

Before the
COPYRIGHT ROYALTY JUDGES
Washington, DC

In the Matter of)
)
) **Docket No. 16-CRB-0009-CD (2014-17)**
Distribution of the)
2014-17 Cable Funds)
)

**NATIONAL PUBLIC RADIO, INC.’S
MOTION TO ACCEPT LATE NOTICE OF CONTROVERSY**

National Public Radio, Inc. (“NPR”) respectfully moves the Copyright Royalty Judges to accept the late filing of NPR’s Notice of Controversy in the above-captioned proceeding, which is being filed concurrently with this motion.

Pursuant to the Scheduling Order and Notice of Voluntary Negotiation Period entered on April 5, 2021, NPR’s Notice of Controversy was due on July 19, 2021. Between the time of the entry of the Scheduling Order in April and the filing deadline, NPR’s longtime prior counsel in this and previous CRB proceedings, Gregory A. Lewis, retired. The undersigned noticed her appearance as NPR’s counsel of record in this proceeding as of today. Due to a misunderstanding in the transition of responsibilities, the undersigned was not aware of the July 19, 2021, filing deadline.

None of the parties participating in this proceeding will be prejudiced by the grant of this motion. Throughout the Voluntary Negotiation Period began, NPR has engaged in good faith settlement discussions with every relevant party to the proceeding. Each such party has knowledge of NPR’s proposal. Almost all the parties have already informally accepted NPR’s proposed settlement terms, and no party has rejected NPR’s proposal. Despite the delay in filing its Notice

of Controversy, NPR expects that it will soon resolve all its claims by voluntary agreement, as it has done in the several most recent previous cable royalty distribution proceedings.

NPR will take steps to ensure that all other filings in this proceeding will be timely. Because NPR's failure to meet the deadline was inadvertent and no parties have been unduly prejudiced, NPR respectfully requests that the Judges grant this motion and accept the late filing of its Notice of Controversy.

Respectfully submitted,

/s/ Amanda Huetinck
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Dated: July 26, 2021

Proof of Delivery

I hereby certify that on Monday, July 26, 2021, I provided a true and correct copy of the NPR Motion to Accept Late Notice of Controversy to the following:

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

Canadian Claimants, represented by Lawrence K Satterfield, served via ESERVICE at lksatterfield@satterfield-pllc.com

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

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

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

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

Commercial Television Claimants / National Association of Broadcasters, represented by David J Ervin, served via ESERVICE at dervin@crowell.com

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

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

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

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

Major League Soccer, L.L.C., represented by Edward S. Hammerman, served via

ESERVICE at ted@copyrightroyalties.com

Signed: /s/ Amanda Huetinck