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Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of	)	
	)	
Distribution of 2014-2017	)	Docket No. 16-CRB-0010-SD
Satellite Royalty Funds	)	(2014-2017)
	)	

MULTIGROUP CLAIMANTS' SECOND MOTION TO AMEND
PETITION TO PARTICIPATE IN DISTRIBUTION PROCEEDINGS

On March 11, 2019, Multigroup Claimants (MC) filed a Petition to Participate in the above-referenced proceeding, pursuant to the *Notice Announcing Commencement of Distribution Proceedings With Request for Petitions to Participate,* published by the Copyright Royalty Board, Library of Congress, at 84 Fed. Reg. 2931 (Feb. 8, 2019).

On June 16, 2019, MC moved to amend its *Petition to Participate*. Therein, legal counsel for MC explained that he had been recently contacted by one of the entities appearing on Exhibit A to such filing, purporting that it had previously notified such legal counsel that it was terminating its agreement with Independent Producers Group ("IPG") because efforts to contact IPG had been unavailing.[1] MC's counsel had no record of such communication. When queried by MC's legal counsel, such entity could not produce any evidence that such notice had actually been provided to MC's counsel, that any subsequent communications relating to the ostensible notice existed, or that other notices generally referenced in such notice had actually been previously provided by such entity.

[1] Such entity purportedly attempted to contact Independent Producers Group at a long-extinguished IPG address, despite notification from IPG twelve years prior that there had been a change of address for IPG, and despite proximately receiving multiple emails from IPG that it acknowledges to have received.

Notwithstanding the foregoing, MC moved to amend the *Petition to Participate* previously filed in this proceeding in order to remove all references to either "Jefferson Pilot Sports (cka Raycom Sports)" or "Raycom Sports". An *Amended Petition to Participate* was attached as Exhibit A. No party opposed MC's motion.

On July 31, 2019, the Judges nonetheless denied MC's motion without prejudice. Therein, the Judges cited a variety of bases for the denial, including:

1. An apparent confusion that the Exhibit A attached to the motion (MC's proposed *Amended Petition to Participate*) itself included an Exhibit A list of claimants.

2. Multigroup Claimants included neither a redlined-version of its claimant list nor evidence in the form of affidavits or emails to support the statements made in its Motion.[2]

3. Although the Motion proposed removal of claimants from MC's petition to participate (i.e., "Jefferson Pilot Sports (cka Raycom Sports)" or "Raycom Sports"), the Motion was silent on whether the affected claimant/claimants intended to withdraw from the proceeding, to represent themselves, or to join the petition to participate of another claimant representative.

4. The Motion was silent on whether or not the affected claimant/claimants were aware that MC was moving to strike them from the *Petition to Participate* and the effect that such action would have on the rights of the claimant/claimants to continue to pursue their royalty claims in this proceeding.

[2] Recent motions to amend petitions to participate in this and other proceedings have been granted by the Judges without the submission of either a redlined-version of the amended claimant list, or other evidence to support the statements made in such motions (see, e.g., *MPAA-Represented Program Suppliers' Motion to Amend Joint Petition to Participate* (May 24, 2019), and resulting *Order Granting MPAA-Represented Program Suppliers' Motion to Amend Joint Petition to Participate* (July 25, 2019)).

In response thereto, MC resubmits its motion, attaching as **Exhibit 1** its *Amended Petition to Participate*. As should be evident, the *Amended Petition to Participate* references and attaches an Exhibit A to such petition.

Additionally, MC attaches an email string between the undersigned and Ellenann Yelverton, the purported representative of Raycom Sports. See **Exhibit 2**. The initial email in such string is dated May 16, 2019, and the last email is dated June 16, 2019. Therein, MC informed Raycom Sports on June 16, 2019, i.e., the day of MC's original filing, that MC had "filed a motion to amend our claims to remove Raycom".

MC does not provide a "redline" comparison between its original *Petition to Participate* and its proposed *Amended Petition to Participate*, and instead opts to provide evidence supporting its motion. Notwithstanding, the undersigned represents that the only difference between MC's original *Petition to Participate* and its proposed *Amended Petition to Participate* is the removal of reference to the 2015-2017 claims filed on behalf of "Jefferson Pilot Sports (cka Raycom Sports)" and "Raycom Sports".

As regards the Judges' query as to the intention of Raycom Sports to participate in the 2014-2017 cable/satellite proceedings, MC has no information regarding such matter. MC made the same inquiry, to which Raycom Sports refused to respond. See Exhibit 2 (June 7, 2019 email from Yelverton to Boydston). Notwithstanding, if Raycom Sports were to attempt to participate in these proceedings based on "July filings" made by Multigroup Claimants, such participation would be challenged and subject to dismissal based on Raycom Sports' earlier contention that it forwarded Independent Producers Group a notice of termination on February 16, 2012, then again on March 2, 2012. Consequently, any filings made pursuant to the then-terminated agreement with IPG for

calendar years 2013 and forward would have been, according to Raycom Sports, without authorization and invalid at the time of their making.[3]

Respectfully submitted,

Dated: August 14, 2019

_____/s/_____

Brian D. Boydston, Esq.
California State Bar No. 155614

PICK & BOYDSTON, LLP
10786 Le Conte Ave.
Los Angeles, California 90024
Telephone: (213)624-1996
Facsimile: (213)624-9073
Email: brianb@ix.netcom.com

Attorneys for Multigroup Claimants

[3] As noted, the February 16, 2012 notice of termination that Raycom Sports purports to have sent to IPG was forwarded to the incorrect address, despite prior notifications of IPG's updated address, and proximate communications from IPG reflecting IPG's updated address. Further, IPG's legal counsel (the undersigned) communicated that he had no record of having received the March 2, 2012 letter purportedly sent by Raycom Sports. Moreover, IPG has located several email communications to Raycom Sports personnel subsequent to March 2, 2012 to which no response was forthcoming indicating that a notice of termination had previously been sent. Consequently, filings made by IPG and/or MC subsequent to such dates were submitted with the good faith belief that such filings were authorized by Raycom Sports.

CERTIFICATE OF SERVICE

I hereby certify that on this 14th of August, 2019, a copy of the foregoing was provided to each of the parties on the attached service list via the Copyright Royalty Judges' eCRB electronic filing system.

