

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

*In re*

<b>DISTRIBUTION OF CABLE ROYALTY FUNDS</b>	<b>DOCKET NO. 16-CRB-0009 CD (2014-17)</b>
<b>DISTRIBUTION OF SATELLITE ROYALTY FUNDS</b>	<b>DOCKET NO. 16-CRB-0010 SD (2014-17)</b>

**REDACTION LOG ACCOMPANYING MPA MOTION FOR DISALLOWANCE OF CLAIMS MADE BY MULTIGROUP CLAIMANTS**

As required by the February 17, 2022 Protective Order (“Protective Order”) issued in this proceeding by the Copyright Royalty Judges (“Judges”), the Motion Picture Association, Inc. (“MPA”), on behalf of its member companies and other producers and distributors of syndicated series, movies, specials, and non-team sports broadcast by television stations (“MPA-represented Program Suppliers”), hereby submits a Redaction Log in connection with the Redacted Public Version of attachments to the MPA Motion For Disallowance Of Claims Made By Multigroup Claimants (“Motion”), filed in the captioned proceedings.

MPA made the following redactions to the RESTRICTED version of the Declaration Of Lucy Holmes Plovnick (“Plovnick Declaration”) and the Declaration Of Jeffrey S. Gray, Ph.D. (“Gray Declaration”) both of which are attachments to the Motion:

1. **Exhibit A** to the Plovnick Declaration is a true and correct copy of the Transfer Of Ownership Interests In Multigroup Claimants And Spanish Language Producers agreement, dated January 1, 2018 and signed by Al Galaz and Ryan Galaz, which MPA received in discovery in these proceedings from Multigroup Claimants (“MC”). MC designated this

document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

2. **Exhibit B** to the Plovnick Declaration is a true and correct copy of the Transfer Of Interests To Worldwide Subsidy Group, LLC agreement, dated October 14, 2020 and signed twice by Ryan Galaz, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

3. **Exhibit C** to the Plovnick Declaration is a true and correct copy of the Microsoft Excel spreadsheet titled MC Represented Programs (w translations)(REVISED 03.11.22).xlsx, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

4. **Exhibit F** to the Plovnick Declaration is a true and correct copy of a September 21, 2012 affidavit executed by Margaret A. Dale on behalf of Fédération Internationale de Football Association (“FIFA”), and filed in Docket No. 2008-2 CRB CD 2000-03, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

5. **Exhibit L** to the Plovnick Declaration are true and correct copies of Representation Agreements between MPA and Carol Reynolds, Inc. (“Carol Reynolds”), dated October 29, 2013 and March 16, 2020, which MPA produced to MC in discovery in these proceedings. MPA designated these documents as RESTRICTED when they were produced in discovery, so MPA redacted the documents in their entirety from the Public Version of the Plovnick Declaration.

6. **Exhibit M** to the Plovnick Declaration are true and correct copies of a Mandate Agreement between IPG and Carol Reynolds Productions for the 2000 royalty year, and a Letter of Extension, dated May 7, 2002, which MPA received in discovery in these proceedings from MC. MC designated these documents as RESTRICTED when they were produced in discovery, so MPA redacted the documents in their entirety from the Public Version of the Plovnick Declaration.

7. **Exhibit N** to the Plovnick Declaration are true and correct copies of cable and satellite Representation Agreements between MPA and Compact Collections Ltd. (“Compact”), dated November 14, 2008, March 18, 2010, and March 12, 2020, and correspondence from Compact to MPA attaching a copy of its agreement with Cinemavault Releasing, Inc., which MPA produced to MC in discovery in these proceedings. MPA designated these documents as RESTRICTED when they were produced in discovery, so MPA redacted the documents in their entirety from the Public Version of the Plovnick Declaration.

8. **Exhibit O** to the Plovnick Declaration contains a true and correct copy of a Mandate Agreement between IPG and S. Entertainment, Inc., *et al.* (“S. Entertainment”) for the 2000 royalty year, and a Letter of Extension, for S. Entertainment dated July 24, 2002 that includes Cinemavault Releasing, Inc. in a list of other entities, which MPA received in discovery in these proceedings from MC. MC designated these documents as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

9. **Exhibit P** to the Plovnick Declaration is a true and correct copy of a Representation Agreement between MPA and Production Pixcom, Inc. (“Pixcom”), dated April 20, 2016, which MPA produced to MC in discovery in these proceedings. MPA designated this

document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

10. **Exhibit Q** to the Plovnick Declaration is a true and correct copy of an Acknowledgement of Representation for Pixcom dated May 3, 2014, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

