

Before the
UNITED STATES COPYRIGHT ROYALTY JUDGES
Library of Congress
Washington, D.C.

In re

DETERMINATION OF ROYALTY
RATES AND TERMS FOR
EPHEMERAL RECORDING AND
DIGITAL PERFORMANCE OF SOUND
RECORDINGS (*WEB IV*)

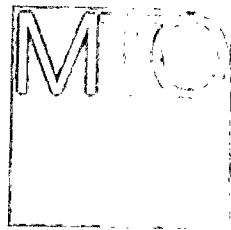
DOCKET NO. 14-CRB-0001-WR
(2016-2020)

**SOUNDEXCHANGE’S THIRD SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS TO THE LICENSEE PARTICIPANTS**

Pursuant to 17 U.S.C. § 803(b)(6)(C)(v) and 37 C.F.R. § 351.5(b)(1), SoundExchange, Inc. serves this Third Set of Requests for Production of Documents on the Licensee Participants. These Requests are continuing in nature and may require supplementation.

DEFINITIONS AND INSTRUCTIONS

1. The present tense shall be construed to include the past and future tenses and the past and future tenses shall be construed to include the present tense as required by the context to elicit all information discoverable within the broadest scope of these document requests.
2. The singular shall be construed to include the plural and the plural shall be construed to include the singular as required by the context to elicit all information discoverable within the broadest scope of these document requests.
3. “And” and “or” have both conjunctive and disjunctive meanings as required by the context to elicit all information discoverable within the broadest scope of these document requests.
4. “Any” and “all” shall mean “each and every.”



Munger, Tolles & Olson LLP

- (1) SoundExchange's Motion to Compel iHeart Media to Produce Documents in Response to SoundExchange's Document Requests,
- (2) SoundExchange's Motion to Compel The National Association of Broadcasters to Produce Documents Responsive to SoundExchange's Requests
- (3) SoundExchange's Motion to Compel Pandora Media, Inc. to Produce Documents Responsive to SoundExchange's Requests and Declaration of Rose Leda Ehler

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