

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>)	

**RYAN GALAZ’S DECLARATION IN SUPPORT OF
WORLDWIDE SUBSIDY GROUP LLC’S
MOTION FOR SUBSTITUTION OF PARTIES**

I, RYAN GALAZ, declare and state as follows:

1. I submit this declaration in support of Worldwide Subsidy Group, LLC’s *Motion for Substitution of Parties*. The following facts are within my personal knowledge, and if called upon I could and would testify competently thereto.

2. I am the principal and sole owner of Worldwide Subsidy Group, LLC, a Texas limited liability company (“WSG”). Multigroup Claimants was a sole proprietorship of Alfred Galaz. As set forth in prior briefing, on December 31, 2017, Alfred Galaz and Ruth Galaz collectively transferred 100% of the ownership in WSG to me. Almost simultaneously, on January 1, 2018, Alfred Galaz transferred 100% of the interests held by Multigroup Claimants to me. Consequently, as of January 1, 2018, there was a comprehensive commonality of ownership by me of all interests held by WSG and Multigroup Claimants.

3. Because the near-simultaneous conveyances created a commonality of interest and ownership, and because Multigroup Claimants had always been engaged in the pursuit of the same type royalties as WSG, on behalf of the same copyright claimants and only pursuant to rights acquired from WSG, I concluded that there was no longer a reason to conduct the business of WSG and Multigroup Claimants separately. Therefore, upon my acquisition, I transferred those rights and interests previously held by Multigroup Claimants back to WSG (which rights had themselves originally been transferred to Multigroup Claimants *from* WSG).

4. As a result, following the transfers of December 31, 2017 and January 1, 2018, that are referenced above, all the rights and interests of WSG, and those previously held by Multigroup Claimants, have been held exclusively by WSG, which is wholly owned by me. WSG's continued use of "Multigroup Claimants" as a fictitious business name, no different than WSG's use of "Independent Producers Group" and "Spanish Language Producers" as fictitious business names, was for no reason other than the demarcation and identification of the different rights pools being pursued (or intended to be pursued) by WSG.

5. WSG and I have previously characterized this as a "merging" of all interests into WSG. This merging was not by "operation of law", nor did WSG or I ever suggest it to be. Rather, it was a "merging" according to my personal election. I did not memorialize my placement of Multigroup Claimants' interests into WSG, i.e., my "transfer" of Multigroup Claimants' interests back to WSG, nor did I need to do so for my own personal accounting purposes. Rather, it was a "transfer" that occurred within my mind that had no consequence on either WSG's or Multigroup Claimants' contractual obligations, and was never considered to be

of any significant legal consequence. It was a “transfer” of interests, “out of one pocket, and into the other”, which I hereby affirm.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 21st day of June, 2020, in Everett, Massachusetts.



Ryan Galaz

Proof of Delivery

I hereby certify that on Monday, June 22, 2020, I provided a true and correct copy of the Ryan Galaz's Declaration In Support Of Worldwide Subsidy Group Llc's Motion For Substitution Of Parties to the following:

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

Joint Sports Claimants (JSC), represented by Michael E Kientzle, served via ESERVICE at michael.kientzle@apks.com

Public Television Claimants (PTC), represented by Dustin Cho, served via ESERVICE at dcho@cov.com

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

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

National Association of Broadcasters (NAB) aka CTV, represented by John Stewart, served via ESERVICE at jstewart@crowell.com

Signed: /s/ Brian D Boydston