

Before the  
**COPYRIGHT ROYALTY JUDGES**  
The Library of Congress

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

**SETTLING DEVOTIONAL CLAIMANTS' PARTIAL OPPOSITION TO  
INDEPENDENT PRODUCERS GROUP'S SECOND RENEWED MOTION FOR  
PARTIAL DISTRIBUTION OF 2000-2003 CABLE ROYALTIES**

The Settling Devotional Claimants (“SDC”) hereby respond to Independent Producers Group’s (“IPG”) Motion for Final Distribution of 2000-2003 Cable Royalties or, Alternatively, Second Renewed Motion for Partial Distribution of 2000-2003 Cable Royalties.

While the SDC would welcome a final distribution of 2000-03 cable royalties, the SDC must oppose any partial distribution to IPG in any amount that would leave a significant possibility for a need to recoup funds from IPG. For the reasons previously stated in the SDC’s Comments to IPG’s Motion for Partial Distribution, Dkt. 2008-2 CRB CD 2000-2003 (Phase II) (May 1, 2019), the SDC have a reasonable objection to any non-final distribution to IPG, based on IPG’s demonstrated unwillingness or inability to disgorge funds, and based on concerns about IPG’s continued solvency. Any distribution should be made following a final and certain determination of the amounts available for final distribution. If insufficient funds are available for a full and final distribution of 2000-03 cable royalty funds, then IPG should receive a distribution no greater than its *pro rata* share of available amounts pending recoupment from any other parties.

August 6, 2021

Respectfully submitted,

**SETTLING DEVOTIONAL CLAIMANTS**

/s/ Matthew J. MacLean

Matthew J. MacLean, D.C. Bar No. 479257

[Matthew.maclean@pillsburylaw.com](mailto:Matthew.maclean@pillsburylaw.com)

Michael A. Warley, D.C. Bar No. 1028686

[Michael.warley@pillsburylaw.com](mailto:Michael.warley@pillsburylaw.com)

Jessica T. Nyman, D.C. Bar No. 1030613

[Jessica.nyman@pillsburylaw.com](mailto:Jessica.nyman@pillsburylaw.com)

PILLSBURY WINTHROP SHAW

PITTMAN LLP

1200 Seventeenth Street, NW

Washington, DC 20036

Telephone: (202) 663-8000

Fax: (202) 663-8007

**Certificate of Service**

I certify that on August 6, 2021, 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/ Michael Warley

Michael Warley

# Proof of Delivery

I hereby certify that on Friday, August 06, 2021, I provided a true and correct copy of the SDC Opposition to IPG 2nd Renewed Motion for Partial Distribution to the following:

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

Signed: /s/ Michael A Warley