

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of)
)
Distribution of)
Cable Royalty Funds)
)
In the Matter of)
)
Distribution of)
Satellite Royalty Funds)

CONSOLIDATED DOCKET NO.
14-CRB-0010-CD/SD
(2010-2013)

**MULTIGROUP CLAIMANTS' MOTION FOR SUR-REPLY TO SETTLING
DEVOTIONAL CLAIMANTS' MOTION FOR ORDER TO SHOW CAUSE**

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On January 21 2020, the Settling Devotional Claimants (“SDC”) filed their reply brief in support of the SDC’s *Motion for Order to Show Cause*. Therein, the SDC did not merely respond to the arguments raised within Multigroup Claimants’ opposition brief – in fact, the SDC failed to respond to many Multigroup Claimants arguments – but raised additional arguments NOT previously raised in the SDC’s moving brief. In fact, the SDC even go so far as to ask the Judges to delve into the May 2019 bankruptcy filing of Alfred Galaz in order to assess the veracity of specific aspects of that filing.

The newest SDC arguments are, yet again, based on false predicates alleged by the SDC and, yet again, the SDC ask the Judges to venture into areas for which the Judges are not remotely authorized to address and are beyond the Judges’ jurisdiction to even inquire.

Multigroup Claimants has much to say about the SDC’s newfound arguments, and would request an opportunity to respond thereto. For such reason, Multigroup Claimants moves the Judges for an opportunity to present a sur-reply to the SDC’s reply brief.

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CONCLUSION

For the foregoing reasons, Multigroup Claimants moves the Judges for an opportunity to present a sur-reply to the SDC's reply brief.

Respectfully submitted,

January 22, 2020

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd of January, 2020, a copy of the foregoing was sent by electronic mail to the parties listed on the attached Service List.

_____/s/_____
Brian D. Boydston, Esq.

National Association of Broadcasters (NAB) aka CTV, represented by John Stewart, served via Electronic Service at jstewart@crowell.com.

MPAA-Represented Program Suppliers (MPAA), represented by Lucy H Plovnick, served via Electronic Service at lh@msk.com.

Canadian Claimants Group, represented by Victor J Cosentino, served via Electronic Service at victor.cosentino@larsongaston.com.

SESAC Performing Rights, LLC, represented by John C. Beiter, served via Electronic Service at john@beiterlaw.com.

Public Television Claimants (PTC), represented by Ronald G. Dove Jr., served via Electronic Service at rdove@cov.com

Joint Sports Claimants (JSC), represented by Ritchie T. Thomas, served via Electronic Service at ritchie.thomas@squirepb.com.

Settling Devotional Claimants (SDC), represented by Matthew MacLean, served via Electronic Service at matthew.maclean@pillsburylaw.com.

Proof of Delivery

I hereby certify that on Wednesday, January 22, 2020, I provided a true and correct copy of the MULTIGROUP CLAIMANTS' MOTION FOR SUR-REPLY TO SETTling DEVOTIONAL CLAIMANTS' MOTION FOR ORDER TO SHOW CAUSE to the following:

Canadian Claimants Group, represented by Lawrence K Satterfield, served via Electronic Service at lksatterfield@satterfield-pllc.com

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Signed: /s/ Brian D Boydston