

REDACTED PUBLIC VERSION

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

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

MPA SUPPLEMENTAL RESPONSE TO ORDER DIRECTING RECALCULATION OF ROYALTY ALLOCATIONS IN THE DEVOTIONAL CATEGORY AND SEEKING ADDITIONAL GUIDANCE

The Motion Picture Association, Inc. (“MPA”), as the 2000-2003 cable Program Suppliers category representative, submits the following supplemental response to the Copyright Royalty Judges’ (“Judges”) August 28, 2020 *Order Directing Recalculation Of Royalty Allocations In The Devotional Category And Seeking Additional Guidance* (“August 28 Order”), as permitted by the Judges. *See Order Granting MPA-Represented Program Suppliers And Joint Sports Claimants Leave To File Supplemental Responses To August 28 Order* at 2 (September 24, 2020).¹

MPA has now reviewed the Licensing Division’s appendix to the Judges’ May 1 Order (“LD Appendix”), and has identified several issues with the document that should be corrected before any final distribution is made in the Devotional category. As an initial matter, MPA

¹ On September 18, 2020, MPA filed a preliminary response to the August 28 Order, pointing out that, as of the date of that filing, MPA had not been permitted access to the restricted appendix to the Judges’ restricted *Order Directing Parties To Review Calculations Of Apportionment Of Accrued Interest* (May 1, 2020) (“May 1 Order”), and were thus unable to evaluate the issues on which the Judges had sought comment. On September 23, 2020, counsel for the Settling Devotional Claimants (“SDC”) disclosed the restricted appendix to MPA and Joint Sports Claimants (“JSC”). On October 5, 2020, MPA and JSC notified the Judges that they had not identified any restricted information in the restricted appendix. *See MPA And JSC Notice Regarding Restricted Appendix To May 1 Order* at 1 (October 5, 2020). Following that filing, the Judges filed a public version of their May 1 Order and its appendix in this proceeding on October 5, 2020, without redactions.

agrees with SDC and the Judges that the LD Appendix must be revised to reflect the 2003 partial distribution amount received by SDC, which was omitted from the calculations.² However, MPA has discovered two additional issues – relating to attribution of royalty shares to Program Suppliers and the Devotional Claimants – with the LD Appendix that must also be addressed by the Licensing Division before a final distribution should occur in the Devotional category as to the 2000-2003 cable royalty funds.

First, MPA discovered that in determining the dollar value shares attributed to the Devotional category in the LD Appendix, the Licensing Division did not apply the confidential Allocation Phase settlement percentage shares of the 2000-2003 cable royalty funds for the Devotional category that the Phase I Parties (including SDC) disclosed to the Judges on August 14, 2015. *See Joint Response Of The Phase I Parties To IPG's Motion For Final Distribution Of 2000, 2001, 2002, And 2003 Cable Royalty Funds In The Program Suppliers Category* at 2 (August 14, 2015) (Restricted) (“Joint Response”), attached hereto as Exhibit A. Indeed, the 2000-2003 cable confidential Allocation Phase settlement shares for the Devotional category do not appear in the LD Appendix *at all*,³ and no attempt appears to have been made by the Licensing Division to apply the confidential Allocation Phase settlement shares set forth in the Joint Response in the course of calculating the final distribution awards for the Devotional category in this proceeding. Instead, the Licensing Division, perhaps inadvertently, assumed incorrectly that all of the funds on reserve were attributable exclusively to the Devotional category, and simply used the balance of the fund reserves and the partial distribution amounts

² MPA understands that the Judges have already directed the Licensing Division to revise the LD Appendix to correct this issue. *See August 28 Order* at 3-4.

³ If the confidential settlement percentage shares for 2000-2003 cable for the Devotional category had appeared in the restricted LD Appendix, MPA would have requested that the confidential settlement shares be redacted from the public version of the document, as required by the Phase I Parties' settlement agreements.

