

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of)	
)	
Distribution of 2000, 2001, 2002)	Docket No. 2008-2 CRB CD
And 2003 Cable Royalty Funds)	2000-2003 (Phase II) (Second
)	Remand)
_____)	

**INDEPENDENT PRODUCERS GROUP’S
RESPONSE TO JUDGE’S ORDER DIRECTING
PARTIES TO REVIEW CALCULATIONS OF
APPORTIONMENT OF ACCRUED INTEREST**

On May 1, 2020, the Judges issued their *Order Directing Parties to Review Calculations of Apportionment of Accrued Interest*, requesting that the parties identify any information that they propose be redacted from the public version of their order.

Consistent with IPG’s prior pleadings, e.g., *Opposition to Settling Devotional Claimants’ Motion for Final Distribution under 17 U.S.C. § 801(b)(3)(A)* and *Motion for Sanctions* (filed Aug. 5, 2019), IPG contends that the agreement it entered into with the Settling Devotional Claimants for distribution of 2000-2003 cable royalties for the devotional programming category was confidential. As set forth in IPG’s prior pleadings, such

position was based on the explicit communications between the parties, including emails drafted by the SDC's own hand, and emails drafted by IPG. Id., citing Exhs. 1-4 to *Settling Devotional Claimants' Motion for Final Distribution under 17 U.S.C. § 801(b)(3)(A)*(filed July 25, 2019). Despite such representations by both parties, the SDC elected to disregard those communications, and even include SDC-authored communications that conspicuously reflected the phrase "CONFIDENTIAL SETTLEMENT COMMUNICATION".

For the foregoing reasons, IPG maintains that any portion of the Judges' order that reflects the percentages allocated to the parties, including that portion referencing the Judges' public order of January 9, 2020, including the entirety of Exhibit A, be redacted from the public version of the Judges' current order.

Respectfully submitted,

Dated: May 4, 2020

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on this May 4, 2020, a copy of the foregoing was electronically filed and served on the following parties via the eCRB system.

_____/s/_____
Brian D. Boydston

DEVOTIONAL CLAIMANTS:

Matthew MacLean
Michael Warley
Jessica Nyman
Pillsbury, Winthrop, et al.
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Proof of Delivery

I hereby certify that on Monday, May 04, 2020, I provided a true and correct copy of the Independent Producers Group's Response To Judge's Order Directing Parties To Review Calculations Of Apportionment Of Accrued Interest to the following:

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

Signed: /s/ Brian D Boydston