_____/s/_____
Brian D. Boydston, Esq.

MPAA-REPRESENTED PROGRAM SUPPLIERS
Gregory O. Olaniran, Esq.
Lucy Holmes Plovnick, Esq.
MITCHELL SILBERBERG & KNUPP LLP
1818 n Street N.W., 8th Floor
Washington, DC 20036
Tel: 202-355-7817
goo@msk.com; lhp@msk.com

COMMERCIAL TELEVISION CLAIMANTS/
BROADCASTER CLAIMANTS GROUP
John I. Stewart, Esq.
Ann Mace, Esq.
David Ervin, Esq.
CROWELL & MORING LLP
1001 Pennsylvania Ave., NW
Washington, DC 20004-2595
Email: jstewart@crowell.com

MAJOR LEAGUE SOCCER, LLC
Edward S. Hammerman, Esq.
HAMMERMAN PLLC
5335 Wisconsin Avenue NW, #440
Washington, DC 20015
ted@copyrightroyaltiescom

SETTLING DEVOTIONAL CLAIMANTS
Arnold P. Lutzker, Esq.
LUTZKER & LUTZKER LLP
1233 20th Street, NW , Suite 703
Washington, DC 20036
Tel: 202-408-7600
arnie@lutzker.com

Matthew MacLean, Esq.
PILLSBURY WINTHROP SHAW PITTMAN LLP

1200 Seventeenth Street NW
Washington, DC 20036
Matthew.maclean@pillsburylaw.com

JOINT SPORTS CLAIMANTS

Daniel Cantor, Esq.
Michael E. Kientzle, Esq.
ARNOLD AND PORTER LLP
601 Massachusetts Ave., NW
Washington, DC 20001
Tel: 202-942-5000
Daniel.cantor@arnoldporter.com, Michael.kientzle@arnoldporter.com

Phillip R. Hochberg, Esq.
LAW OFFICES OF PHILLIP R. HOCHBERG
12505 Park Potomac Avenue, 6th Floor
Potomac, MD 20854
Tel: 301-230-6572
phochberg@shulmanrogers.com

Ritchie T. Thomas, Esq.
SQUIRE PATTON BOGGS
2550 M Street Northwest
Washington, DC 20037
Tel: 202-457-6000
Ritchie.thomas@squirepb.com

MUSIC CLAIMANTS

AMERICAN SOCIETY OF COMPOSERS, AUTHORS, AND PUBLISHERS
Samuel Mosenkis, Esq.
Jackson Wagener, Esq.
ASCAP
One Lincoln Plaza
1900 Broadway
New York, NY 10023
Tel: 212-621-6450
smosenkis@ascap.com; jwagener@ascap.com

BROADCAST MUSIC, INC.
Joseph J. Dimona, Esq.
7 World Trade Center
250 Greenwich Street
New York, NY 10007-0030
Tel: 212-220-3149
jdimona@bmi.com

DRINKER BIDDLE & REATH LLP
Brian A. Coleman, Esq.
Jennifer T. Criss, Esq.
1500 K Street, NW, Suite 1100
Washington, DC 20005
Tel: 202-842-8800
brian.coleman@dbr.com; Jennifer.criss@dbr.com

SESAC, INC.
John C. Beiter, Esq.
Beiter Law Firm, PLLC
P.O. Box 120433
Nashville, TN 37212
jbeiter@shackelfordlaw.net

Christos P. Badavas
SESAC
152 West 57th Street, 57th Floor
New York, NY 10019
Tel: 212-586-3450
cbadavas@sesac.com

GLOBAL MUSIC RIGHTS, LLC
Scott Zebrak
Oppenheim & Zebrak LLP
4530 Wisconsin Ave., NW, 5th Floor
Washington, D.C. 20015
scott@oandzlaw.com

CIRCLE OF GOD NETWORK, INC.
David Powell
P.O. Box 010950
Miami, FL 33101
Davidpowell008@yahoo.com

EXHIBIT “1”

Before the
COPYRIGHT ROYALTY JUDGES
Washington, D.C.

In the Matter of	)	
	)	
Distribution of 2014-2017	)	Docket No. 16-CRB-0010-SD
Satellite Royalty Funds	)	(2014-2017)
	)	

MULTIGROUP CLAIMANTS' AMENDED
PETITION TO PARTICIPATE IN DISTRIBUTION PROCEEDINGS

Multigroup Claimants (MC), pursuant to the *Notice Announcing Commencement of Distribution Proceedings With Request for Petitions to Participate,* published February 8, 2019 by the Copyright Royalty Board, Library of Congress, 84 Fed. Reg. 2931, hereby notifies the Copyright Royalty Judges as follows:

MC amends and maintains claims with respect to the 2015-2017 satellite royalty funds in the syndicated programming, sports programming, and devotional programming categories, and notifies the Copyright Royalty Judges of its intent to participate in Allocation and Distribution proceedings related thereto, for programming initially owned or controlled by those parties identified on the attached **Exhibit A**. It files this as a Joint Notice on behalf of itself and all the parties listed in the attachment hereto.

MC reserves the right to amend its list of represented participants as such amendments may be necessary and legally permissible. As of the date of the Petition to Participate, MC and its undersigned counsel certify that they have the authority and consent of each of the parties listed on the attachment to represent them in these satellite distribution proceedings. For purposes of clarification, certain of the parties assigned rights to MC, or made independent claims, for less than the aggregate of 2015-2017 calendar years. As the copyright owners and holders of programming broadcast on stations whose signals were carried on a distant signal basis during any time 2015 through 2017, MC and the parties listed on the attachment have a significant interest in the subject matter of these proceedings.

Respectfully submitted,

Dated: August 14, 2019

_____/s/_____

Brian D. Boydston, Esq.
California State Bar No. 155614

PICK & BOYDSTON, LLP
10786 Le Conte Ave.
Los Angeles, California 90024
Telephone: (213)624-1996
Facsimile: (213)624-9073
Email: brianb@ix.netcom.com

Attorneys for Multigroup Claimants

EXHIBIT A

Exhibit A to MULTIGROUP CLAIMANTS' Joint Petition to Participate in 2014-2017 Satellite Proceedings

	Claimant	Claim Year	Satellite Claim Number	Joint or Individual	Program Category:		
					Program Suppliers	Dev'l	Sports
1	Abrams Gentile Entertainment	2015	195	Joint	x		
2	Abrams Gentile Entertainment	2016	162	Joint	x		
3	Abrams Gentile Entertainment	2017	254	Joint	x		
4	Academy of Television Arts and Sciences	2015	195	Joint	x		
5	Academy of Television Arts and Sciences	2016	162	Joint	x		
6	Adams Golf	2015	195	Joint	x		
7	Adams Golf	2016	162	Joint	x		
8	Adams Golf	2017	254	Joint	x		
9	Advantage Media Group	2015	195	Joint	x		
10	Advantage Media Group	2016	162	Joint	x		
11	Advantage Media Group	2017	254	Joint	x		
12	As Seen On TV (cka Seen On TV LLC)	2015	195	Joint	x		
13	As Seen On TV (cka Seen On TV LLC)	2016	162	Joint	x		
14	As Seen On TV (cka Seen On TV LLC)	2017	254	Joint	x		
15	Atlantic Film Partners cka Baker Street Media Holdings	2016	162	Joint	x		
16	Atlantic Film Partners cka Baker Street Media Holdings	2017	254	Joint	x		