SDC received as the starting point for determining the final distribution dollar shares to be awarded in the Devotional category, and interest.

The net effect of the Licensing Division's approach is that the LD Appendix significantly overstates the dollar value due to the Devotional category for 2000 through 2003 under the Allocation Phase settlement, the most significant of which is the over-attribution of more than \$1 million dollars on reserve to the Devotional category in excess of its agreed Allocation Phase settlement share.⁴ The Devotional category is not entitled to receive funds in excess of its agreed 2000-2003 cable settlement shares, and the Judges should not permit either SDC or Independent Producers Group ("IPG") (as a Devotional category claimant) to receive royalties as a part of its final distribution that are not properly attributable to the Devotional category. In order to resolve this problem, the Licensing Division should revise the LD Appendix to reflect the dollar shares attributable *only* to the Devotional category for 2000-2003 cable based on the confidential settlement shares for the Devotional category that were disclosed in the Joint Response. *See* Joint Response, Exhibit A at 2.

Second, by failing to follow the instructions provided in the Joint Response regarding the percentages of the remaining 2000-2003 cable royalty funds that the Phase I Parties agreed should be held on reserve for the Devotional category when Program Suppliers received their final distribution of 2000-2003 cable royalties, the Licensing Division shortchanged the Program Suppliers category in its final distribution to Program Suppliers. Specifically, in the Joint Response, the Phase I Parties notified the Judges of their agreement that the following percentages of the 2000-2003 cable royalties remaining on deposit as of June 30, 2015 should be held on reserve for the Devotional category pending resolution of further proceedings, while all

⁴ *See* August 28 Order at 2.

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other 2000-2003 cable royalties held on reserve should be distributed to the Program Suppliers category:

Cable Year	Reserve Funds as of June 30, 2015⁵	Devotional Claimants % Share of Reserve Funds
2000	\$ 5,476,469.25	14.47358%
2001	\$ 4,154,512.18	18.98232%
2002	\$ 5,960,567.42	13.78931%
2003	\$ 5,912,206.89	14.07237%

See Joint Response at 3.

It is clear from examining the LD Appendix that the Licensing Division did not implement the Phase I Parties' agreement regarding the reserve funds as presented in the Joint Response. Instead, when distributing royalties for the Program Suppliers category on April 14, 2016, it appears that the Licensing Division held too much on reserve for the Devotional category for the 2000 cable royalty year, and distributed too much to the Program Suppliers category for the 2001-2003 cable royalty years. In the August 28 Order, the Judges indicated that SDC calculated these discrepancies in the amounts on reserve as follows:

2000: \$1,083,560.34 (too much available)
2001: \$8,561.64 (not enough available)
2002: \$13,053.95 (not enough available)
2003: \$216,347.71 (not enough available)

See August 28 Order at 2.

MPA performed its own independent calculations using information in the LD Appendix and the Joint Response and arrived at nearly identical dollar amounts for the discrepancies identified

⁵ These fund totals were taken from the Licensing Division's Growth In The Copyright Royalty Funds Report dated June 30, 2015, a copy of which is attached hereto as Exhibit B.

above to the ones calculated by SDC.⁶ MPA was unable to perform these calculations previously because the Licensing Division did not supply MPA with a worksheet in connection with the 2000-2003 cable royalty distribution that MPA received on April 14, 2016, despite multiple email requests from MPA for such a worksheet.

