

**Before The  
THE COPYRIGHT ROYALTY JUDGES  
WASHINGTON, DC**

---

<b>In re:</b>	)	
	)	<b>CONSOLIDATED DOCKET NUMBER</b>
	)	<b>16-CRB-0009 CD (2014-17)</b>
<b>Distribution of Cable</b>	)	
<b>Royalty Funds</b>	)	
	)	
	)	

---

**THE CANADIAN CLAIMANTS GROUP  
NOTICE OF CONTROVERSY**

The Canadian Claimants Group (“CCG”), hereby submits this Notice in response to the Scheduling Order and Notice of Voluntary Negotiation Period (the “Notice”) issued by the Copyright Royalty Judges (“the Judges”) dated April 5, 2021, in the above-captioned proceeding.

**Existence of Controversies**

**Allocation Phase**

Despite good faith effort involving one on one communications and a joint settlement call on June 24, 2021, a controversy exists as to the allocation of the 2014-2017 Cable Funds among the CCG and the other Allocation Phase claimant groups, as defined in Exhibit A to the Notice.. The- Judges will need to schedule hearings to resolve the allocation of the shares. The CCG has included a proposed schedule for the Allocation Phase at Exhibit A.

## **Distribution Phase**

The CCG is aware that Multigroup Claimants (“MGC”) has asserted claims for a share of the royalties allocated to the CCG category for the years 2015-2017. The Judges will need to determine the relative value of the programming represented by MGC versus the programming of the CCG members in the CCG category. The CCG would propose that the Distribution Phase be scheduled to commence after the conclusion of the Allocation Phase.

Dated: July 19, 2021

Respectfully Submitted,

/s/ L. Kendall Satterfield \_\_\_\_\_

L. Kendall Satterfield  
DC Bar No. 393953  
Satterfield PLLC  
1629 Street NW, Ste 300  
Washington, DC 20006  
Telephone (202) 355-6432  
[lksatterfield@satterfield-pllc.com](mailto:lksatterfield@satterfield-pllc.com)

Victor J. Cosentino  
Larson & Gaston, LLP  
CA Bar No. 163672  
200 S. Los Robles Ave, Suite 530  
Pasadena, CA 91101  
Telephone: (626) 795-6001  
Fax: (626) 795-0016  
[Victor.cosentino@larsongaston.com](mailto:Victor.cosentino@larsongaston.com)

***Counsel for Canadian Claimants Group***

**Exhibit A**

**Exhibit A 2014-2017 Cable Allocation Proceeding – Proposed Schedule**

<b>Date</b>	<b>CFR Requirement</b>	<b>Event</b>
December 13, 2021	37 C.F.R. § 351.4(a) <u>4-5 months</u> following end of Voluntary Negotiation Period	Deadline for Written Direct Statements (WDS)
January 27, 2022	37 C.F.R. §351.6 <u>45 days</u> following WDS submission	End Discovery for WDS
February 11, 2022	§351.4(c) Within <u>15 days</u> following end of WDS discovery	Deadline for Amended WDS
February 16, 2022	§351.7 Within <u>21 days</u> following end of WDS discovery	Joint Settlement Conference Period
March 4, 2022		End of Discovery for Amended WDS
May 28, 2022		Deadline for Written Rebuttal Statements (WRS)
June 28, 2022		End of Discovery for WRS
Fall 2022		Hearing

# Proof of Delivery

I hereby certify that on Monday, July 19, 2021, I provided a true and correct copy of the THE CANADIAN CLAIMANTS GROUP NOTICE OF CONTROVERSY to the following:

SESAC Performing Rights, LLC, represented by John C. Beiter, served via ESERVICE at john@beiterlaw.com

Global Music Rights, LLC, represented by Scott A Zebrak, served via ESERVICE at scott@oandzlaw.com

Joint Sports Claimants, represented by Michael E Kientzle, served via ESERVICE at michael.kientzle@arnoldporter.com

Program Suppliers, represented by Lucy H Plovnick, served via ESERVICE at lhp@msk.com

ASCAP, represented by Sam Mosenkis, served via ESERVICE at smosenkis@ascap.com

Major League Soccer, L.L.C., represented by Edward S. Hammerman, served via ESERVICE at ted@copyrighroyalties.com

Broadcast Music, Inc. (BMI), represented by Jennifer T. Criss, served via ESERVICE at jennifer.criss@dbr.com

Public Television Claimants, represented by Ronald G. Dove Jr., served via ESERVICE at rdove@cov.com

Devotional Claimants, represented by Matthew J MacLean, served via ESERVICE at matthew.maclean@pillsburylaw.com

Commercial Television Claimants / National Association of Broadcasters, represented by John Stewart, served via ESERVICE at jstewart@crowell.com

Multigroup Claimants, represented by Brian D Boydston, served via ESERVICE at brianb@ix.netcom.com

National Public Radio, represented by Gregory A Lewis, served via ESERVICE at

glewis@npr.org

Signed: /s/ Lawrence K Satterfield