Exhibit A to MULTIGROUP CLAIMANTS' Joint Petition to Participate in 2014-2017 Satellite Proceedings

17	AVA Productions B.V.	2015	195	Joint	x		
18	AVA Productions B.V.	2016	162	Joint	x		
19	AVA Productions B.V.	2017	254	Joint	x		
20	Aviva International LLC (cka DAS Entertainment)	2015	195	Joint	x		
21	Aviva International LLC (cka DAS Entertainment)	2016	162	Joint	x		
22	Aviva International LLC (cka DAS Entertainment)	2017	254	Joint	x		
23	Azteca International Corporation	2015	195	Joint	x		x
24	Azteca International Corporation	2016	162	Joint	x		x
25	Azteca International Corporation	2017	254	Joint	x		x
26	Benny Hinn Ministeries	2015	195	Joint		x	
27	Benny Hinn Ministeries	2016	162	Joint		x	
28	Benny Hinn Ministeries	2017	254	Joint		x	
29	Best Direct (International) Ltd.	2015	195	Joint	x		
30	Best Direct (International) Ltd.	2016	162	Joint	x		
31	Best Direct (International) Ltd.	2017	254	Joint	x		
32	Big Events Company	2015	195	Joint	x		
33	Big Events Company	2016	162	Joint	x		
34	Big Events Company	2017	254	Joint	x		
35	BKS Entertainment (cka Role Entertainment)	2015	195	Joint	x		
36	BKS Entertainment (cka Role Entertainment)	2016	162	Joint	x		
37	BKS Entertainment (cka Role Entertainment)	2017	254	Joint	x		
38	Breakthrough Films & Television	2015	195	Joint	x		

Exhibit A to MULTIGROUP CLAIMANTS' Joint Petition to Participate in 2014-2017 Satellite Proceedings

39	Breakthrough Films & Television	2016	162	Joint	x		
40	Breakthrough Films & Television	2017	254	Joint	x		
41	BVTV, Inc.	2015	195	Joint	x		
42	BVTV, Inc.	2016	162	Joint	x		
43	BVTV, Inc.	2017	254	Joint	x		
44	C/F International, Inc.	2015	195	Joint	x		
45	C/F International, Inc.	2016	162	Joint	x		
46	C/F International, Inc.	2017	254	Joint	x		
47	Cappy Productions	2015	195	Joint	x		
48	Cappy Productions	2016	162	Joint	x		
49	Cappy Productions	2017	254	Joint	x		
50	Carol Reynolds Productions, Inc.	2015	195	Joint	x		
51	Carol Reynolds Productions, Inc.	2016	162	Joint	x		
52	Carol Reynolds Productions, Inc.	2017	254	Joint	x		
53	Central City Productions, Inc.	2015	195	Joint	x		
54	Central City Productions, Inc.	2016	162	Joint	x		
55	Central City Productions, Inc.	2017	254	Joint	x		
56	Cheaters International aka Bobby Goldstein Productions	2015	195	Joint	x		
57	Cheaters International aka Bobby Goldstein Productions	2016	162	Joint	x		
58	Cheaters International aka Bobby Goldstein Productions	2017	254	Joint	x		
59	Chesler/Perlmutter Productions	2015	195	Joint	x		
60	Chesler/Perlmutter Productions	2016	162	Joint	x		

Exhibit A to MULTIGROUP CLAIMANTS' Joint Petition to Participate in 2014-2017 Satellite Proceedings

61	Chesler/Perlmutter Productions	2017	254	Joint	x		
62	Cinemaginaire Inc.	2015	195	Joint	x		
63	Cinemaginaire Inc.	2016	162	Joint	x		
64	Cinemaginaire Inc.	2017	254	Joint	x		
65	Cinemavault Releasing Inc.	2015	195	Joint	x		
66	Cinemavault Releasing Inc.	2016	162	Joint	x		
67	Cinemavault Releasing Inc.	2017	254	Joint	x		
68	Cogeco Radio-Television, Inc.	2015	195	Joint	x		
69	Cogeco Radio-Television, Inc.	2016	162	Joint	x		
70	Cogeco Radio-Television, Inc.	2017	254	Joint	x		
71	Computer Personalities Systems, Inc.	2015	195	Joint	x		
72	Computer Personalities Systems, Inc.	2016	162	Joint	x		
73	Computer Personalities Systems, Inc.	2017	254	Joint	x		
74	Conus Communications	2015	195	Joint	x		
75	Conus Communications	2016	162	Joint	x		
76	Conus Communications	2017	254	Joint	x		
77	Daniel Hernandez Productions	2015	195	Joint	x		
78	Daniel Hernandez Productions	2016	162	Joint	x		
79	Daniel Hernandez Productions	2017	254	Joint	x		
80	David Finch Distribution Ltd. fka David Finch Associates	2015	195	Joint	x		

Exhibit A to MULTIGROUP CLAIMANTS' Joint Petition to Participate in 2014-2017 Satellite Proceedings

81	David Finch Distribution Ltd. fka David Finch Associates	2016	162	Joint	x		
82	David Finch Distribution Ltd. fka David Finch Associates	2017	254	Joint	x		
83	Direct 2U Network, Inc.	2015	195	Joint	x		
84	Direct 2U Network, Inc.	2016	162	Joint	x		
85	Direct 2U Network, Inc.	2017	254	Joint	x		
86	Direct Cinema, Ltd.	2015	195	Joint	x		
87	Direct Cinema, Ltd.	2016	162	Joint	x		
88	Direct Cinema, Ltd.	2017	254	Joint	x		
89	Distraction Formats	2015	195	Joint	x		
90	Distraction Formats	2016	162	Joint	x		
91	Distraction Formats	2017	254	Joint	x		
92	Dragon Tales Productions	2015	195	Joint	x		
93	Dragon Tales Productions	2016	162	Joint	x		
94	Dragon Tales Productions	2017	254	Joint	x		
95	Eagle Mountain Int'l Church dba Kenneth Copeland Ministeries	2015	195	Joint		x	
96	Eagle Mountain Int'l Church dba Kenneth Copeland Ministeries	2016	162	Joint		x	
97	Eagle Mountain Int'l Church dba Kenneth Copeland Ministeries	2017	254	Joint		x	
98	Filmline International 1999 Inc.	2015	195	Joint	x		
99	Filmline International 1999 Inc.	2016	162	Joint	x		
100	Filmline International 1999 Inc.	2017	254	Joint	x		
101	Fishing University LLC	2015	195	Joint	x		

