

Before the
COPYRIGHT ROYALTY JUDGES
The Library of Congress

In re

**DISTRIBUTION OF CABLE
ROYALTY FUNDS**

**DISTRIBUTION OF SATELLITE
ROYALTY FUNDS**

**CONSOLIDATED DOCKET NO.
14-CRB-0010-CD/SD
(2010-13)**

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

The Settling Devotional Claimants oppose Multigroup Claimants' motion for leave to file a sur-reply in opposition to the SDC's motion for an order to show cause. The only relief that the SDC have asked for is an order requiring Multigroup Claimants to show cause why it should not be disqualified as an agent. If the SDC's motion is granted, then Multigroup Claimants will be given a full opportunity to present its defense, if any. Whatever Multigroup Claimants wanted to say in sur-reply, it can say at that time.

The only "additional" argument raised in the SDC's reply that was not raised in the SDC's opening motion was the SDC's response to Multigroup Claimants' bombshell, detonated for the first time in its opposition to the SDC's motion, that Worldwide Subsidy Group, LLC has been acting under cover of Multigroup Claimants' name for more than the past two years. As shown in the exhibits to the SDC's motion, including the email exchange between counsel at Exhibit 7 and the declaration of Ms. Eva-Marie Nye at Exhibit 8, the SDC made diligent efforts to ascertain the true identity of the party who was proceeding under the name of "Multigroup Claimants." Multigroup Claimants' counsel rebuffed the SDC's efforts. *Cf. Order Granting Allocation Phase Parties' Motion for Partial Distribution of 2015 Satellite Royalties*, No. 17-

CRB-0011-SD (2015) (Nov. 7, 2018) at 6 (“[I]f MGC had any doubt about the identity of any of the Allocation Phase Parties it could simply contact the identified counsel for the party and inquire. MGC apparently did not do so. ... MGC’s lack of initiative in this regard causes the Judges to question whether MGC makes this claim in good faith.”). The SDC responded to Multigroup Claimants’ revelation at the earliest possible opportunity, in reply to the opposition in which it was first raised.

Date: January 22, 2019

Respectfully submitted,

/s/ Matthew J. MacLean

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Proof of Delivery

I hereby certify that on Wednesday, January 22, 2020, I provided a true and correct copy of the Opposition to Multigroup Claimants' Motion for Sur-Reply to Settling Devotional Claimants' Motion for Order to Show Cause to the following:

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

National Association of Broadcasters (NAB) aka CTV, represented by Ann Mace, served via Electronic Service at amace@crowell.com

MPAA-Represented Program Suppliers (MPAA), represented by Gregory O Olaniran, served via Electronic Service at goo@msk.com

Multigroup Claimants (MGC), represented by Brian D Boydston, served via Electronic Service at brianb@ix.netcom.com

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

Joint Sports Claimants (JSC), represented by Michael S Laane, served via Electronic Service at sean.laane@apks.com

Signed: /s/ Matthew J MacLean