

Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, DC

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*In re* )  
 )  
 )  
 **DISTRIBUTION OF** ) **NO. 16-CRB-0010-SD (2014-17)**  
 **SATELLITE ROYALTY FUNDS** )  
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**JOINT OPPOSITION OF THE ALLOCATION PHASE PARTIES**  
**TO MOTION REPLY TO JUDGES ORDER 10-22-19**

The undersigned representatives of the Allocation Phase claimant categories to which Section 119 satellite royalties have been allocated in prior satellite distribution proceedings (“Allocation Phase Parties”) submit the following opposition to the “Motion Reply to Judges Order 10-22-19 To Cure Defects for Reconsideration and 5% Relief Royalty Satellite Distribution Exigent (2014-2017)” (the “Motion”) filed by David Powell, a d/b/a for Circle God Network, Inc. (“CGN”).

**Joint Opposition to Motion**

While the substance of the Motion is unclear, to the extent that the Motion, styled as a “Reply,” seeks reconsideration of the Judges’ Order of October 22, 2019 (the “Order”), the Allocation Phase Parties oppose. The Judges clearly explained that CGN failed to satisfy the criteria for reconsideration in connection with a September 28, 2019 filing, and the instant Motion similarly fails to meet that standard for reconsideration. The Allocation Phase Parties submit the Motion should be denied.

November 12, 2019

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of November, 2019, a copy of the foregoing Joint Opposition of the Allocation Phase Parties to Motion Reply was filed electronically using eCRB, which will automatically provide electronic service copies to all parties who are registered to use eCRB. *See* 37 C.F.R. § 303.6(h)(1).

*/s/ Michael Warley*

Michael Warley

# Proof of Delivery

I hereby certify that on Tuesday, November 12, 2019, I provided a true and correct copy of the Joint Opposition of the Allocation Phase Parties to Motion Reply to Judges Order 10-22-19 to the following:

Joint Sports Claimants, represented by Bryan L Adkins, served via Electronic Service at Bryan.Adkins@apks.com

Global Music Rights, LLC, represented by Scott A Zebrak, served via Electronic Service at scott@oandzlaw.com

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