Exhibit A to MULTIGROUP CLAIMANTS' Joint Petition to Participate in 2014-2017 Satellite Proceedings

102	Fishing University LLC	2016	162	Joint	x		
103	Fishing University LLC	2017	254	Joint	x		
104	Fitness Quest, Inc.	2015	195	Joint	x		
105	Fitness Quest, Inc.	2016	162	Joint	x		
106	Fitness Quest, Inc.	2017	254	Joint	x		
107	Five Star Productions aka 5 Star Productions	2015	195	Joint	x		
108	Five Star Productions aka 5 Star Productions	2016	162	Joint	x		
109	Five Star Productions aka 5 Star Productions	2017	254	Joint	x		
110	Flesh and Blood Inc.	2015	195	Joint	x		
111	Flesh and Blood Inc.	2016	162	Joint	x		
112	Flesh and Blood Inc.	2017	254	Joint	x		
113	Florentine Films/Hott Productions, Inc.	2015	195	Joint	x		
114	Florentine Films/Hott Productions, Inc.	2016	162	Joint	x		
115	Florentine Films/Hott Productions, Inc.	2017	254	Joint	x		
116	Freewheelin' Films, Ltd.	2015	195	Joint	x		
117	Freewheelin' Films, Ltd.	2016	162	Joint	x		
118	Freewheelin' Films, Ltd.	2017	254	Joint	x		
119	Funimation	2015	195	Joint	x		
120	Funimation	2016	162	Joint	x		
121	Funimation	2017	254	Joint	x		
122	Global Response LLC	2015	195	Joint	x		
123	Global Response LLC	2016	162	Joint	x		
124	Global Response LLC	2017	254	Joint	x		
125	Gorky Studios	2015	195	Joint	x		
126	Gorky Studios	2016	162	Joint	x		
127	Gorky Studios	2017	254	Joint	x		

128	Grandolph Juravic Entertainment, LLC	2015	195	Joint	x		
129	Grandolph Juravic Entertainment, LLC	2016	162	Joint	x		
130	Grandolph Juravic Entertainment, LLC	2017	254	Joint	x		
131	Great Plains National Instructional Library (cka Smarterville, Inc.)	2015	195	Joint	x		
132	Great Plains National Instructional Library (cka Smarterville, Inc.)	2016	162	Joint	x		
133	Great Plains National Instructional Library (cka Smarterville, Inc.)	2017	254	Joint	x		
134	Greenlight International B.V.	2015	195		x		
135	GTS Records	2015	195	Joint	x		
136	GTS Records	2016	162	Joint	x		
137	GTS Records	2017	254	Joint	x		
138	Healthy TV, Inc.	2015	195	Joint	x		
139	Healthy TV, Inc.	2016	162	Joint	x		
140	Healthy TV, Inc.	2017	254	Joint	x		
141	HLB Productions	2015	195	Joint	x		
142	HLB Productions	2016	162	Joint	x		
143	HLB Productions	2017	254	Joint	x		
144	Home Enterprises	2015	195	Joint	x		
145	Home Enterprises	2016	162	Joint	x		
146	Home Enterprises	2017	254	Joint	x		
147	Imagex Ltd.	2015	195	Joint	x		
148	Imagex Ltd.	2016	162	Joint	x		
149	Imagex Ltd.	2017	254	Joint	x		
150	InCA Productions	2015	195	Joint	x		

Exhibit A to MULTIGROUP CLAIMANTS' Joint Petition to Participate in 2014-2017 Satellite Proceedings

151	InCA Productions	2016	162	Joint	x		
152	InCA Productions	2017	254	Joint	x		
153	Inner World Video	2015	195	Joint	x		
154	Inner World Video	2016	162	Joint	x		
155	Inner World Video	2017	254	Joint	x		
156	Instant Amoureax, Inc.	2015	195	Joint	x		
157	Instant Amoureax, Inc.	2016	162	Joint	x		
158	Instant Amoureax, Inc.	2017	254	Joint	x		
159	IWV Media Group, Inc.	2015	195	Joint	x	x	
160	IWV Media Group, Inc.	2016	162	Joint	x	x	
161	IWV Media Group, Inc.	2017	254	Joint	x	x	
162	Jack Van Impe Ministries International	2015	195	Joint		x	
163	Jack Van Impe Ministries International	2016	162	Joint		x	
164	Jack Van Impe Ministries International	2017	254	Joint		x	
165	JCS Entertainment II	2015	195	Joint	x		
166	JCS Entertainment II	2016	162	Joint	x		
167	JCS Entertainment II	2017	254	Joint	x		
168	K2 Media Group	2015	195	Joint	x	x	
169	K2 Media Group	2016	162	Joint	x	x	
170	K2 Media Group	2017	254	Joint	x	x	
171	Kevin Spencer, Inc.	2015	195	Joint	x		
172	Kevin Spencer, Inc.	2016	162	Joint	x		
173	Kevin Spencer, Inc.	2017	254	Joint	x		
174	Kid Friendly Productions	2015	195	Joint	x		
175	Kid Friendly Productions	2016	162	Joint	x		
176	Kid Friendly Productions	2017	254	Joint	x		
177	King Motion Picture Corporation	2015	195	Joint	x		

Exhibit A to MULTIGROUP CLAIMANTS' Joint Petition to Participate in 2014-2017 Satellite Proceedings

