

Before the
COPYRIGHT ROYALTY JUDGES
The Library of Congress

In the Matter of)	
)	
Distribution of the 2000-2003)	Docket No. 2008-2
Cable Royalty Funds)	CRB CD 2000-2003 (Phase II)
)	

**SETTLING DEVOTIONAL CLAIMANTS' RESPONSE TO INDEPENDENT
PRODUCERS GROUP'S MOTION REQUESTING ORDER TO COMPEL RELEASE
OF INFORMATION BY LICENSING DIVISION**

For the reasons stated in their motion for final distribution under 17 U.S.C. § 8-1(b)(3)(A), filed on July 25, 2019, the Settling Devotional Claimants disagree with Independent Producers Group's contentions that a settlement "cannot be accomplished" without the information requested from the Licensing Division, and that the SDC's motion for final distribution "might have been obviated if the Licensing Division had simply provided the requested information." IPG Motion at 3 and n. 1. The settlement has already been accomplished, and there is nothing left to be done except to order the distribution. The Licensing Division can perform the required calculation when distribution is ordered. The parties need no further information for that to happen.

That having been said, the SDC take no position on the relief requested in IPG's motion to compel release of information by the Licensing Division, or on the question as to whether the Judges would have inherent or implied statutory authority to grant the relief requested by IPG. *See, e.g., Clinton v. Goldsmith*, 526 U.S. 529, 535 (1999) (Article I court lacks jurisdiction to compel agency action beyond the scope of the court's statutory authority).

October 14, 2019

Respectfully submitted,

SETTLING DEVOTIONAL CLAIMANTS

/s/ Matthew J. MacLean

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Certificate of Service

I certify that on October 14, 2019, I caused a copy of the foregoing to be served on all parties registered to receive notice by eCRB by filing through the eCRB filing system.

/s/ Matthew J. MacLean
Matthew J. MacLean

Proof of Delivery

I hereby certify that on Monday, October 14, 2019, I provided a true and correct copy of the Response to Independent Producers Group's Motion Requesting Order to Compel Release of Information by Licensing Division to the following:

Independent Producers Group (IPG), represented by Brian D Boydston, served via Electronic Service at brianb@ix.netcom.com

Signed: /s/ Matthew J MacLean