Clearly, the Licensing Division did not implement the Phase I Parties' agreement set forth in the Joint Response regarding the allocation of the 2000-2003 cable royalty funds remaining on reserve between the Program Suppliers and Devotional categories. Consequently, there was a net underpayment to Program Suppliers in its final distribution (and a corresponding net over-attribution to the Devotional category across 2000 through 2003). In order to resolve this issue, the Licensing Division would need to recalculate the LD Appendix so that the Phase I Parties' agreement regarding the allocation of the 2000-2003 cable royalties remaining on reserve as of August 14, 2015 is implemented. This will require the Licensing Division to distribute an additional \$1,083,560.34 from the 2000 cable royalty fund to the Program Suppliers category (divided between MPA and IPG pursuant to the 2000 cable Phase II shares for the Program Suppliers category determined by the Judges),⁷ and to require a repayment from the Program Suppliers category to recover the excess amounts that were distributed to the Program Suppliers category for 2001-2003 cable. *See* August 28 Order at 2-3. MPA submits that "Option 2" in the Judges' August 28 Order is the most efficient way to accomplish the necessary further distributions and repayments for the Program Suppliers category, *see id.*, however MPA defers to

⁶ MPA's independent calculations of the dollar amounts of the reserve discrepancies is attached hereto as Exhibit C. As the Judges can see from reviewing Exhibit C, MPA's calculations resulted in the same dollar figures SDC calculated for all royalty years other than 2000, where MPA's calculations vary from SDC's by only \$0.54. MPA expects that this small difference is likely a rounding issue, and is willing to accept SDC's calculation of the discrepancy amount for 2000.

⁷ *See* 78 Fed. Reg. 64984, 64984 (October 30, 2013).

the Judges and the Licensing Division regarding the appropriate procedure to effect this reconciliation.⁸

Respectfully submitted,

Dated: October 9, 2020

**MPA-REPRESENTED PROGRAM
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⁸ MPA has reviewed JSC's response to the Judges' August 28 Order, and agrees with JSC that SDC's proposal that the Judges perform a full accounting of all 2000-2003 cable amounts previously distributed to all of the Allocation Phase categories is not warranted for all of the reasons explained by JSC. *See Joint Sports Claimants' Response To Order Granting MPA-Represented Program Suppliers And Joint Sports Claimants Leave To File Supplemental Responses To August 28 Order* at 1-4 (October 9, 2020).

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CERTIFICATE OF SERVICE

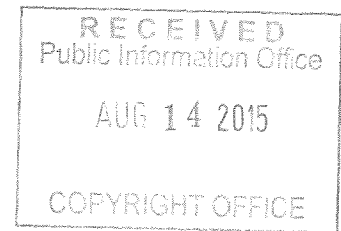
I certify that on October 9, 2020, I caused a copy of the foregoing to be served on all parties registered to receive notice by eCRB by filing through the eCRB filing system.

/s/ Lucy Holmes Plovnick

Lucy Holmes Plovnick

EXHIBIT A

REDACTED PUBLIC VERSION



Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

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

**JOINT RESPONSE OF THE PHASE I PARTIES
TO IPG’S MOTION FOR FINAL DISTRIBUTION OF 2000, 2001, 2002, AND 2003
CABLE ROYALTY FUNDS IN THE PROGRAM SUPPLIERS CATEGORY**

On July 28, 2015, Independent Producers Group (“IPG”) filed a motion (“IPG Motion”) seeking final distribution of 2000, 2001, 2002, and 2003 cable royalty funds (“2000-2003 Funds”). The IPG Motion followed the U.S. Court of Appeals for the District of Columbia Circuit’s June 30, 2015 decision affirming the Copyright Royalty Judges’ (“Judges”) final determination in this proceeding with respect to the Program Suppliers’ category. *Independent Producers Group v. Librarian of Congress*, No. 13-1274, et al., 2015 U.S. App. LEXIS 11166 (D.C. Cir. 2015). The Program Suppliers, Joint Sports Claimants, Commercial Television Claimants, Music Claimants, Canadian Claimants Group, Public Television Claimants, Devotional Claimants, and National Public Radio (“NPR”) (collectively, “Phase I Parties”) hereby advise that the Judges that they have no opposition to the IPG Motion.