178	King Motion Picture Corporation	2016	162	Joint	x		
179	King Motion Picture Corporation	2017	254	Joint	x		
180	Knight Enterprises	2016	162	Joint	x		
181	Knight Enterprises	2017	254	Joint	x		
182	Knight Scenes Incorporated	2015	195	Joint	x		
183	Knight Scenes Incorporated	2016	162	Joint	x		
184	Knight Scenes Incorporated	2017	254	Joint	x		
185	LaFonda Partners	2015	195	Joint	x		
186	LaFonda Partners	2016	162	Joint	x		
187	LaFonda Partners	2017	254	Joint	x		
188	Laura Cadleux, Inc.	2015	195	Joint	x		
189	Laura Cadleux, Inc.	2016	162	Joint	x		
190	Laura Cadleux, Inc.	2017	254	Joint	x		
191	Lawrence Welk Syndication	2015	195	Joint	x		
192	Lawrence Welk Syndication	2016	162	Joint	x		
193	Lawrence Welk Syndication	2017	254	Joint	x		
194	Le Confessional, Inc.	2015	195	Joint	x		
195	Le Confessional, Inc.	2016	162	Joint	x		
196	Le Confessional, Inc.	2017	254	Joint	x		
197	Le Pain, Inc.	2015	195	Joint	x		
198	Le Pain, Inc.	2016	162	Joint	x		
199	Le Pain, Inc.	2017	254	Joint	x		
200	Les Productions Videofilms Limitee	2015	195	Joint	x		
201	Les Productions Videofilms Limitee	2016	162	Joint	x		
202	Les Productions Videofilms Limitee	2017	254	Joint	x		
203	Libra Films	2015	195	Joint	x		
204	Libra Films	2016	162	Joint	x		

205	Libra Films	2017	254	Joint	x		
206	Life Outreach International	2015	195	Joint		x	
207	Life Outreach International	2016	162	Joint		x	
208	Life Outreach International	2017	254	Joint		x	
209	Light Duty Productions	2015	195	Joint	x		
210	Light Duty Productions	2016	162	Joint	x		
211	Light Duty Productions	2017	254	Joint	x		
212	Link Television Entertainment (acquired in part by Classic Media TV)	2015	195	Joint	x		
213	Link Television Entertainment (acquired in part by Classic Media TV)	2016	162	Joint	x		
214	Link Television Entertainment (acquired in part by Classic Media TV)	2017	254	Joint	x		
215	Little M Productions	2015	195	Joint	x		
216	Little M Productions	2016	162	Joint	x		
217	Little M Productions	2017	254	Joint	x		
218	Magus Entertainment	2015	195	Joint	x		
219	Magus Entertainment	2016	162	Joint	x		
220	Magus Entertainment	2017	254	Joint	x		
221	Mansfield Television Distribution	2015	195	Joint	x		
222	Mansfield Television Distribution	2016	162	Joint	x		
223	Mansfield Television Distribution	2017	254	Joint	x		
224	Mark Anthony Entertainment	2015	195	Joint	x		
225	Mark Anthony Entertainment	2016	162	Joint	x		
226	Mark Anthony Entertainment	2017	254	Joint	x		

227	Mentorn Barraclough Carey Productions Ltd.	2015	195	Joint	x		
228	Mentorn Barraclough Carey Productions Ltd.	2016	162	Joint	x		
229	Mentorn Barraclough Carey Productions Ltd.	2017	254	Joint	x		
230	Mentorn International Distribution Ltd.	2015	195	Joint	x		
231	Mentorn International Distribution Ltd.	2016	162	Joint	x		
232	Mentorn International Distribution Ltd.	2017	254	Joint	x		
233	Meredith Corporation	2015	195	Joint	x		
234	Meredith Corporation	2016	162	Joint	x		
235	Meredith Corporation	2017	254	Joint	x		
236	Midwest Center for Stress & Anxiety, Inc.	2015	195	Joint	x		
237	Midwest Center for Stress & Anxiety, Inc.	2016	162	Joint	x		
238	Midwest Center for Stress & Anxiety, Inc.	2017	254	Joint	x		
239	Minotaur International Ltd. (acquired by Target Entertainment Group)	2015	195	Joint	x		
240	Minotaur International Ltd. (acquired by Target Entertainment Group)	2016	162	Joint	x		
241	Minotaur International Ltd. (acquired by Target Entertainment Group)	2017	254	Joint	x		
242	Mojo Brands Media LLC	2015	195	Joint	x		
243	Mojo Brands Media LLC	2016	162	Joint	x		

244	Mojo Brands Media LLC	2017	254	Joint	x		
245	MoneyTV.Net Inc.	2016	162	Joint	x		
246	MoneyTV.Net Inc.	2017	254	Joint	x		
247	Montreal vu par, Inc.	2015	195	Joint	x		
248	Montreal vu par, Inc.	2016	162	Joint	x		
249	Montreal vu par, Inc.	2017	254	Joint	x		
250	Mr. Showbiz Productions	2015	195	Joint	x		
251	Mr. Showbiz Productions	2016	162	Joint	x		
252	Mr. Showbiz Productions	2017	254	Joint	x		
253	Multimedia Group of Canada	2015	195	Joint	x		
254	Multimedia Group of Canada	2016	162	Joint	x		
255	Multimedia Group of Canada	2017	254	Joint	x		
256	Nabisco, Inc.	2015	195	Joint	x		
257	Nabisco, Inc.	2016	162	Joint	x		
258	Nabisco, Inc.	2017	254	Joint	x		
259	National Academy of Television Arts and Sciences	2015	195	Joint	x		
260	National Academy of Television Arts and Sciences	2016	162	Joint	x		
261	National Academy of Television Arts and Sciences	2017	254	Joint	x		
262	National Review, Inc. (Firing Line division)	2015	195	Joint	x		
263	National Review, Inc. (Firing Line division)	2016	162	Joint	x		
264	National Review, Inc. (Firing Line division)	2017	254	Joint	x		
265	Nelson Davis Television Productions	2015	195	Joint	x		
266	Nelson Davis Television Productions	2016	162	Joint	x		

Exhibit A to MULTIGROUP CLAIMANTS' Joint Petition to Participate in 2014-2017 Satellite Proceedings

267	Nelson Davis Television Productions	2017	254	Joint	x		
268	Network Programs International	2015	195	Joint	x		
269	Network Programs International	2016	162	Joint	x		
270	Network Programs International	2017	254	Joint	x		
271	New Visions Syndication, Inc.	2015	195	Joint	x		
272	New Visions Syndication, Inc.	2016	162	Joint	x		
273	New Visions Syndication, Inc.	2017	254	Joint	x		
274	Nu/Hart Hair Clinics, Inc.	2015	195	Joint	x		
275	Nu/Hart Hair Clinics, Inc.	2016	162	Joint	x		
276	Nu/Hart Hair Clinics, Inc.	2017	254	Joint	x		
277	Nu/Hart Hair Solutions, Inc.	2015	195	Joint	x		
278	Nu/Hart Hair Solutions, Inc.	2016	162	Joint	x		
279	Nu/Hart Hair Solutions, Inc.	2017	254	Joint	x		
280	NVC Arts	2015	195	Joint	x		
281	Ontario Educational Communications Authority	2015	195	Joint	x		
282	Ontario Educational Communications Authority	2016	162	Joint	x		
283	Ontario Educational Communications Authority	2017	254	Joint	x		
284	Over the Edge-TV	2015	195	Joint	x		
285	Over the Edge-TV	2016	162	Joint	x		
286	Over the Edge-TV	2017	254	Joint	x		
287	Paradigm Pictures Corporation	2015	195	Joint	x		
288	Paradigm Pictures Corporation	2016	162	Joint	x		

