

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of)
)
Distribution of 2000-2003)
Cable Royalty Funds)
)
_____)

DOCKET NO. 2008-2
CRB CD 2000-2003 (Phase II)

**INDEPENDENT PRODUCER GROUP’S OPPOSITION TO
SETTLING DEVOTIONAL CLAIMANTS’ MOTION TO SUPPLEMENT RECORD**

Brian D. Boydston, Esq.
PICK & BOYDSTON, LLP
2288 Westwood Blvd., Ste. 212
Los Angeles, CA 90064

Telephone: (424)293-0111
Email: brianb@ix.netcom.com

Attorneys for Independent Producers Group

On January 9, 2020, the Judges issued their *Order Granting SDC Motion for Final Distribution*, following notification in July 2019 that Independent Producers Group (“IPG”) and the Settling Devotional Claimants (“SDC”) had settled this 2000-2003 cable (Phase II) proceeding. Now, a few weeks later, the SDC seek to supplement the record in this proceeding, with pleadings filed in the 2010-2013 cable/satellite (distribution) proceeding. The premise of the SDC’s motion is that IPG has been “directly implicated in Multigroup Claimants’ potential misconduct [in the 2010-2013 proceeding].” Beyond asking that the record in *this* proceeding be supplemented with pleadings from an unrelated proceeding, the SDC assert that the allegations contained therein “raise serious concerns about [IPG’s] integrity and qualifications as an agent in copyright royalty proceedings”, and the SDC “recommend” that the Judge’s engage in “appropriate care” in effectuating their distribution.

IPG has always been a participant in the 2000-2003 cable proceedings, and Multigroup Claimants has never been a participant in the 2000-2003 cable proceedings. As best as IPG understands, IPG’s “potential misconduct” in the 2010-2013 proceedings is from IPG not informing the SDC in January 2018 that the rights held by Multigroup Claimants had been merged with those of IPG, and then ownership of that entity transferred from one individual to another. Obviously, such actions do not “raise serious concerns about [IPG’s] integrity and qualifications as an agent”. In fact, such actions are *not even relevant* thereto.

The SDC motion is for no reason other than to continue to pepper the record in every proceeding with its unsubstantiated allegations of misconduct, malfeasance, fraud, etc., as though its allegations will morph into reality. IPG and Multigroup Claimants have previously requested that the Judges articulate disfavor with this contemptible conduct, and specifically sanction the

SDC's legal counsel for this and other actions that, not only unnecessarily strain the resources of the CRB, but would be subject to sanction by any federal court.

CONCLUSION

For the reasons set forth above, the SDC motion should be denied in its entirety.

Respectfully submitted,

January 22, 2020

_____/s/_____
Brian D. Boydston, Esq.
PICK & BOYDSTON, LLP
2288 Westwood Blvd., Ste. 212
Los Angeles, CA 90064

Telephone: (424) 293-0113
Email: brianb@ix.netcom.com

Attorneys for Independent Producers Group

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.

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

Proof of Delivery

I hereby certify that on Wednesday, January 22, 2020, I provided a true and correct copy of the INDEPENDENT PRODUCER GROUP'S OPPOSITION TO SETTLING DEVOTIONAL CLAIMANTS' MOTION TO SUPPLEMENT RECORD to the following:

Settling Devotional Claimants (SDC), represented by Arnold P Lutzker, served via Electronic Service at arnie@lutzker.com

Signed: /s/ Brian D Boydston