In order to facilitate the final distribution of 2000-2003 Funds in the Program Suppliers category sought by the IPG Motion, the Phase I Parties hereby disclose to the Judges (subject to the Protective Order entered in this Phase II proceeding) the confidential Phase I settlement shares for the Program Suppliers and Devotional Phase I categories for each of the 2000-2003

Funds for each royalty year after removing the funds NPR received in final distribution for each royalty year.¹

Program Suppliers' Confidential Phase I Share Of 2000-2003 Cable Royalty Funds			
Cable Year	Basic Fund	3.75% Fund	Syndex Fund
████	██████████	██████████	██████████
████	██████████	██████████	██████████
████	██████████	██████████	██████████
████	██████████	██████████	██████████

Devotional Claimants' Confidential Phase I Share Of 2000-2003 Cable Royalty Funds			
Cable Year	Basic Fund	3.75% Fund	Syndex Fund
████	██████████	██████████	██████████
████	██████████	██████████	██████████
████	██████████	██████████	██████████
████	██████████	██████████	██████████

The Phase I Parties further advise the Judges that the portion of the 2000-2003 Funds held in reserve by the Licensing Division of the Copyright Office should be allocated as follows

¹ NPR settled with the other Phase I Parties and received final distribution of the 2000, 2001 and 2002 cable royalty funds on April 19, 2007, and of the 2003 cable royalty fund on February 29, 2008. See Order, Docket Nos. 2001-8 CARP CD 98-99, 2002-8 CARP CD 2000, 2003-2 CARP CD 2001, 2004-5 CARP CD 2002, at 6 (April 3, 2007); Order Granting Partial Distribution of 2003 Cable Royalty Fund, Docket No. 2005-4 CRB CD 2003 at 2 (Jan. 23, 2008).

among MPAA-represented Program Suppliers, IPG-represented Program Suppliers, and the Devotional Claimants.:

Percentage Allocations Of Reserve Funds Available For Distribution (“Reserve Funds”) As Of June 30, 2015				
Cable Year	Reserve Funds as of June 30, 2015	MPAA-Program Suppliers % Share Of Reserve Funds	IPG-Program Suppliers % Share Of Reserve Funds	Devotional Claimants % Share Of Reserve Funds
2000	\$ 5,476,469.25	75.32265%	10.20376%	14.47358%
2001	\$ 4,154,512.18	77.42350%	3.59418%	18.98232%
2002	\$ 5,960,567.42	83.17636%	3.03433%	13.78931%
2003	\$ 5,912,206.89	83.89213%	2.03550%	14.07237%

The percentage allocation of the Reserve Funds identified above represents the full amount of IPG’s Program Suppliers’ royalty share for each of the 2000-2003 Funds, and the percentage of both MPAA and the Devotional Claimants’ royalty shares remaining undistributed following previous partial distributions.² The Phase I Parties respectfully request that the Judges distribute the Program Suppliers’ percentages of the Reserve Funds identified above to MPAA and IPG, and continue holding the percentages attributable to the Devotional Claimants in reserve until all appeals addressing the Judges’ Final Determination as to the Phase I Devotional category are fully resolved.

² IPG’s share of the Reserve Funds is higher than its Phase II award because IPG did not receive any partial distribution within the Program Suppliers category.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of August, 2015, a copy of the foregoing pleading, was sent by Federal Express standard overnight mail, to the party listed below.


