupation?

22 10. Do you have a high school diploma or equivalent?

23 11. Do you have a college degree?

24 12. Do you have a master’s degree?

25 13. Do you have a doctoral degree?

26 14. Have you ever been charged with a crime? If so,

27 a. Please describe the crime that you were charged with.

28 b. Please describe the outcome.

- 1 15. Have you ever been a party, either as a plaintiff or a defendant, in a
2 lawsuit? If so,
- 3 a. Where was it brought?
4 b. What was the lawsuit about?
5 c. What was the outcome of the case?
6 d. Were you satisfied with the result?
- 7 16. Have you ever served on a jury before? If so,
8 a. In what courthouse did you serve?
9 b. Was it a civil or criminal case?
10 c. Did your jury reach a verdict?
- 11 17. Are there any lawyers in your family? If so,
12 a. Who?
13 b. Where are they located?
- 14 18. Have you ever been involved in a lawsuit involving films, television, or
15 the television industry?
- 16 19. Are you a filmmaker?
17 20. Have you ever created any fan fiction?
18 21. Have you ever read or seen any fan fiction projects?
19 22. Have you heard of *Star Trek: Axanar*?
20 23. Have you seen *Star Trek: Prelude to Axanar*?
21 24. Have you ever written or created something that you consider to be a
22 literary work, work of art, or other creative work? If so,
23 a. What did you create?
24 b. Can you describe the process of creating it?
25 c. What motivated you to create it?
- 26 25. Have you ever felt that someone copied part or all of something that
27 you created? If so,
28 a. How did that person copy your creation?

1 b. What did you do when you found out he or she copied it?

2 26. Have you ever registered for a copyright, patent, or trademark?

3 27. Do you have someone close to you who has been involved in a dispute
4 over a copyright, patent, or trademark?

5 28. Do you believe that copyrighted material should not be entitled to
6 protection under the law?

7 29. Some people think that intellectual property is different than regular
8 property, and that stealing intellectual property is not as bad as stealing regular
9 property. Do you agree with that?

10 30. Have you ever heard of Star Trek?

11 31. Have you ever seen a Star Trek movie, television show, or read a Star
12 Trek book?

13 32. Do you consider yourself a Star Trek fan?

14 33. Have you ever attended a Star Trek convention, or a Comic-Con
15 Convention, or any science fiction convention?

16 34. Have you ever bought any Star Trek merchandise?

17 35. The defendants in this case are Alec Peters and Axanar Productions,
18 Inc. Do you know Mr. Peters or Axanar Productions, Inc.?

19 36. Do you know Erin Ranahan, Diana Hughes Leiden, Kelly Oki, Brian
20 Li-A-Ping, Amy Stern, Joe Mornin, or their firm Winston and Strawn, who are the
21 attorneys for the defendants?

22 37. The plaintiffs in this case are CBS Studios Inc. and Paramount Pictures
23 Corporation. Have you or anyone close to you had any negative experience with the
24 products or services of these companies? Do you have any strong feelings, positive
25 or negative, about these companies?

26 38. Do you have any negative feelings about motion picture companies or
27 television networks in general?

28

1 39. CBS Studios and Paramount Pictures are large companies. Do you
2 think that you can treat them equally with the individual defendants, and that you
3 will not be swayed by sympathy for the “smaller guy”?

4 40. Do you know Jonathan Zavin, David Grossman, Jennifer Jason, or their
5 firm Loeb & Loeb LLP, who are the attorneys for the plaintiffs?

6 41. You may hear testimony from a number of expert witnesses. Are you
7 acquainted with or do you know anything about the following potential witnesses:

- 8 a. Christian Tregillis
- 9 b. Henry Jenkins

10 42. You may hear testimony during trial from a number of other witnesses.
11 Are you acquainted with or do you know anything about the following potential
12 witnesses:

- 13 a. Alec Peters
- 14 b. Diana Kingsbury
- 15 c. Terry McIntosh
- 16 d. Christian Gossett
- 17 e. Bill Burke
- 18 f. John Van Citters
- 19 g. Dan O’Rourke
- 20 h. Robert Meyer Burnett
- 21 i. Bill Hunt
- 22 j. Reece Watkins
- 23 k. Jonathan Lane
- 24 l. Liz Kalodner
- 25 m. Justin Lin
- 26 n. J.J. Abrams

27 43. Do you read entertainment blogs like The Hollywood Reporter? Do
28 you read “amateur” or online blogs, or listen to podcasts about Star Trek or other

1 science fiction works? Do you read any “tech” blogs, such as Tech Crunch,
2 Mashable, Giga Om, or Gizmodo?

3 44. Have you ever donated money via crowdfunding for fan fiction,
4 including on Kickstarter or Indiegogo?

5 45. Have you read or heard anything about this case?

6 46. Do you think that you are good at deciding if someone is telling the
7 truth? Do you think that you are not good at deciding if someone is telling the truth?

8 47. Do you believe that it is appropriate to make money from someone
9 else’s work?

10 48. Have you seen or heard anything that would make it hard for you to
11 guarantee that you will judge the parties equally?

12 49. Do you have strong feelings about damage awards in lawsuits? Do you
13 believe that damages should be capped at a certain level in litigation?

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15 Dated: December 30, 2016

LOEB & LOEB LLP
JONATHAN ZAVIN
DAVID GROSSMAN
JENNIFER JASON

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

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