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**INDEPENDENT PRODUCERS GROUP**

**-- IPG EXHIBITS 55-100, 400**

**-- SDC Motions to Strike Portions of  
IPG's Claims and Direct Case**

EXHIBIT NUMBER	DESCRIPTION	OBJECTION OF SDC (Y/N)
<b>IPG Claims</b>		
55	IPG 2000 "July claim" (filed by Artist Collections Group dba Worldwide Subsidy Group)	
56	IPG 2000 "July claim" (filed by Worldwide Subsidy Group dba Independent Producers Group)	
57	IPG 2001 "July claim" (filed by Artist Collections Group dba Worldwide Subsidy Group)	
58	IPG 2001 "July claim" (filed by Worldwide Subsidy Group dba Independent Producers Group)	
59	IPG 2002 "July claim" (filed by Artist Collections Group dba Worldwide Subsidy Group)	
60	IPG 2002 "July claim" (filed by Worldwide Subsidy Group dba Independent Producers Group)	
61	IPG 2003 "July claim" (filed by Artist Collections Group dba Worldwide Subsidy Group)	
62	IPG 2003 "July claim" (filed by Worldwide Subsidy Group dba Independent Producers Group)	
<b>IPG documents and electronic records produced</b>		
63	IPG spreadsheet re: claims, contracts, and correspondence produced to SDC	
64	Excerpt of IPG "Item 32 - - 2000-2003 Titles – Royalty Generating – w Distributor Information – Devotional Programming"	
<b>Galaz v. Oshita court records</b>		
65	LASC, Galaz v. Oshita; Los Angeles Superior Court, case no. BC 297015, Plaintiff's Judgment on Jury Verdict.	
66	LASC, Galaz v. Oshita; Los Angeles Superior Court, case no. BC 297015, Amended Order Compelling Transfer of All Limited Liability Company Assets . . . to Plaintiff".	

	<b>IPG Website</b>	
67	IPG website, printout of webpages from 01/21/01	
	<b>Benny Hinn Ministries</b>	
68	IPG/Benny Hinn Ministries agreement, 1999-prospectively.	
69	Benny Hinn Ministries, catalogue response.	
	<b>Creflo A. Dollar Ministries</b>	
70	IPG/Creflo A. Dollar Ministries agreement, 1999-prospectively.	
71	Creflo A. Dollar Ministries, catalogue response.	
72	Excerpt of "IPG Item 29 - - Claimant Broadcast files (Creflo Dollar Ministries)". Electronic file sent to Creflo A. Dollar Ministries requesting confirmation/rejection of broadcasts of Creflo Dollar program titles during 2000-2003.	
73	Creflo A. Dollar Ministries, broadcast verification.	
	<b>Kenneth Copeland Ministries</b>	
74	IPG/Kenneth Copeland Ministries agreement, 1997-prospectively.	
75	Kenneth Copeland Ministries, catalogue response #1 (initial production, then production of entire email string).	
76	Kenneth Copeland Ministries, catalogue response #2 (initial production, then production of entire email string).	
77	Excerpt of "IPG Item 29 - - Claimant Broadcast files (Kenneth Copeland Ministries)". Electronic file sent to Kenneth Copeland Ministries requesting confirmation/rejection of broadcasts of Kenneth Copeland Ministries' program titles during 2000-2003.	
78	Kenneth Copeland Ministries, broadcast verification.	
	<b>Willie Wilson Productions</b>	