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Lucy Holmes Plovnick

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EXHIBIT B

GROWTH IN THE COPYRIGHT ROYALTY FUNDS
As of June 30, 2015

Cable	Distributed	Funds Available for Distribution	Fund Total	Percent Growth
2015		\$ 23,146.25	\$ 23,146.25	
2014		\$ 233,425,637.47	\$ 233,425,637.47	3.385%
2013	\$ 135,376,610.47	\$ 90,406,304.23	\$ 225,782,914.70	3.213%
2012	\$ 131,154,417.29	\$ 87,599,234.76	\$ 218,753,652.05	4.724%
2011	\$ 104,372,898.09	\$ 104,513,024.12	\$ 208,885,922.21	4.939%
2010	\$ 99,471,281.18	\$ 99,583,415.66	\$ 199,054,696.84	15.464%
2009	\$ 170,007,071.26	\$ 2,387,838.85	\$ 172,394,910.11	9.322%
2008	\$ 154,453,333.36	\$ 3,240,907.79	\$ 157,694,241.15	7.639%
2007	\$ 143,324,976.34	\$ 3,177,821.52	\$ 146,502,797.86	-1.148%
2006	\$ 144,995,269.72	\$ 3,208,916.84	\$ 148,204,186.56	0.440%
2005	\$ 144,379,726.84	\$ 3,174,974.61	\$ 147,554,701.45	-0.868%
2004	\$ 145,706,556.76	\$ 3,140,288.02	\$ 148,846,844.78	4.980%
2003	\$ 135,873,383.10	\$ 5,912,206.89	\$ 141,785,589.99	4.285%
2002	\$ 129,999,746.71	\$ 5,960,567.42	\$ 135,960,314.13	4.469%
2001	\$ 125,989,180.08	\$ 4,154,512.18	\$ 130,143,692.26	0.336%
2000	\$ 124,231,797.99	\$ 5,476,469.25	\$ 129,708,267.24	1.583%
1999	\$ 126,859,142.09	\$ 827,907.19	\$ 127,687,049.28	7.609%
1998	\$ 118,658,863.52	\$ -	\$ 118,658,863.52	-29.003%
1997	\$ 167,131,874.33	\$ -	\$ 167,131,874.33	-13.505%
1996	\$ 193,226,378.73	\$ -	\$ 193,226,378.73	4.957%
1995	\$ 184,100,108.79	\$ -	\$ 184,100,108.79	0.856%
1994	\$ 182,537,983.61	\$ -	\$ 182,537,983.61	-7.976%
1993	\$ 198,358,895.89	\$ -	\$ 198,358,895.89	-4.141%
1992	\$ 206,927,361.79	\$ -	\$ 206,927,361.79	4.896%
1991	\$ 197,268,160.18	\$ -	\$ 197,268,160.18	3.277%
1990	\$ 191,008,817.18	\$ -	\$ 191,008,817.18	-18.148%
1989	\$ 233,357,881.12	\$ -	\$ 233,357,881.12	10.753%
1988	\$ 210,700,327.26	\$ -	\$ 210,700,327.26	20.731%
1987	\$ 174,520,466.90	\$ -	\$ 174,520,466.90	34.168%
1986	\$ 130,075,787.76	\$ -	\$ 130,075,787.76	13.697%
1985	\$ 114,405,851.01	\$ -	\$ 114,405,851.01	9.630%
1984	\$ 104,356,049.26	\$ -	\$ 104,356,049.26	23.681%
1983	\$ 84,375,487.60	\$ -	\$ 84,375,487.60	90.100%
1982	\$ 44,384,827.90	\$ -	\$ 44,384,827.90	24.785%
1981	\$ 35,569,141.41	\$ -	\$ 35,569,141.41	26.782%
1980	\$ 28,055,312.82	\$ -	\$ 28,055,312.82	18.059%
1979	\$ 23,763,757.07	\$ -	\$ 23,763,757.07	34.339%
1978	\$ 17,689,455.56	\$ -	\$ 17,689,455.56	
Total	\$ 4,856,668,180.97	\$ 656,213,173.05	\$ 5,512,881,354.02	

