

Before the  
Copyright Royalty Judges  
Washington, D.C.

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

**INDEPENDENT PRODUCERS GROUP’S RESPONSE TO  
RESTRICTED ORDER FURTHER TO SECOND ORDER  
DIRECTING RECALCULATION OF ROYALTY ALLOCATIONS**

As directed by the Copyright Royalty Judges (“Judges”) in their October 13, 2022 *Restricted Order Further to Second Order Directing Recalculation of Royalty Allocations* (“October 13 Order”), and the October 14, 2022 *Restricted Order and Addendum to Order Further to Second Order Directing Recalculation of Royalty Allocations* (“Addendum”), Independent Producers Group dba Worldwide Subsidy Group, LLC (“IPG”) hereby notifies the Judges that it has reviewed the Licensing Section’s recalculations as set forth in the Addendum.

**INDEPENDENT PRODUCERS GROUP’S RESPONSE TO  
RESTRICTED ORDER FURTHER TO SECOND ORDER  
DIRECTING RECALCULATION OF ROYALTY ALLOCATIONS**

IPG notes that the Licensing Section's recalculations in the Addendum are dated as of April 30, 2022, which was approximately six months ago, a fact also noted by the MPA-represented Program Suppliers in their response to the October 13, 2022 Order and Addendum. IPG hereby notifies the Judges that it has no objection to the Licensing Section's recalculations as set forth in the Addendum, subject to the Licensing Section updating their calculations to account for the growth of the royalty funds and interest that has accrued since April 30, 2022.

IPG respectfully requests that the Judges proceed to order a final distribution of royalties to IPG, MPA-represented Program Suppliers, and the Settling Devotional Claimants, based on the Licensing Section's recalculations, and requests that the Judges direct the Licensing Section to update their recalculations to reflect growth of the funds and interest that has accrued as of date of the final distribution as a part of that order.

# # #

Respectfully submitted,

Dated: October 24, 2022

\_\_\_\_\_/s/\_\_\_\_\_  
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Group

## CERTIFICATE OF SERVICE

I certify that on October 24, 2022, I caused a copy of the foregoing pleading to be served on all parties registered to receive notice by eCRB by filing through the eCRB filing system.

\_\_\_\_\_/s/\_\_\_\_\_  
Brian D. Boydston, Esq.

# Proof of Delivery

I hereby certify that on Monday, October 24, 2022, I provided a true and correct copy of the Independent Producers Group's Response To Restricted Order Further To Second Order Directing Recalculation Of Royalty Allocations to the following:

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

Settling Devotional Claimants (SDC), represented by Michael A Warley, served via E-Service at michael.warley@pillsburylaw.com

Motion Picture Association, Inc. (MPA), represented by Lucy H Plovnick, served via E-Service at lhp@msk.com

Signed: /s/ Brian D Boydston