79	IPG/Willie Wilson Productions agreement, 2000.	
80	IPG/Willie Wilson Productions agreement, 2001-prospectively.	
81	Excerpt of "IPG Item 29 - - Claimant Broadcast files (Willie Wilson Productions)". Electronic file sent to Willie Wilson Productions requesting confirmation/rejection of broadcasts of Willie Wilson Productions' program titles during 2000-2003.	
82	Willie Wilson Productions, broadcast verification.	
<b>Life Outreach International</b>		
83	IPG/Life Outreach International agreement, 2000.	
84	IPG/Life Outreach International agreement, 2001-prospectively.	
85	Life Outreach, catalogue response.	
86	Excerpt of "IPG Item 29 - - Claimant Broadcast files (Life Outreach)". Electronic file sent to Life Outreach requesting confirmation/rejection of broadcasts of Life Outreach program titles during 2000-2003.	
87	Life Outreach, broadcast verification.	
<b>Billy Graham Evangelistic Association</b>		
88	IPG/Billy Graham Evangelistic Association agreement, 2002; dated July 30, 2002.	
89	IPG/Billy Graham Evangelistic Association agreement, 2002; dated July 22, 2003.	
90	IPG/Billy Graham Evangelistic Association agreement, 2003; dated July 20, 2004.	
91	Billy Graham Evangelistic Association, letter to IPG dated 06/28/05.	
92	Billy Graham Evangelistic Association, catalogue response (initial production, then production of entire email string)	
93	Billy Graham Evangelistic Association, broadcast verification (initial production, then production of entire email string)	

94	Excerpt of "IPG Item 30 - - Unclaimed Broadcasts (Billy Graham Evangelistic Association)". Electronic file sent from Billy Graham Evangelistic Association to IPG confirming/rejecting broadcasts of BGEA program titles during 2001-2003.	
<b>Jack Van Impe Ministries</b>		
95	Jack Van Impe Ministry, catalogue response #1	
96	Excerpt of "IPG Item 27 - - Responses to 2000-2003 List of Titles (Jack Van Impe Ministries)". Electronic file sent from Jack Van Impe Ministries to IPG identifying claimed JVIM program titles.	
97	Jack Van Impe Ministries, catalogue response #2	
98	Excerpt of "IPG Item 29 - - Claimant Broadcast files (Jack Van Impe Ministries)". Electronic file sent to Jack Van Impe Ministries requesting confirmation/rejection of broadcasts of JVIM program titles during 2001-2003.	
99	Jack Van Impe Ministries, broadcast verification (initial production, then production of entire email string).	
<b>Salem Baptist Church</b>		
100	Salem Baptist Church, broadcast verification.	
400	Excerpt of "IPG Item 30 - - Unclaimed Broadcasts (Salem Baptist Church)". Electronic file sent from Salem Baptist Church to IPG confirming/rejecting broadcasts of Salem Baptist Church program titles during 2001-2002.	

# **EXHIBIT 55**

**CABLE CLAIM -- COPYRIGHT ARBITRATION ROYALTY PANEL**

Artist Collections Group, a California limited liability company, d/b/a Worldwide Subsidy Group does hereby file, on behalf of itself and all other parties listed on the attached Exhibit A, a claim to compulsory license fees pursuant to 17 U.S.C. Section 111(d)(4)(A) and 37 C.F.R. Section 252.3 for secondary transmissions by cable systems during the period January 1, 2000 through December 31, 2000. All parties in whose names the claim herein is filed have duly authorized the above party to make this filing on their behalf. In compliance with 37 C.F.R. Section 252.3, said claimant hereby furnishes the following information:

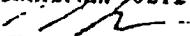
- 1 The full legal name of the persons or entities claiming compulsory license fees is.  
See attached Exhibit A.
- 2 The full address of the place of the claimants place of business, including phone/fax number is:  
9903 Santa Monica Blvd., #655, Beverly Hills, California 90212, (310) 446-1768 (phone), (310) 446-9978 (fax)
3. The nature of the copyrighted works whose secondary transmissions provide the basis of the claim is: TELEVISION PROGRAMS AND/OR WORKS INCLUDED IN SUCH PROGRAMMING OR TRANSMISSION
4. On the basis of information and belief, our copyrighted programs (i) "Young America Outdoors", (ii) "Pokemon", (iii) "Creslo A. Dollar", (iv) "All News Channel" were the subject of primary transmissions by television stations (i) WGN, Chicago, (ii) KTLA, Los Angeles, (iii) KTLA, Los Angeles, (iv) KMOV, St. Louis on (i) May 13, 2000, (ii) July 24, 2000, (iii) July 16, 2000, (iv) June 10, 2000, and were retransmitted on a distant signal basis on those dates by cable systems known as (i) Allen's Cable TV Service Inc., (ii) NPG Cable Inc., (iii) NPG Cable Inc., (iv) Fidelity Cable which serve (i) Morgan City, LA, (ii) Mammoth Lakes, CA, (iii) Mammoth Lakes, CA, (iv) Rolla, MO. The claimants of the foregoing programs are (i) Grandolph Juravic Entertainment, LLC, (ii) Shogakukan Production Company, Ltd., (iii) Creslo A. Dollar Ministries, and (iv) Conus Communications.

