

Before the
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In the Matter of)	
)	
Distribution of 2000, 2001, 2002)	Docket No. 2008-2 CRB CD 2000-2003
And 2003 Cable Royalty Funds)	(Phase II)
)	

**INDEPENDENT PRODUCERS GROUP'S
OPPOSITION TO THE SETTLING DEVOTIONAL CLAIMANTS'
MOTION TO STRIKE PORTIONS OF INDEPENDENT PRODUCERS GROUPS
CLAIMS AND DIRECT CASE**

Worldwide Subsidy Group LLC (a Texas limited liability company) dba Independent Producers Group ("IPG") hereby submits its opposition to the "Motion to Strike Portions of Independent Producers Group's Claims and Direct Case" filed by the Settling Devotional Claimants ("SDC").

INTRODUCTION

As sometimes occurs in the course of discovery proceedings, errors are made. In this instance, and after review of the Settling Devotional Claimants' ("SDC") motion, IPG has discovered that it unintentionally neglected to produce two documents that substantiate, respectively, IPG's agreement with Life Outreach International for 2000, and for 2001- prospectively. Life Outreach International is the underlying owner of copyright to programming that falls squarely in the Devotional Programming category, and until IPG's receipt of the SDC motion, IPG was unaware that those documents had not already been provided to the SDC.¹

¹ IPG has asserted no objections, and had no reservation about producing the subject matter agreements following entry of a protective order, and has produced all subject matter agreements without redaction of any sort. No doubt, IPG's error was simply the product of the expedited discovery schedule with which IPG and the other parties were required to comply. Moreover, by virtue of IPG having claims in three different Phase I categories, and the fact that the Phase II proceedings are being addressed *simultaneously* despite their lack of common subject matter,

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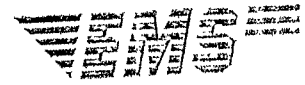


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