

Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, D.C.

In the Matter of	)	
	)	
Distribution of 2004, 2005, 2006,	)	Docket No. 2012-6 CRB CD
2007, 2008 and 2009 Cable	)	2004-2009 (Phase II)
Royalty Funds	)	
In the Matter of	)	
	)	
Distribution of 1999-2009 Satellite	)	Docket No. 2012-7 CRB SD
Royalty Funds	)	1999-2009 (Phase II)
	)	

**INDEPENDENT PRODUCERS GROUP'S NOTICE REGARDING  
WRITTEN REBUTTAL STATEMENTS PENDING RESOLUTION  
OF *WORLDWIDE SUBSIDY GROUP V. HAYDEN***

Worldwide Subsidy Group LLC (a Texas limited liability company)  
dba Independent Producers Group ("IPG") hereby submits the following  
statement regarding the filing of written rebuttal statements in the above-  
referenced proceeding.

On December 8, 2017, Worldwide Subsidy Group LLC dba  
Independent Producers Group ("WSG") filed a complaint in the U.S. District  
Court for the District of Columbia relating to the above proceeding, and in  
connection therewith filed a motion for a temporary restraining order that  
would stay the above proceeding. Both the MPAA and the SDC were

**INDEPENDENT PRODUCERS GROUP'S STATEMENT REGARDING WRITTEN REBUTTAL  
STATEMENTS PENDING RESOLUTION OF WORLDWIDE SUBSIDY GROUP V. HAYDEN**

provided courtesy copies of the various pleadings upon their filing with the U.S. District Court prior to formal service of those documents, in order to provide all parties ample opportunity to address such filings. On December 11, 2017, WSG additionally filed a motion to stay such proceeding with the Copyright Royalty Board, which was served on both the MPAA and the SDC.

WSG is now awaiting contact from the U.S. District Court as to when a hearing on its motion for temporary restraining order will go forward. In light of the fact that this proceeding will likely be mooted by WSG's action in U.S. District Court or WSG's motion for a stay to the CRB, WSG has elected to not file a written rebuttal statement in the foregoing proceeding that would otherwise be filed on December 15, 2017. In order to avoid any accusation that WSG sought to have the adverse parties "show their hand", on December 14, 2017, WSG informed such adverse parties that WSG would not challenge any delayed filing of a written rebuttal statement by either the MPAA or SDC pending a determination by the U.S. District Court as to whether a temporary restraining order will issue, or a ruling by the CRB on WSG's motion for a stay.

Respectfully submitted,

Dated: December 15, 2017

\_\_\_\_\_/s/\_\_\_\_\_  
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Attorneys for Independent Producers  
Group

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of December, 2017, a copy of the foregoing was sent by email to the parties listed on the attached Service List, and served by the eCRB system.

\_\_\_\_\_/s/\_\_\_\_\_  
Brian D. Boydston, Esq.

### **DEVOTIONAL CLAIMANTS:**

Clifford M. Harrington  
Matthew J. MacLean  
Victoria N. Lynch  
Pillsbury, Winthrop, et al.  
P.O. Box 57197  
Washington, D.C. 20036-9997

### **MPAA-REPRESENTED PROGRAM SUPPLIERS:**

Gregory O. Olaniran, Esq.  
Lucy Holmes Plovnick Esq.  
Mitchell, Silberberg & Knupp LLP  
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Washington, D.C. 20036

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## Certificate of Service

I hereby certify that on Friday, December 15, 2017 I provided a true and correct copy of the Independent Producers Group's Notice Regarding Written Rebuttal Statements Pending Resolution Of Worldwide Subsidy Group V. Hayden to the following:

MPAA-Represented Program Suppliers, represented by Lucy H Plovnick served via Electronic Service at [lh@msk.com](mailto:lh@msk.com)

Devotional Claimants, represented by Michael A Warley served via Electronic Service at [michael.warley@pillsburylaw.com](mailto:michael.warley@pillsburylaw.com)

Signed: /s/ Brian D Boydston