

**EXHIBIT E TO RANAHAH DECLARATION IN
SUPPORT OF OPPOSITION TO PLAINTIFFS' MOTION
FOR PARTIAL SUMMARY JUDGMENT**

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

PARAMOUNT PICTURES)	
CORPORATION, a Delaware)	
corporation; and CBS)	
STUDIOS, INC., a Delaware)	
corporation,)	
)	Case No. 2:15-cv-09938-RGK-E
Plaintiffs,)	
)	
vs.)	
)	
AXANAR PRODUCTIONS, INC., a)	
California corporation; ALEC))	
PETERS, an individual, and)	
DOES 1-20,)	
)	
Defendants.)	
_____)	

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VIDEOTAPED DEPOSITION OF CHRISTIAN GOSSETT

Date and Time: Saturday, October 22, 2016
10:14 a.m. - 4:59 p.m.

Location: 10100 Santa Monica Boulevard, Suite 2200
Los Angeles, California

Reporter: Vicki A. Saber, CSR, RPR, CRR, CCRR, CLR
Certificate No. 6212

Job No. 8142

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1 kind of work we had been told that we would be able to
2 do on Axanar, that money should have been given to Kevin
3 immediately upon request without resistance at all, but
4 it never happened. That was a great example of all the
02:11 5 departments and the way that they were treated after
6 Prelude.

7 Q. Had you seen Mr. Peters treat people poorly in
8 his written communications?

9 MS. COORG: Objection. Form.

02:11 10 THE WITNESS: I have seen Alec Peters treat
11 people poorly. Alec Peters has treated me poorly. Alec
12 Peters -- I have seen -- I have read emails in which
13 Alec Peters has treated people poorly.

14 BY MR. GROSSMAN:

02:11 15 Q. Has anyone -- or did anyone complain to you or
16 report to you that Alec had treated them poorly in
17 written communications?

18 A. Yeah, I believe so. Yes.

19 Q. Do you recall who?

02:11 20 A. Terry McIntosh was one of them. Written
21 communication. Who else? Scott Cobb, Kevin Haney. Rob
22 Burnett and I discussed it, but that was a conversation
23 that I began. That's all I can recall at this time.

24 Q. Do you know if Alec Peters had a dispute with
02:12 25 James Cawley, the person who ran the New Voyages

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1 Q. Does this refresh your recollection? I think
2 you said it was right around May 13th of 2015 that this
3 is when you left the project?

4 A. Uh-huh.

02:44 5 Q. What else did you tell Mr. Peters about why
6 you were leaving at that time?

7 A. I specifically performed my departure in a way
8 that I had hoped would give him a bit of perspective
9 about his conduct, specifically Scott Cobb, production
02:45 10 designer, was never informed by Alec that Alec was going
11 to replace him with John Iacovelli. Scott Cobb found
12 out -- when it came down to it, Scott Cobb found out
13 because Alec posted on Facebook that the Axanar feature
14 had a new production designer and that production
02:45 15 designer was John Iacovelli. This incensed me as a long
16 time professional, someone who's worked in the industry
17 myself since I was 19 and who had been raised in the
18 presence of entertainment professionals since a child
19 since my father was a professional actor, it was a major
02:45 20 breach of etiquette not to mention decency considering
21 Scott's tireless work on the show. And so when I
22 departed -- but I was not ever -- I'm sorry, Vicki, I'm
23 going to go back. But I was never able to make this
24 clear to Alec. Alec never accepted this was a problem.
02:46 25 And so I decided that when I would leave, I would not

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1 tell him beforehand. I would just post it and see how
2 he liked it. For what it's worth, it didn't matter. He
3 didn't get it.

4 Q. And did you -- in addition to posting, I think
02:46 5 you said it was on Facebook --

6 A. Uh-huh.

7 Q. -- that you were leaving the project, did you
8 have a conversation with him about leaving the project?

9 A. Yes.

02:46 10 Q. And what did you tell him?

11 A. I told him that I was leaving to work on a
12 feature as well as other things. I was going back to
13 the professional world. I was done with him and fan
14 films.

02:46 15 Q. Did you give him any additional reasons for
16 your departure?

17 A. I may have. It was an angry and emotional
18 conversation.

19 Q. Was it in person?

02:46 20 A. It was over -- there were -- the first
21 conversation was over the phone. There were subsequent
22 conversations, but I can't recall.

23 Q. Aside from what you told him, did you have any
24 additional reasons as to why you were leaving the
02:47 25 project?

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1 THE WITNESS: It infringes a great deal.

2 BY MS. COORG:

3 Q. That wasn't precisely my question.

4 A. It wasn't a very precise question.

03:58 5 Q. In comparison to these other fan films, these
6 four or five fan films that you mentioned that you
7 reviewed, would you say that Prelude to Axanar infringes
8 any more than some of these other fan films did?

9 MR. GROSSMAN: Same objections. And object to
03:58 10 the preamble as argumentative in that question. You're
11 harassing the witness.

12 THE WITNESS: In my work on Star Wars I was
13 asked to create a timeline before that which had been
14 released by the IP holder. And in that regard I had to
03:59 15 create things that weren't there before. This was
16 licensed, of course. I was asked to do the same thing
17 on Star Trek. I was asked to create stuff that had
18 never been created before in the Star Trek universe. By
19 that definition, because of the fact that I had to do
03:59 20 more work and more creation that was unlicensed, one
21 could say that Prelude to Axanar infringes more than the
22 other fan films if we are to get philosophical about
23 things.

24 BY MS. COORG:

03:59 25 Q. I'm sorry, you just testified that you had to

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1 create more elements in making Prelude to Axanar?

2 A. Myself and Alec, yes. We had to create
3 elements of Star Trek that were not there before.

4 Q. And this, in your opinion, means that Prelude
03:59 5 to Axanar infringes more than had you just borrowed
6 everything?

7 A. It could be said.

8 Q. Okay. Do you think Prelude to Axanar
9 benefited CBS or Paramount in any way?

04:00 10 A. No.

11 Q. And why not?

12 A. Because of simple mathematics. The elements
13 of scale regarding a global branded piece of
14 entertainment compared to that of a fan film are
04:00 15 incomparable. One is irrelevant compared to that.

16 Q. And you're speaking now of the financial
17 aspect; is that right?

18 A. Financial, yes.

19 Q. What about in other ways in terms of advancing
04:00 20 brand recognition, would you say that Prelude benefited
21 CBS or Paramount in any way?

22 A. I'm reminded of a very interesting metaphor in
23 sports. There was a debate that athletes were affected
24 by the fans in the stands, the hard-core fans. And most
04:01 25 athletes agreed that they were not affected at all by