11. **Exhibit R** to the Plovnick Declaration is a true and correct copy of Representation Agreements between MPA and Audio-Visual Copyright Society (“AVCS”), dated April 10, 2013, and March 20, 2020, documents MPA received from AVCS, including an agreement that Questar signed with AVCS dated December 13, 2012, and documents showing that Questar registered its works with AVCS on December 14, 2012 and January 9, 2013, all of which MPA produced to MC in discovery in these proceedings. MPA designated these documents as RESTRICTED when it was produced in discovery, so MPA redacted the documents in their entirety from the Public Version of the Plovnick Declaration.

12. **Exhibit S** to the Plovnick Declaration is a true and correct copy of a Representation Agreement between MPA and Cinemaginaire, Inc. (“Cinemaginaire”), dated April 20, 2016, which MPA produced to MC in discovery in these proceedings. MPA designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

13. **Exhibit T** to the Plovnick Declaration is a true and correct copy of a Representation Agreement between IPG and Cinemaginaire, dated as of November 11, 2001, and an Acknowledgement of Representation for Cinemaginaire, dated April 28, 2014, which MPA received in discovery in these proceedings from MC. MC designated these documents as

RESTRICTED when they were produced in discovery, so MPA redacted the documents in their entirety from the Public Version of the Plovnick Declaration.

14. **Exhibit U** to the Plovnick Declaration is a true and correct copy of a Representation Agreement between MPA and Magus Entertainment (“Magus”) through Conexion Media Group PLC., dated April 4, 2013, which MPA produced to MC in discovery in these proceedings. MPA designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

15. **Exhibit V** to the Plovnick Declaration is a true and correct copy of a Representation Agreement between WSG and Magus, dated as of June 27, 2000, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

16. **Exhibit W** to the Plovnick Declaration is a true and correct copy of a Representation Agreement between WSG and Adams Golf, dated as of July 27, 2000, and an Acknowledgement of Representation for Adams Golf, dated April 11, 2014, which MPA received in discovery in these proceedings from MC. MC designated these documents as RESTRICTED when they were produced in discovery, so MPA redacted the documents in their entirety from the Public Version of the Plovnick Declaration.

17. **Exhibit X** to the Plovnick Declaration is a true and correct copy of an Acknowledgement of Representation for Cappy Productions, Inc., dated March 12, 2014, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

18. **Exhibit Y** to the Plovnick Declaration is a true and correct copy of a Representation Agreement between WSG and Five Star Productions, dated as of July 28, 2000, and an Acknowledgement of Representation for Five Star Productions, dated March 1, 2014, which MPA received in discovery in these proceedings from MC. MC designated these documents as RESTRICTED when they were produced in discovery, so MPA redacted the documents in their entirety from the Public Version of the Plovnick Declaration.

19. **Exhibit Z** to the Plovnick Declaration is a true and correct copy of an Acknowledgement of Representation for Florentine Films/Hott Productions, Inc., dated March 2, 2014, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

20. **Exhibit AA** to the Plovnick Declaration are a true and correct copies of a Mandate Agreement with Beckmann International (“Beckmann”) for the 2000 royalty year, a Letter of Extension that Beckman executed on behalf of multiple entities, including “Inca,” dated May 9, 2002, and an Acknowledgement of Representation for InCa Productions, dated March 3, 2014, which MPA received in discovery in these proceedings from MC. MC designated these documents as RESTRICTED when they were produced in discovery, so MPA redacted the documents in their entirety from the Public Version of the Plovnick Declaration.

21. **Exhibit BB** to the Plovnick Declaration is a true and correct copy of an Acknowledgement of Representation for JCS Entertainment II, Inc., dated March 5, 2014, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

22. **Exhibit CC** to the Plovnick Declaration contains true and correct copies of a Representation Agreement between IPG and Knight Enterprises, dated as of November 15, 2001, and an Acknowledgement of Representation for Knight Enterprises, dated May 30, 2016, which MPA received in discovery in these proceedings from MC. MC designated these documents as RESTRICTED when they were produced in discovery, so MPA redacted the documents in their entirety from the Public Version of the Plovnick Declaration.

