

Before the  
**UNITED STATES COPYRIGHT ROYALTY JUDGES**  
Washington, D.C.

In the Matter of:

Determination of Rates and Terms for  
Digital Performance of Sound Recordings  
and Making of Ephemeral Copies to  
Facilitate those Performances (*Web V*)

Docket No. 19-CRB-0005-WR  
(2021-2025)

**REPLY IN SUPPORT OF MOTION TO DISMISS DAVID POWELL FOR FAILURE TO  
DEMONSTRATE A SIGNIFICANT INTEREST IN THE PROCEEDING**

On March 5, 2020, Google LLC, the National Association of Broadcasters, the National Religious Broadcasters Noncommercial Music License Committee, Pandora Media, LLC, Sirius XM Radio Inc., SoundExchange, Inc., American Federation of Musicians of the United States and Canada, Screen Actors Guild-American Federation of Television and Radio Artists, American Association of Independent Music, Sony Music Entertainment, UMG Recordings, Inc., Warner Music Group Corp., and Jagjaguwar Inc., (each, a “Participant” and collectively, the “Participants”) filed a Joint Motion to Dismiss (the “Motion”) David Powell from this proceeding. On March 11, 2020, Mr. Powell submitted his opposition to the Motion. Having reviewed Mr. Powell’s opposition, and for reasons articulated in the Motion, the Participants continue to believe that Mr. Powell and Circle God Network Inc. do not have the “significant interest” required to participate in the proceeding. 17 U.S.C. § 803(b)(2)(C); 37 C.F.R. § 351.1(c). Accordingly, the Participants respectfully request that the Judges dismiss Mr. Powell (and Circle God Network Inc.) from this proceeding.

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# Proof of Delivery

I hereby certify that on Wednesday, March 18, 2020, I provided a true and correct copy of the Reply in Support of Motion to Dismiss David Powell for Failure to Demonstrate a Significant Interest in the Proceeding to the following:

Educational Media Foundation, represented by David Oxenford, served via Electronic Service at doxenford@wbklaw.com

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