

Before the
Copyright Royalty Judges
Washington, D.C.

_____)	
In the Matter of)	
)	
Distribution of)	Docket No. 2008-2 CRB CD
2000-2003)	2000-2003 (Phase 2)
Cable Royalty Funds)	
_____)	

**INDEPENDENT PRODUCERS GROUP’S MOTION FOR LEAVE TO
FILE RESPONSE TO SDC’S COMMENTS TO IPG’S MOTION FOR
PARTIAL DISTRIBUTION OF 2000-2003 CABLE ROYALTIES**

Worldwide Subsidy Group LLC (a Texas limited liability company)
dba Independent Producers Group ("IPG") hereby submits its *Motion for
Leave to File Response to Settling Devotional Claimants’ Comments to
IPG’s Motion for Partial Distribution of 2000-2003 Cable Royalties.*

On April 1, 2019, the Judges issued a notice requesting comments to
IPG’s motion for partial distribution of royalties, originally filed on April 21,
2017. 84 Fed. Reg. 12295 (April 1, 2019). Therein, the Judges requested
comments be filed no later than May 1, 2019. One party filed comments in
response thereto, the Settling Devotional Claimants (“SDC”).

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Notwithstanding, the Judges made no pronouncement whether IPG would be entitled to file a response thereto. While many of the arguments made by the SDC are identical to those presented in an opposition brief that was filed on April 26, 2017, and cited in the *Federal Register* notice, several are new. Absent an opportunity to respond, IPG would have no opportunity to address the SDC's arguments.

For the foregoing reason, IPG requests leave to file the attached *Response to Settling Devotional Claimants' Comments to IPG's Motion for Partial Distribution of 2000-2003 Cable Royalties*.

Respectfully submitted,

Dated: May 10, 2019

_____/s/_____

Brian D. Boydston, Esq.
California State Bar No. 155614

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Group

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of May, 2019, a copy of the foregoing was electronically filed in eCRB and served on the attached Service List.

_____/s/_____
Brian D. Boydston, Esq.

DEVOTIONAL CLAIMANTS:

Matthew J. MacLean
Michael A. Warley
Jessica T. Nyman
Pillsbury, Winthrop, et al.
1200 17th St., NW
Washington, D.C. 20036

Proof of Delivery

I hereby certify that on Friday, May 10, 2019 I provided a true and correct copy of the INDEPENDENT PRODUCERS GROUP'S MOTION FOR LEAVE TO FILE RESPONSE TO SDC'S COMMENTS TO IPG'S MOTION FOR PARTIAL DISTRIBUTION OF 2000-2003 CABLE ROYALTIES to the following:

Settling Devotional Claimants (SDC), represented by Michael A Warley served via Electronic Service at michael.warley@pillsburylaw.com

MPAA, represented by Lucy H Plovnick served via Electronic Service at lhp@msk.com

Signed: /s/ Brian D Boydston