DART	Distributed	Funds Available for Distribution	Fund Total	Percent Growth
2015		\$ 73,400.19	\$ 73,400.19	
2014	\$ 4,797.39	\$ 175,110.39	\$ 179,907.78	-68.758%
2013	\$ 406,485.09	\$ 169,371.16	\$ 575,856.25	-68.001%
2012	\$ 1,196,754.01	\$ 602,839.96	\$ 1,799,593.97	-11.166%
2011	\$ 1,953,112.15	\$ 72,679.62	\$ 2,025,791.77	10.093%
2010	\$ 1,637,924.92	\$ 202,152.89	\$ 1,840,077.81	27.255%
2009	\$ 1,410,788.04	\$ 35,186.88	\$ 1,445,974.92	-33.110%
2008	\$ 2,154,384.82	\$ 7,327.58	\$ 2,161,712.40	13.903%
2007	\$ 1,894,081.77	\$ 3,779.55	\$ 1,897,861.32	-41.203%
2006	\$ 3,227,807.86	\$ -	\$ 3,227,807.86	26.634%
2005	\$ 2,548,927.56	\$ -	\$ 2,548,927.56	-2.230%
2004	\$ 2,607,058.05	\$ -	\$ 2,607,058.05	-15.883%
2003	\$ 3,099,332.52	\$ -	\$ 3,099,332.52	-10.116%
2002	\$ 3,448,148.32	\$ -	\$ 3,448,148.32	-11.233%
2001	\$ 3,884,471.69	\$ -	\$ 3,884,471.69	-23.941%
2000	\$ 5,107,180.05	\$ -	\$ 5,107,180.05	38.933%
1999	\$ 3,675,998.75	\$ -	\$ 3,675,998.75	75.997%
1998	\$ 2,088,669.58	\$ -	\$ 2,088,669.58	157.116%
1997	\$ 812,345.26	\$ -	\$ 812,345.26	63.567%
1996	\$ 496,643.45	\$ -	\$ 496,643.45	23.617%
1995	\$ 401,760.68	\$ -	\$ 401,760.68	-17.252%
1994	\$ 485,520.73	\$ -	\$ 485,520.73	10.372%
1993	\$ 439,896.42	\$ -	\$ 439,896.42	272.549%
1992	\$ 118,077.39	\$ -	\$ 118,077.39	
Total	\$ 43,100,166.50	\$ 1,341,848.22	\$ 44,442,014.72	

GROWTH IN THE COPYRIGHT ROYALTY FUNDS

As of June 30, 2015

Satellite	Distributed	Funds Available for Distribution	Fund Total	Percent Growth
2015		\$ -	\$ -	
2014		\$ 80,781,765.21	\$ 80,781,765.21	-8.173%
2013	\$ 51,448,085.10	\$ 34,298,990.21	\$ 85,747,075.31	-2.529%
2012	\$ 52,431,964.88	\$ 35,539,772.76	\$ 87,971,737.64	-7.059%
2011	\$ 47,191,054.08	\$ 47,462,554.16	\$ 94,653,608.24	-0.956%
2010	\$ 47,569,905.73	\$ 47,997,464.20	\$ 95,567,369.93	3.464%
2009	\$ 90,408,343.07	\$ 1,959,048.59	\$ 92,367,391.66	-2.195%
2008	\$ 92,474,011.03	\$ 1,966,635.16	\$ 94,440,646.19	1.618%
2007	\$ 90,929,269.91	\$ 2,007,554.36	\$ 92,936,824.27	0.542%
2006	\$ 90,430,345.69	\$ 2,005,306.77	\$ 92,435,652.46	5.933%
2005	\$ 85,276,466.54	\$ 1,982,089.06	\$ 87,258,555.60	8.438%
2004	\$ 78,517,338.21	\$ 1,951,639.88	\$ 80,468,978.09	8.797%
2003	\$ 71,282,625.08	\$ 2,680,044.57	\$ 73,962,669.65	-2.143%
2002	\$ 72,843,718.51	\$ 2,738,541.26	\$ 75,582,259.77	-10.056%
2001	\$ 81,155,220.12	\$ 2,877,480.01	\$ 84,032,700.13	4.738%
2000	\$ 77,177,988.28	\$ 3,053,458.65	\$ 80,231,446.93	-17.975%
1999	\$ 97,275,934.39	\$ 536,921.24	\$ 97,812,855.63	-20.502%
1998	\$ 123,038,811.72		\$ 123,038,811.72	147.266%
1997	\$ 49,759,622.45		\$ 49,759,622.45	39.929%
1996	\$ 35,560,579.56		\$ 35,560,579.56	33.887%
1995	\$ 26,560,160.09		\$ 26,560,160.09	22.372%
1994	\$ 21,704,529.50		\$ 21,704,529.50	45.515%
1993	\$ 14,915,705.85		\$ 14,915,705.85	79.212%
1992	\$ 8,322,921.38		\$ 8,322,921.38	121.151%
1991	\$ 3,763,460.28		\$ 3,763,460.28	8.806%
1990	\$ 3,458,868.93		\$ 3,458,868.93	28.035%
1989	\$ 2,701,496.64		\$ 2,701,496.64	
Total	\$ 1,416,198,427.02	\$ 269,839,266.09	\$ 1,686,037,693.11	