23. **Exhibit DD** to the Plovnick Declaration is a true and correct copy of a Representation Agreement between IPG and Lawrence Welk Syndication, dated as of October 12, 2001, and an Acknowledgement of Representation for Lawrence Welk Syndication, dated March 5, 2014, which MPA received in discovery in these proceedings from MC. MC designated these documents as RESTRICTED when they were produced in discovery, so MPA redacted the documents in their entirety from the Public Version of the Plovnick Declaration.

24. **Exhibit EE** to the Plovnick Declaration is a true and correct copy of an Acknowledgement of Representation for Mojo Brands Media, dated April 25, 2014, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

25. **Exhibit FF** to the Plovnick Declaration is a true and correct copy of an Acknowledgement of Representation for MoneyTV Net., Inc., dated April 21, 2014, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

26. **Exhibit GG** to the Plovnick Declaration is a true and correct copy of an Acknowledgement of Representation for Firing Line (aka National Review, Inc.), dated March 4,

2014, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

27. **Exhibit HH** to the Plovnick Declaration is a true and correct copy of an Acknowledgement of Representation for Network Programs International, dated March 6, 2014, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

28. **Exhibit II** to the Plovnick Declaration is a true and correct copy of an Acknowledgement of Representation for Sarrazin Couture Entertainment, dated March 26, 2014, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

29. **Exhibit JJ** to the Plovnick Declaration is a true and correct copy of an Acknowledgement of Representation for Satsuki Ina (aka Hesono O Productions), dated March 2, 2014, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

30. **Exhibit KK** to the Plovnick Declaration is a true and correct copy of a Representation Agreement between IPG and Sound Venture Productions Ottawa, Ltd., dated as of November 14, 2001, and an Acknowledgement of Representation for Sound Venture Productions Ottawa, Ltd., dated March 5, 2014, which MPA received in discovery in these proceedings from MC. MC designated these documents as RESTRICTED when they were



produced in discovery, so MPA redacted the documents in their entirety from the Public Version of the Plovnick Declaration.

31. **Exhibit LL** to the Plovnick Declaration is a true and correct copy of a Representation Agreement between IPG and Thump Records, Inc., dated as of July 29, 2002, and an Acknowledgement of Representation for Thump Records, Inc., dated March 3, 2014, which MPA received in discovery in these proceedings from MC. MC designated these documents as RESTRICTED when they were produced in discovery, so MPA redacted the documents in their entirety from the Public Version of the Plovnick Declaration.

32. **Exhibit MM** to the Plovnick Declaration is a true and correct copy of an Acknowledgement of Representation for Tremendous Entertainment., dated May 31, 2016, which MPA received in discovery in these proceedings from MC. MC designated this document as RESTRICTED when it was produced in discovery, so MPA redacted this document in its entirety from the Public Version of the Plovnick Declaration.

33. **Exhibit C** to the Gray Declaration contains copies of Microsoft Excel worksheets showing Dr. Gray's analysis of MC Represented Programs (w translations)(REVISED 03.11.22).xlsx, which MC produced in discovery to MPA in this proceeding and designated as RESTRICTED. Because this document was prepared using information in MC Represented Programs (w translations)(REVISED 03.11.22).xlsx, MPA redacted this document in its entirety from the Public Version of the Gray Declaration.

34. All of the documents and information described in paragraphs 1-33 above were designated as RESTRICTED information when they were produced in discovery in these proceedings by MC and MPA, respectively. Accordingly, the parties have represented that these documents and satisfy the definition of protected materials set forth in the Protective Order. *See* Protective Order at 2.

Respectfully submitted,

*/s/ Lucy Holmes Plovnick*

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Dated: May 4, 2022

**CERTIFICATE OF SERVICE**

I certify that on May 4, 2022, 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

# Proof of Delivery

I hereby certify that on Wednesday, May 04, 2022, I provided a true and correct copy of the Redaction Log Accompanying MPA Motion For Disallowance Of Claims Made By Multigroup Claimants to the following:

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

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

Broadcaster Claimants Group, represented by John Stewart, served via E-Service at jstewart@crowell.com

Broadcast Music, Inc., represented by Jennifer T. Criss, served via E-Service at jennifer.criss@dbr.com

American Society of Composers, Authors and Publishers (ASCAP), represented by Sam Mosenkis, served via E-Service at smosenkis@ascap.com

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

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

Major League Soccer, L.L.C., represented by Edward S. Hammerman, served via E-Service at ted@copyrightroyalties.com

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

Signed: /s/ Lucy H Plovnick