Exhibit A to MULTIGROUP CLAIMANTS' Joint Petition to Participate in 2014-2017 Satellite Proceedings

289	Paradigm Pictures Corporation	2017	254	Joint	x		
290	Peter Rodgers Organization	2015	195	Joint	x		
291	Peter Rodgers Organization	2016	162	Joint	x		
292	Peter Rodgers Organization	2017	254	Joint	x		
293	Phil Slater Associates	2015	195	Joint	x		
294	Phil Slater Associates	2016	162	Joint	x		
295	Phil Slater Associates	2017	254	Joint	x		
296	PMT, Ltd.	2015	195	Joint	x		
297	PMT, Ltd.	2016	162	Joint	x		
298	PMT, Ltd.	2017	254	Joint	x		
299	Popular History Company	2015	195	Joint	x		
300	Popular History Company	2016	162	Joint	x		
301	Popular History Company	2017	254	Joint	x		
302	Production le Jour, Inc.	2015	195	Joint	x		
303	Production le Jour, Inc.	2016	162	Joint	x		
304	Production le Jour, Inc.	2017	254	Joint	x		
305	Production le Siege, Inc.	2015	195	Joint	x		
306	Production le Siege, Inc.	2016	162	Joint	x		
307	Production le Siege, Inc.	2017	254	Joint	x		
308	Productions Pixcom, Inc.	2015	195	Joint	x		
309	Productions Pixcom, Inc.	2016	162	Joint	x		
310	Productions Pixcom, Inc.	2017	254	Joint	x		
311	Promark Television Inc.	2015	195	Joint	x	x	
312	Promark Television Inc.	2016	162	Joint	x	x	
313	Promark Television Inc.	2017	254	Joint	x	x	
314	Psychic Readers Network	2015	195	Joint	x		
315	Psychic Readers Network	2016	162	Joint	x		
316	Psychic Readers Network	2017	254	Joint	x		
317	Quartet International	2015	195	Joint	x		
318	Quartet International	2016	162	Joint	x		
319	Quartet International	2017	254	Joint	x		

320	Queen Light Productions	2015	195	Joint	x		
321	Queen Light Productions	2016	162	Joint	x		
322	Queen Light Productions	2017	254	Joint	x		
323	Questar Video aka Questar, Inc.	2015	195	Joint	x		
324	Questar Video aka Questar, Inc.	2016	162	Joint	x		
325	Questar Video aka Questar, Inc.	2017	254	Joint	x		
326	Red Apple Entertainment Corporation (cka Frantic Films)	2015	195	Joint	x		
327	Red Apple Entertainment Corporation (cka Frantic Films)	2016	162	Joint	x		
328	Red Apple Entertainment Corporation (cka Frantic Films)	2017	254	Joint	x		
329	Ron Hazelton Productions, Inc.	2015	195	Joint	x		
330	Ron Hazelton Productions, Inc.	2016	162	Joint	x		
331	Ron Hazelton Productions, Inc.	2017	254	Joint	x		
332	S Entertainment (1997) Inc.	2015	195	Joint	x		
333	S Entertainment (1997) Inc.	2016	162	Joint	x		
334	S Entertainment (1997) Inc.	2017	254	Joint	x		
335	S Entertainment Holdings Inc.	2015	195	Joint	x		
336	S Entertainment Holdings Inc.	2016	162	Joint	x		
337	S Entertainment Holdings Inc.	2017	254	Joint	x		
338	S Entertainment Inc.	2015	195	Joint	x		
339	S Entertainment Inc.	2016	162	Joint	x		

340	S Entertainment Inc.	2017	254	Joint	x		
341	Salem Baptist Church of Chicago, Inc.	2015	195	Joint		x	
342	Salem Baptist Church of Chicago, Inc.	2016	162	Joint		x	
343	Salem Baptist Church of Chicago, Inc.	2017	254	Joint		x	
344	Sarrazin Couture Entertainment	2015	195	Joint	x		
345	Sarrazin Couture Entertainment	2016	162	Joint	x		
346	Sarrazin Couture Entertainment	2017	254	Joint	x		
347	Satsuki Ina (aka Hesono O Productions)	2015	195	Joint	x		
348	Satsuki Ina (aka Hesono O Productions)	2016	162	Joint	x		
349	Satsuki Ina (aka Hesono O Productions)	2017	254	Joint	x		
350	SC Entertainment holdings Inc.	2015	195	Joint	x		
351	SC Entertainment holdings Inc.	2016	162	Joint	x		
352	SC Entertainment holdings Inc.	2017	254	Joint	x		
353	SC Entertainment International Inc.	2015	195	Joint	x		
354	SC Entertainment International Inc.	2016	162	Joint	x		
355	SC Entertainment International Inc.	2017	254	Joint	x		
356	Searchlight Entertainment	2015	195	Joint	x		

357	Searchlight Entertainment	2016	162	Joint	x		
358	Searchlight Entertainment	2017	254	Joint	x		
359	Seen On TV LLC dba Seen On TV	2015	195	Joint	x		
360	Seen On TV LLC dba Seen On TV	2016	162	Joint	x		
361	Seen On TV LLC dba Seen On TV	2017	254	Joint	x		
362	Shadow Lake Productions	2015	195	Joint	x		
363	Shadow Lake Productions	2016	162	Joint	x		
364	Shadow Lake Productions	2017	254	Joint	x		
365	Simply Fishing, Inc.	2015	195	Joint	x		
366	Simply Fishing, Inc.	2016	162	Joint	x		
367	Simply Fishing, Inc.	2017	254	Joint	x		
368	Sound Venture Productions Ottawa Ltd.	2015	195	Joint	x		
369	Sound Venture Productions Ottawa Ltd.	2016	162	Joint	x		
370	Sound Venture Productions Ottawa Ltd.	2017	254	Joint	x		
371	St. Jude Children's Research Hospital	2015	195	Joint	x		
372	St. Jude Children's Research Hospital	2016	162	Joint	x		
373	St. Jude Children's Research Hospital	2017	254	Joint	x		
374	Streamline Pictures	2015	195	Joint	x		
375	Streamline Pictures	2016	162	Joint	x		
376	Streamline Pictures	2017	254	Joint	x		
377	Tapestry International Ltd.	2015	195	Joint	x		
378	Tapestry International Ltd.	2016	162	Joint	x		
379	Tapestry International Ltd.	2017	254	Joint	x		

