

Before the  
UNITED STATES COPYRIGHT ROYALTY JUDGES  
Washington, D.C.

In the Matter of

**DETERMINATION OF RATES AND TERMS  
FOR DIGITAL PERFORMANCE OF SOUND  
RECORDINGS AND MAKING OF  
EPHEMERAL COPIES TO FACILITATE  
PERFORMANCES (WEB VI)**

**Docket No. 23-CRB-0012-WR  
(2026-2030)**

**EXPEDITED REQUEST OF SIRIUS XM RADIO LLC AND PANDORA MEDIA, LLC  
TO IMMEDIATELY DISABLE ECRB ACCESS TO PUBLIC WRITTEN DIRECT  
STATEMENT VOL. II (DOCKET NO. 43708)**

Sirius XM Radio LLC and Pandora Media, LLC (collectively the “Company”) hereby respectfully request that the Copyright Royalty Judges immediately disable public eCRB access to the public version of Volume II of its Written Direct Statement submitted on September 17, 2024 and posted to eCRB on September 18, 2024 at Docket No. 43708. The Company has learned today that the public version of the Written Direct Testimony of Fiona Scott Morton, which is contained within Volume II, inadvertently reveals certain material that is designated as restricted under the Protective Order in the proceeding (Docket No. 43647) and that therefore should have been redacted.

The Company is in the process of re-reviewing the Morton testimony to ensure that all restricted information is properly redacted, and will submit a motion to the Judges tomorrow, September 24, 2024, identifying the added redactions and seeking leave to file the corrected version. Until that time, as a precaution to avoid any harm that could result from further public access to the restricted information, we respectfully request that Docket No. 43708 be removed from eCRB.

September 23, 2024

Respectfully submitted,

/s/ Benjamin Marks

Benjamin E. Marks (N.Y. Bar No. 2912921)

Todd Larson (N.Y. Bar No. 4358438)

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, NY 10153

Tel: (212) 310-8170

Fax: (212) 310-8007

benjamin.marks@weil.com

todd.larson@weil.com

*Counsel for Sirius XM Radio LLC and Pandora  
Media, LLC*

# Proof of Delivery

I hereby certify that on Monday, September 23, 2024, I provided a true and correct copy of the Expedited Request of Sirius XM Radio LLC And Pandora Media, LLC To Immediately Disable eCRB Access To Public Written Direct Statement Vol. II (Docket No. 43708) to the following:

College Broadcasters, Inc., represented by Seth D. Greenstein, served via E-Service at sgreenstein@constantinecannon.com

Educational Media Foundation, represented by Keenan P Adamchak, served via E-Service at kadamchak@wbklaw.com

George Johnson dba Geo Music, represented by George D Johnson, served via E-Service at george@georgejohnson.com

National Religious Broadcasters Music License Committee, represented by Karyn K Ablin, served via E-Service at ablin@fhhlaw.com

Public Broadcasting Entities, represented by David P Mattern, served via E-Service at dmattern@kslaw.com

SoundExchange Joint Petitioners, represented by Scott Edelman, served via E-Service at sedelman@milbank.com

SoundExchange, Inc., represented by Steven R. Englund, served via E-Service at SEnglund@jenner.com

The National Association of Broadcasters, represented by Joseph R. Wetzel, served via E-Service at joe.wetzel@lw.com

Word Collections, Inc., represented by Eric B Goldberg, served via E-Service at eric@wordcollections.com

Signed: /s/ Todd Larson