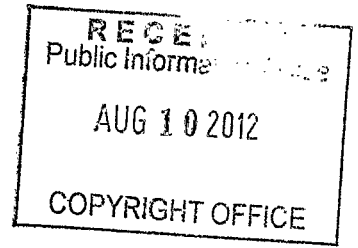


Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.



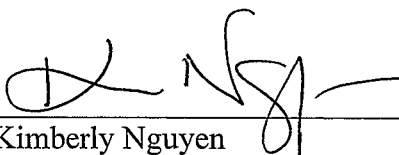
_____))
In the Matter of))
))
Distribution of the 2000, 2001,))
2002, and 2003 Cable Royalty Funds))
_____))

Docket No. 2008-2 CRB CD 2000-2003
(Phase II)

AFFIDAVIT ACCOMPANYING REDACTED RESTRICTED INFORMATION

Pursuant to 37 C.F.R. § 350.4(e) and Paragraph 11(b) of the Protective Order entered by the Copyright Royalty Judges (“Judges”) on July 10, 2012, the undersigned hereby submits this affidavit in support of the redacted version of MPAA-represented Program Suppliers’ Reply to Independent Producers Group’s Opposition to MPAA Motion to Compel Production of Underlying Documents from Independent Producers Group (“Reply”), filed with the Judges on August 9, 2012. The undersigned hereby represents that (i) she is authorized to submit this affidavit on behalf of the MPAA-represented Program Suppliers; (ii) she has reviewed the redactions set forth in the Redaction Log attached hereto as Exhibit 1; and (iii) to the best of her knowledge, information and belief, and based on the attached declaration submitted by Denise Vernon in support of the restricted documents whose contents were incorporated to the documents that are the subject of this Affidavit, the redacted information meets the definition of Restricted information at the time this Affidavit was made, and good cause exists for the treatment of the information as Protected Materials.

Executed this 10th day of August, 2012, in Washington, D.C.



Kimberly Nguyen

EXHIBIT 1

REDACTION LOG ACCOMPANYING MPAA-REPRESENTED PROGRAM SUPPLIERS'
AUGUST 9, 2012 REPLY

The redactions on pages 10 and 17 of MPAA-represented Program Suppliers' August 9, 2012 Reply contain quoted language from email correspondence and a chart that Independent Producers Group ("IPG") produced to MPAA-represented Program Suppliers and designated as RESTRICTED documents subject to the Judges' Protective Order in this proceeding. IPG submitted the attached declaration of Denise Vernon in support of such designation.

The redacted material in Exhibit B of MPAA-represented Program Suppliers' August 9, 2012 Reply contains a copy of email correspondence that IPG produced to MPAA-represented Program Suppliers and designated as a RESTRICTED document subject to the Judges' Protective Order in this proceeding. IPG submitted the attached declaration of Denise Vernon in support of such designation.

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

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

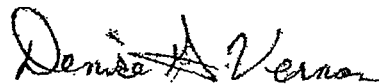
DECLARATION OF DENISE VERNON

I, DENISE VERNON, swear under penalty of perjury, that the following is true and correct:

1. My name is Denise Vernon. I am over twenty-one (21) years of age, and am competent to sign this Declaration. I am a member of Worldwide Subsidy Group LLC, dba Independent Producers Group ("IPG").

2. Any and all documents and information that IPG has deemed "RESTRICTED" is commercial or financial information that IPG has reasonably determined in good faith, if disclosed, would either competitively disadvantage IPG, or provide a competitive advantage to another party, or is subject to a prior-existing confidentiality agreement.

DATED: July 16, 2012



DENISE VERNON

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of August, 2012, a copy of the foregoing document was sent by Federal Express overnight mail to the parties listed on the attached service list.



Kimberly Nguyen

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