

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

GAMES WORKSHOP LIMITED,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:10-cv-08103
v.	)	
	)	
CHAPTERHOUSE STUDIOS LLC and	)	
JON PAULSON d/b/a PAULSON GAMES,	)	Judge Matthew F. Kennelly
	)	
Defendants.	)	

**DECLARATION OF JENNIFER A. GOLINVEAUX  
IN SUPPORT OF CHAPTERHOUSE STUDIOS LLC'S MOTION IN LIMINE**

I, Jennifer A. Golinveaux, declare as follows:

1. I am a partner with the law firm of Winston & Strawn LLP. I am a member in good standing of the Bar of this Court. I have personal knowledge of the facts set forth herein and if called to testify could and would do so competently.

2. Games Workshop Limited ("GW") made 11 separate document productions to Chapterhouse Studios LLC ("CHS"), Bates labeled GW0005939-11424, after the close of discovery on March 15, 2012. Specifically, GW produced new documents on April 3, April 30, May 14, May 21, May 23, May 30, July 2, July 9, August 9, August 13, August 14, and October 18, 2012.

3. Attached hereto as **Exhibit A** is a true and correct copy of GW's proposed Trial Exhibit List.

4. GW seeks to introduce some of these late-produced documents at trial. Proposed GW Trial Exhibits 15, 62, 93, 122, 125, 131-138, 217-228, 230, 235-237, 244-245, 248, 252, 255-256, 262, 264, 270-271, 273-275, 283, 294, 301, 303, 305-306, 308-309, 311, 325, 329-384, and 532-535 were produced by GW after the March 15, 2012 close of fact discovery. Of these,

Exhibits 325, 534 and 535 were produced on May 30, 2012; Exhibits 536 and 537 were produced on July 3, 2012; and Exhibits 15, 62, and 93 were produced on August 9, 2012, five days before the dispositive motion deadline. Exhibits 9, 10, 14, 16, 18, 20, 26, 27, 39, 50, 52, 57, 58, 63, 94, 96, 102, 107 (portions), 108-109, 111-115, 119, 121, 123-124, 126, 129-130, and 216 were never produced during discovery but were attached by GW for the first time to its Motion for Summary Judgment. And Exhibits 445-480 have still never been produced by GW, but are listed as exhibits it intends to introduce at trial.

5. Attached hereto as **Exhibit B** is a true and correct copy of portions of the transcript from the March 6, 2012 hearing before this Court.

6. Attached hereto as **Exhibit C** is a true and correct copy of GW's Second Rev. Copyright Claim Chart, which it served on August 3, 2012.

7. Attached hereto as **Exhibit D** is a true and correct copy of a sales summary spreadsheet attached by GW as Exhibit 145 to its summary judgment papers, which it now seeks to introduce as proposed GW Trial Exhibit 216, "GW Sales Summary."

8. Attached hereto as **Exhibit E** is a true and correct copy of a printout of sales data produced by GW at GW0011031, which it seeks to introduce as proposed GW Trial Exhibit 371, "Black Library Sales Data – 2007-08."

9. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the deposition testimony of Michael Bloch, taken July 11, 2012.

10. Attached hereto as **Exhibit G** is a true and correct copy of "Portions from the online forum Frother's Unite," which GW attached as Exhibit 39 to its summary judgment papers and seeks to introduce as proposed GW Trial Exhibit 26.

11. Attached hereto as **Exhibit H** is a true and correct copy of "Portions of the online forum Heresy-Online," which GW attached as Exhibit 23 to its summary judgment papers and seeks to introduce as proposed GW Trial Exhibit 10.

12. I have conferred with counsel for GW and confirmed that the matters addressed in CHAPTERHOUSE STUDIOS LLC'S MOTION *IN LIMINE* are in dispute.

I declare under the penalty of perjury that the foregoing is true and accurate.

Dated: November 6, 2012

By: /s Jennifer A. Golinveaux

**CERTIFICATE OF SERVICE**

I, Bryce A. Cooper, an attorney, hereby certify that on November 6, 2012, I caused to be filed electronically the foregoing DECLARATION OF JENNIFER A. GOLINVEAUX IN SUPPORT OF CHAPTERHOUSE STUDIOS LLC'S MOTION IN LIMINE with the Clerk of the Court using the CM/ECF system, which will send an electronic copy of the foregoing to counsel of record and constitutes service under Federal Rule of Civil Procedure 5(b)(2)(D) pursuant to Local Rule 5.9 of the Northern District of Illinois.

/s/ Bryce A. Cooper\_\_\_\_\_