380	Team Communications Group aka Team Entertainment Group	2015	195	Joint	x		
381	TearDrop Golf (acquired by Digital Info Security Co.)	2015	195	Joint	x		
382	TearDrop Golf (acquired by Digital Info Security Co.)	2016	162	Joint	x		
383	TearDrop Golf (acquired by Digital Info Security Co.)	2017	254	Joint	x		
384	The City Productions Inc.	2015	195	Joint	x		
385	The City Productions Inc.	2016	162	Joint	x		
386	The City Productions Inc.	2017	254	Joint	x		
387	The Friendly Kitchen Company	2015	195	Joint	x		
388	The Friendly Kitchen Company	2016	162	Joint	x		
389	The Friendly Kitchen Company	2017	254	Joint	x		
390	The Media Source	2015	195	Joint	x		
391	The Media Source	2016	162	Joint	x		
392	The Media Source	2017	254	Joint	x		
393	Thomas Horton Associates	2015	195	Joint	x		
394	Thomas Horton Associates	2016	162	Joint	x		
395	Thomas Horton Associates	2017	254	Joint	x		
396	Thump Records, Inc.	2016	162	Joint	x		
397	Thump Records, Inc.	2017	254	Joint	x		
398	Timberwolf Productions	2015	195	Joint	x		
399	Timberwolf Productions	2016	162	Joint	x		
400	Timberwolf Productions	2017	254	Joint	x		
401	Tremendous Entertainment	2015	195	Joint	x		
402	Tremendous Entertainment	2016	162	Joint	x		
403	Tremendous Entertainment	2017	254	Joint	x		

404	TV Matters cka Film Matters	2015	195	Joint	x		
405	TV Matters cka Film Matters	2016	162	Joint	x		
406	TV Matters cka Film Matters	2017	254	Joint	x		
407	TVD Productions	2015	195	Joint	x		
408	TVD Productions	2016	162	Joint	x		
409	TVD Productions	2017	254	Joint	x		
410	United Negro College Fund	2015	195	Joint	x		
411	United Negro College Fund	2016	162	Joint	x		
412	United Negro College Fund	2017	254	Joint	x		
413	Video Tours Inc.	2015	195	Joint	x		
414	Video Tours Inc.	2016	162	Joint	x		
415	Video Tours Inc.	2017	254	Joint	x		
416	Video/Media Distribution Inc.	2015	195	Joint	x		
417	Video/Media Distribution Inc.	2016	162	Joint	x		
418	Video/Media Distribution Inc.	2017	254	Joint	x		
419	Watercourse Road Productions LLC	2015	195	Joint	x		
420	Watercourse Road Productions LLC	2016	162	Joint	x		
421	Watercourse Road Productions LLC	2017	254	Joint	x		
422	Westwind Pictures Ltd. (fka 591755 Saskatchewan Ltd.)	2015	195	Joint	x		
423	Westwind Pictures Ltd. (fka 591755 Saskatchewan Ltd.)	2016	162	Joint	x		
424	Westwind Pictures Ltd. (fka 591755 Saskatchewan Ltd.)	2017	254	Joint	x		
425	Whamo Entertainment	2015	195	Joint	x		
426	Whamo Entertainment	2016	162	Joint	x		
427	Whamo Entertainment	2017	254	Joint	x		
428	Whidbey Island Films, Inc.	2015	195	Joint	x		
429	Whidbey Island Films, Inc.	2016	162	Joint	x		

430	Whidbey Island Films, Inc.	2017	254	Joint	x		
431	Willie Wilson Productions, Inc.	2015	195	Joint	x		
432	Willie Wilson Productions, Inc.	2016	162	Joint	x		
433	Willie Wilson Productions, Inc.	2017	254	Joint	x		
434	Winchester Entertainment PLC (cka Content Media Corp.)	2015	195	Joint	x		
435	Winchester Entertainment PLC (cka Content Media Corp.)	2016	162	Joint	x		
436	Winchester Entertainment PLC (cka Content Media Corp.)	2017	254	Joint	x		
437	World Changers Church International, Inc. dba Creflo A. Dollar Ministeries	2015	195	Joint		x	
438	World Changers Church International, Inc. dba Creflo A. Dollar Ministeries	2016	162	Joint		x	
439	World Changers Church International, Inc. dba Creflo A. Dollar Ministeries	2017	254	Joint		x	
440	World Events Productions	2015	195	Joint	x		
441	World Events Productions	2016	162	Joint	x		
442	World Events Productions	2017	254	Joint	x		
443	Worldwide Subsidy Group LLC	2015	195	Joint	x	x	x
444	Worldwide Subsidy Group LLC	2016	162	Joint	x	x	x

445	Worldwide Subsidy Group LLC	2017	254	Joint	x	x	x

EXHIBIT “2”

From: "Brian D. Boydston, Esq." <brianb@ix.netcom.com...
To: "Yelverton,Ellenann" <eyelverton@RaycomMedia.com>
Subject: RE: Raycom Sports
Date: Jun 16, 2019 8:47 AM

Dear Ms. Yelverton,

We filed a motion to amend our claims to remove Raycom.

Brian Boydston

-----Original Message-----
From: "Yelverton, Ellenann"
Sent: Jun 7, 2019 4:18 PM
To: "Brian D. Boydston, Esq."
Subject: RE: Raycom Sports

Please confirm you have withdrawn the unauthorized claims. I do not need to provide you anything further. You have no documentation to make these claims, so please provide withdrawals Monday.

From: Brian D. Boydston, Esq. <brianb@ix.netcom.com>
Sent: Friday, June 07, 2019 2:06 AM
To: Yelverton, Ellenann <eyelverton@RaycomMedia.com>
Subject: RE: Raycom Sports

Thank you for that.

Could you please provide me with the correspondence you said informed WSG on several occasions that Raycom Sports did not control the rights to ACC Basketball.

Also, could you please confirm whether Raycom Sports (or any affiliated entity) is making claim for 2014-2017 royalties?

Thank you.

Brian Boydston

-----Original Message-----
From: "Yelverton, Ellenann"
Sent: May 30, 2019 1:49 PM
To: "Brian D. Boydston, Esq."
Subject: RE: Raycom Sports

You have been provided with the all written correspondence in my possession. Please confirm you have withdraw any and all Raycom Sports related claims.