Jukebox	Distributed	Funds Available for Distributed	Fund Total	Percent Growth
1989	\$ 6,752,337.38		\$ 6,752,337.38	0.305%
1988	\$ 6,731,811.22		\$ 6,731,811.22	2.908%
1987	\$ 6,541,565.53		\$ 6,541,565.53	22.247%
1986	\$ 5,351,103.43		\$ 5,351,103.43	-2.989%
1985	\$ 5,515,961.19		\$ 5,515,961.19	-7.956%
1984	\$ 5,992,715.25		\$ 5,992,715.25	89.192%
1983	\$ 3,167,527.51		\$ 3,167,527.51	-4.618%
1982	\$ 3,320,896.88		\$ 3,320,896.88	180.660%
1981	\$ 1,183,245.97		\$ 1,183,245.97	-3.612%
1980	\$ 1,227,583.32		\$ 1,227,583.32	-9.729%
1979	\$ 1,359,885.45		\$ 1,359,885.45	21.220%
1978	\$ 1,121,834.39		\$ 1,121,834.39	
Total	\$ 48,266,467.52		\$ 48,266,467.52	

Grand Total \$ 6,364,233,242.01 \$ 927,394,287.36 \$ 7,291,627,529.37

EXHIBIT C

MPA Reconciliation of Funds on Reserve for the Devotional Category Applying Devotional Category Reserve Percentages in the Joint Response

Funds Available For Distribution on 4/14/16 Prior to PS category distribution (Source: LD Appendix)

2000 \$	5,474,412.94
2001 \$	4,152,952.23
2002 \$	5,958,329.30
2003 \$	5,909,976.88

Percentage of Funds on Reserve Attributable to the Devotional Category (Source: Joint Response)

2000	14.47358%
2001	18.98232%
2002	13.78931%
2003	14.07237%

Dollar Amount of Funds that Should Have Been Held On Reserve For the Devotional Category on 4/14/16 (applying reserve percentages for Devotional Category in Joint Response)

2000 \$	792,343.54
2001 \$	788,326.68
2002 \$	821,612.50
2003 \$	831,673.81

Dollar Amount of Funds Actually Held On Reserve For The Devotional Category On 4/14/16 (i.e., Fund Balance Following PS Distribution)

2000 \$	1,875,904.42
2001 \$	779,765.04
2002 \$	808,558.55
2003 \$	615,326.10

Difference

2000 \$	1,083,560.88
2001 \$	(8,561.64)
2002 \$	(13,053.95)
2003 \$	(216,347.71)

Proof of Delivery

I hereby certify that on Friday, October 09, 2020, I provided a true and correct copy of the (Redacted Public Version) MPA Supplemental Response To Order Directing Recalculation Of Royalty Allocations In The Devotional Category And Seeking Additional Guidance to the following:

Settling Devotional Claimants (SDC), represented by Jessica T Nyman, served via ESERVICE at jessica.nyman@pillsburylaw.com

Independent Producers Group (IPG), represented by Brian D Boydston, served via ESERVICE at brianb@ix.netcom.com

Signed: /s/ Lucy H Plovnick