

Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, D.C.

*In re*

**DISTRIBUTION OF CABLE ROYALTY  
FUNDS**

**CONSOLIDATED PROCEEDING NO.  
16-CRB-0009 CD (2014-17)**

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**JOINT NOTICE AND MOTION REGARDING SETTling DEVOTIONAL  
CLAIMANTS' NOTICE OF INTENT TO PROCEED WITH MOTION TO COMPEL  
DISCOVERY AND MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEF**

The Public Television Claimants (“Public Television”) and Settling Devotional Claimants (“SDC”) met and conferred regarding SDC’s September 15, 2022 Notice of Intent to Proceed with Motion to Compel Discovery Against Public Television (“SDC’s Motion to Compel”) and Motion for Leave to File Supplemental Brief in Support (“SDC’s Supplemental Briefing Motion”).


To minimize disputes before the Judges, Public Television has consented to SDC’s Supplemental Briefing Motion and will file a consolidated opposition to SDC’s Motion to Compel and Supplemental Brief. In exchange, SDC has consented to enlarging the page limit for Public Television’s opposition from 20 pages to 25 pages in order to match the total page count of SDC’s Motion to Compel (18 pages) and Supplemental Brief (7 pages).

With the Judges’ grant of this Motion, SDC’s Supplemental Brief shall be received as filed and Public Television’s 25-page consolidated opposition brief will be due on September 30, 2022.

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Respectfully submitted,

**PUBLIC TELEVISION CLAIMANTS**



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**SETTLING DEVOTIONAL CLAIMANTS**

/s/ Matthew J. MacLean

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# Proof of Delivery

I hereby certify that on Wednesday, September 21, 2022, I provided a true and correct copy of the JOINT NOTICE AND MOTION REGARDING SETTling DEVOTIONAL CLAIMANTS' NOTICE OF INTENT TO PROCEED WITH MOTION TO COMPEL DISCOVERY AND MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEF to the following:

Commercial Television Claimants / National Association of Broadcasters, represented by David J Ervin, served via E-Service at [dervin@crowell.com](mailto:dervin@crowell.com)

Global Music Rights, LLC, represented by Scott A Zebrak, served via E-Service at [scott@oandzlaw.com](mailto:scott@oandzlaw.com)

Program Suppliers, represented by Lucy H Plovnick, served via E-Service at [lh@msk.com](mailto:lh@msk.com)

ASCAP, represented by Sam Mosenkis, served via E-Service at [smosenkis@ascap.com](mailto:smosenkis@ascap.com)

Major League Soccer, L.L.C., represented by Edward S. Hammerman, served via E-Service at [ted@copyrightroyalties.com](mailto:ted@copyrightroyalties.com)

National Public Radio, represented by Amanda Huetinck, served via E-Service at [ahuetinck@npr.org](mailto:ahuetinck@npr.org)

Broadcast Music, Inc. (BMI), represented by Jennifer T. Criss, served via E-Service at [jennifer.criss@dbr.com](mailto:jennifer.criss@dbr.com)

Canadian Claimants, represented by Lawrence K Satterfield, served via E-Service at [lksatterfield@satterfield-pllc.com](mailto:lksatterfield@satterfield-pllc.com)

SESAC Performing Rights, LLC, represented by Timothy L Warnock, served via E-Service at [twarnock@loeb.com](mailto:twarnock@loeb.com)

Joint Sports Claimants, represented by Michael E Kientzle, served via E-Service at [michael.kientzle@arnoldporter.com](mailto:michael.kientzle@arnoldporter.com)

Multigroup Claimants, represented by Brian D Boydston, served via E-Service at [brianb@ix.netcom.com](mailto:brianb@ix.netcom.com)

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

Signed: /s/ Dustin Cho