

Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, D.C.

In the Matter of	)	
	)	
Distribution of	)	CONSOLIDATED DOCKET NO.
<u>Cable Royalty Funds</u>	)	14-CRB-0010-CD/SD
	)	(2010-2013)
In the Matter of	)	
	)	
Distribution of	)	
<u>Satellite Royalty Funds</u>	)	

**MULTIGROUP CLAIMANTS’ EMERGENCY MOTION TO  
EXPAND BRIEFING LIMITS AND RESPONSE DATE**

Multigroup Claimants hereby submits its *Emergency Motion to Expand Briefing Limit and Response Date*.

Pursuant to the Judges’ March 2, 2020, *Order for Further Briefing In Response to Order to Show Cause*, Multigroup Claimants was limited to a reply brief of ten pages, or 2500 words. Multigroup Claimants reply brief is due March 23, 2020.

As the Judges are now likely aware, in its response brief, the SDC submitted a brief of almost twenty pages, which includes an appendix of thirty documents comprising 721 pages, and no fewer than five original declarations authored by SDC personnel regarding such matters. The SDC response and the attached

appendix addresses subjects far beyond the topics addressed in either the Judges' order or Multigroup Claimants' filing, including (i) the submission and analysis of "handwriting exemplars" and a "handwriting analysis", (ii) documents filed in connection with the transfer and/or renovation of two real properties in Florida, and (iii) entire deposition transcripts taken from litigation that does not involve Multigroup Claimants, etc. The SDC further attempt to relitigate matters already addressed by the Judges (e.g., IPG's dispute with Bob Ross, Inc.), and attach documents relating thereto. With rare exception, and despite their known existence long prior, none of the foregoing documents appeared as part of the SDC's *Motion for Order to Show Cause* (filed December 26, 2020). They are, in standard parlance, the product of "sandbagging".

Multigroup Claimants believes that the vast bulk of the SDC's arguments and documents are facially irrelevant, and were included for purposes other than addressing the issues addressed in either the Judges' *Order to Show Cause* or Multigroup Claimants' filing. Nevertheless, in an abundance of caution, Multigroup Claimants requests that the Judges allow Multigroup Claimants the breadth to respond in more than a cursory manner, and be provided additional briefing and response limits in order to do so. Any delay in the submission of

Multigroup Claimants' reply brief results in no prejudice to any party other than Multigroup Claimants.

### **CONCLUSION**

For the foregoing reasons Multigroup Claimants moves the Judges for an order modifying the Judges' *Order to Show Cause*, and allowing Multigroup Claimants' reply brief be submitted Monday, March 30, 2020 or subsequent, and that the briefing limits be expanded to twenty pages.

Respectfully submitted,

Dated: March 18, 2020

\_\_\_\_\_/s/\_\_\_\_\_  
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Attorneys for Independent  
Producers Group

## CERTIFICATE OF SERVICE

I hereby certify that on this 18th of March, 2020, a copy of the foregoing was filed with the eCRB system, and therefore 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](mailto:jstewart@crowell.com).

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

Canadian Claimants Group, represented by Victor J Cosentino, served via Electronic Service at [victor.cosentino@larsongaston.com](mailto:victor.cosentino@larsongaston.com).

SESAC Performing Rights, LLC, represented by John C. Beiter, served via Electronic Service at [john@beiterlaw.com](mailto:john@beiterlaw.com).

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

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

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

# Proof of Delivery

I hereby certify that on Wednesday, March 18, 2020, I provided a true and correct copy of the MULTIGROUP CLAIMANTS' EMERGENCY MOTION TO EXPAND BRIEFING LIMITS AND RESPONSE DATE to the following:

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

Joint Sports Claimants (JSC), represented by Daniel A. Cantor, served via U.S. Mail

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

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

Settling Devotional Claimants (SDC), represented by Benjamin S Sternberg, served via Electronic Service at ben@lutzker.com

Signed: /s/ Brian D Boydston