From: Brian D. Boydston, Esq. <brianb@ix.netcom.com>
Sent: Tuesday, May 21, 2019 1:27 PM
To: Yelverton, Ellenann <eyelverton@RaycomMedia.com>
Subject: RE: Raycom Sports

Ms. Yelverton,

A few things to wrap this up.

First, as I noted previously, could you please confirm whether there was subsequent correspondence relating to this matter, and if so forward that correspondence? As I stated, I have no record or recollection of this, nor does my client, but it seems likely that there could have been subsequent correspondence.

Further, in the correspondence dated in 2012 you indicated that WSG was informed on several occasions that Raycom Sports did not control the rights to ACC Basketball. I presume that any such communication would have been in writing as well, so could you please forward that information.

Although we will promptly withdraw any claims in the 2014-2017 proceedings based solely on your current contention that you sent a notice of termination in 2012 -- not an acknowledgment that the notice of termination was actually provided -- I am obliged to ask whether Raycom Sports (or any affiliated entity) is making claim for those 2014-2017 royalties?

Thanks,

Brian Boydston

-----Original Message-----
From: "Yelverton, Ellenann"
Sent: May 21, 2019 6:18 AM
To: "Brian D. Boydston, Esq."
Subject: RE: Raycom Sports

Yes, please withdraw any claims you assert for Raycom Sports and provide proof of such withdrawal. Thank you for handling this so quickly.

From: Brian D. Boydston, Esq. <brianb@ix.netcom.com>
Sent: Monday, May 20, 2019 7:41 PM
To: Yelverton, Ellenann <eyelverton@RaycomMedia.com>
Subject: RE: Raycom Sports

Thank you Ms. Yelverton.

I had completely forgotten about this (and, while I do not question the authenticity of your letters, I still don't recall them).

Are there any other subsequent letters from you to me on this matter?

As far as the claims, they are simple enough to withdraw, although understand that once that is done it cannot be undone; i.e., they would be forfeit by statute. I assume that is what you want, but given that it would extinguish rights with some value, please confirm it

Thanks,

Brian Boydston

-----Original Message-----
From: "Yelverton, Ellenann"
Sent: May 17, 2019 3:23 PM
To: "Brian D. Boydston, Esq."
Subject: RE: Raycom Sports

Please see the attached prior correspondence. Raycom and Gray merged in January of this year. Raycom Sports remains our subsidiary. I appreciate your prompt action on the matter.

Ellenann B. Yelverton
Gray Television, Inc.
Office: 334.229.0304
Email: ellenann.yelverton@gray.tv
Website: www.gray.tv
This message and any attachments may constitute an attorney-client communication and may contain information that is privileged, confidential, and/or attorney work product. Receipt by anyone other than the proper recipient(s) is not a waiver of any attorney-client, work product, or other applicable privilege. If you are not the intended recipient, any disclosure, copying, distribution, or use of any information contained in this message or any attachment is prohibited. If you have received this message in error, please do not read, copy, or forward. Also, please permanently delete all copies and any attachments and notify the sender immediately by replying to the message. Thank you.

-----Original Message-----
From: Brian D. Boydston, Esq. <brianb@ix.netcom.com>
Sent: Thursday, May 16, 2019 6:41 PM
To: ellenann.yelverton@gray.tv
Subject: Raycom Sports

Dear Ms. Yelverton,

I received the attached letter today, which references a prior letter you sent me in March of 2012.

My apologies, I have no recollection of receiving a letter from you before. Could you provide me with a copy of that prior letter?

Brian D. Boydston, Esq.
Pick & Boydston, LLP
2288 Westwood Blvd., Suite 212
Los Angeles, CA 90064
(424)293-0111

Ellenann B. Yelverton
Gray Television, Inc.
VP, Deputy General Counsel

May 14, 2019

Brian D. Boydston, Esq.
Pick & Boydston, LLP
2288 Westwood Blvd., Suite 212
Los Angeles, CA 90065

Via Federal Express

RE: Multigroup Claimants/Raycom Sports

Mr. Boydston:

It has come to my attention in my capacity as Deputy General Counsel to Gray Television, parent company to Raycom Sports Network, Inc. ("Raycom Sports"), that you have publicly held yourself out as counsel to Raycom Sports in federal filings. You must immediately cease and desist any actions that would indicate, expressly or implicitly, your or MC's representation of Raycom Sports.

Specifically, on March 11, 2019, Multigroup Claimants ("MC") filed a Petition to Participate in Distribution Proceedings In the Matter of Distribution of 2014-2017 Cable Royalty Funds, Docket No. 16-CRB-0009-CD (2014-2017) and a Petition to Participate in Distribution Proceedings in the Matter of Distribution of 2014-2017 Satellite Royalty Funds, Docket No. 16-CRB-0010-SD (2014-2017) (the "Fraudulent Claims"; the proceedings, the "Proceedings"). The Fraudulent Claims came under your signature and alleged that "MC maintains claims with respect to the 2015-2017 cable royalty funds … for programming initially owned or controlled by [Raycom Sports]." It further states that "MC and its undersigned counsel [Mr. Boydston] certify that they have the authority and consent of [Raycom Sports] in these … proceedings."

Raycom Sports has *not* given you or MC the authority nor the consent to file on its behalf in the Proceedings. In fact, you have been on explicit notice to cease all communication with Raycom Sports and/or its employees since my last letter to you in March 2012.

We trust you will immediately take all appropriate steps to retract the Fraudulent Claims as they relate to Raycom Sports, and will convey the same to MC. Raycom Sports reserves all rights available to it at law and at equity, including sanctions as appropriate.

Sincerely,

Ellenann B. Yelverton

cc: Hunter Nickell, CEO Raycom Sports Network, Inc.

RSA Tower, 20th Floor, 201 Monroe Street, Montgomery, AL 36104 | P 334.229.0304 F 334.956.7749
ellenann.yelverton@gray.tv | www.gray.tv

Proof of Delivery

I hereby certify that on Wednesday, August 14, 2019, I provided a true and correct copy of the MULTIGROUP CLAIMANTS' SECOND MOTION TO AMEND PETITION TO PARTICIPATE IN DISTRIBUTION PROCEEDINGS to the following:

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

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

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

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

Program Suppliers, represented by Gregory O Olaniran, served via Electronic Service at goo@msk.com

Devotional Claimants, represented by Arnold P Lutzker, served via Electronic Service at arnie@lutzker.com

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

circle god network inc d/b/a david powell, represented by david powell, served via Electronic Service at davidpowell008@yahoo.com

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

Joint Sports Claimants, represented by Robert A Garrett, served via Electronic Service at robert.garrett@apks.com

Signed: /s/ Brian D Boydston