

**Copyright Royalty Judges  
Washington, D.C.**

**Determination of rates & terms for  
Digital Performances of Sound Recordings  
By New Subscription Services & making  
Ephemeral Copies to Facilitate Those  
Performances (NSS IV)**

**Docket No. 19-CRB-0006-NSR  
(2021-2025)**

**INTRODUCTION MEMORANDUM TO THE WRITTEN DIRECT CASE  
OF CIRCLE GOD NETWORK INC.(MEMBERS) D/B/A DAVID POWELL**

CGN INC.(members) d/b/a David Powell as Pro Se counsel, respectfully submits this Introductory Memorandum to its written direct case in accordance w/ 37 CFR ss. 351.4. This memorandum describes the contents of CGN INC. (members) d/b/a David Powell written direct case and briefly state no testimony and no witnesses.

**CONTENTS OF CGN INC. (MEMBERS) D/B/A DAVID POWELL WRITTEN DIRECT  
CASE**

Volume 1 contains: (A) this Introductory Memorandum; (B) an index of CGN INC.'s no witnesses testimony; (C) an index of no CGN INC.'s exhibits; (D) CGN INC.'s Proposed % Rates and Terms (E) a certificate of service.

Volume 2 contains no written direct testimony of CGN INC.'s witnesses and or exhibits.

Pursuant to 37 CFR ss. 350.4(a), 351.4(a), and the Court's Order of October 23, 2019 CGN INC is filing an original, by electronic transmission ecrb.gov. of the material in Volume 1 and 2.

## **Volume 1**

### **A. Introductory Memorandum**

Summary of the no written testimony of CGN INC's.

### **B. An index of CGN INC.'s no witnesses testimony**

CGN INC.'s written direct case includes no written testimony and or no witnesses.

### **C. No designated past records and testimony**

CGN INC.'s written direct statement case includes no designated past records and no testimony records.

### **D. CGN INC.'s proposed rates and terms claimed**

CGN INC.'s written direct statement case includes in its claim its requested proposed rates and terms 10% for each year (2021-2025). Request a Full hearing.

### **E. Certificate of services**

**VOLUME 2**

**Respectfully submitted,**

**David Powell, Pro Se**

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**VOLUME 1(e)**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 19, 2019, a copy of the forgoing Memorandum to the written direct case CGN INC.'s was filed electronically using eCRB, which will automatically provide electronic service copies to all counsel of record who are registered to use eCRB, See 37 CFR ss. 303.6(h)(1).

**Signed: David Powell, Pro Se**

**PROOF OF DELIVERY**

**I hereby certify that on October 19, 2019 I provided a true and correct to:**

SoundExchange, Inc. represented by Steven Englund at [senglund@jenner.com](mailto:senglund@jenner.com)

Sirius XM Radio Inc. represented by Todd Larson at [Todd.larson@weil.com](mailto:Todd.larson@weil.com)

**Signed: /s/ David Powell, Pro Se**

## Proof of Delivery

I hereby certify that on Saturday, September 28, 2019, I provided a true and correct copy of the INTRODUCTION MEMORANDUM TO THE WRITTEN DIRECT CASE OF CIRCLE GOD NETWORK INC.(MEMBERS)D/B/A DAVID POWELL to the following:

SoundExchange, Inc., represented by Steven R. Englund, served via Electronic Service at [senglund@jenner.com](mailto:senglund@jenner.com)

Sirius XM Radio Inc., represented by Todd Larson, served via Electronic Service at [todd.larson@weil.com](mailto:todd.larson@weil.com)

Signed: /s/ david powell