If there are any questions concerning this claim, please contact the undersigned. All correspondence should be sent to Worldwide Subsidy Group, 9903 Santa Monica Blvd., #655, Beverly Hills, California 90212. (310) 446-1768 (phone), (310) 446-9978 (fax).

Artist Collections Group LLC d/b/a Worldwide Subsidy Group

9903 Santa Monica Blvd., #655

Beverly Hills, California 90212

By (signature): 

Typed/Printed Name: Marian Oshita

Title: Vice-President

Date: July 31, 2001

Artist Collections Group d/b/a Worldwide Subsidiary Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
1st Miracle Pictures	3439 West Cahuenga Blvd.	Hollywood, CA 90068	Simon Bibayan	323-874-6000	323-874-4252
3DD Entertainment	190 Camden High Street	London NW1 8QP	Julie King	44-207-428-1800	44-207-428-1818
A&E Television Network	235 E. 45th	New York, NY 10017	Phyllis Lares	212-210-1370	212-210-1308
Abrams Gentile Entertainment	244 W. 54th St., 9th Floor	New York, NY 10019	John Gentile	212-757-0700	212-765-1987
Academy of Television Arts and Sciences	5220 Lankershim Blvd.	North Hollywood, CA	Herb Jellinek	818-754-2800	818-769-9034
Advantage Media Group	4298 Bright Bay Way	Ellicott City, MD 21042	Michael P. DuMonceau	410-465-0532	410-992-8063
Alain Sirinsky Productions	[see South Hope Street Productions]				
American Film Institute (AFI)	2021 North Western Ave	Los Angeles, CA 90027	Bruce Neiner	323-856-7725	323-462-7683
American Film Investment Corporation dba Golden Films	2400 Sand Hill Road, Ste. 201	Menlo Park, CA 94025	Diane Eskinazi	650-854-5777	650-854-1578
Anheuser-Busch Companies, Inc	One Busch Place	St. Louis, MO 63118	Debbie Norman	314-577-7088	314-577-3835
Ardent Productions	The Old Stables, Bagshot Park	Bagshot, Surrey GU19 5PJ	Malcolm Eldridge	44-1276-700-800	44-1276-700-801
Artist Collections Group LLC dba Worldwide Subsidiary Group	9903 Santa Monica Blvd., #655	Beverly Hills, CA 90212	Raul Galaz	210-490-1418	210-490-9779
AVA Productions B.V.	J. Muyskenweg, 22	NL-1096 CJ Amsterdam	Willy Lindwer	31-20-568-9999	31-20-568-9995
Aviva International LLC	850 Old Country Road, 2nd Floor	Belmont, CA 94002	Michael Lopez	650-631-3601	650-631-3616
BBC Worldwide	747 3rd Avenue, 6th Floor	New York, NY 10017	Matthew Miller	212-705-9300	212-888-0576
BBL Distribution	7800 Beverly Blvd., Ste. 337	Los Angeles, CA 90212	Ron Weaver	323-575-4504	323-575-3820
Beacon Communications Corp.	1041 N. Fomosa Ave., Santa Monica Bldg., Ste. 207	Los Angeles, CA 90046	Tom Bliss	310-260-7000	310-260-7050
Beil-Phillip Television Productions, Inc.	7800 Beverly Blvd., Ste. 337	Los Angeles, CA 90212	Ron Weaver	323-575-4504	323-575-3820

Artist Collections Group d/b/a Worldwide Subsidiary Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
Benny Hinn Ministries	P. O. Box 16847	Irving, TX 75016	Carolyn Robinson	972-629-2222	972-677-1239
Beyond International Ltd	53-55 Brisbane Street	Surrey Hills NSW 2010, Australia	Fiona Crago	61-2-9281-1266	61-2-9281-1261
Big Events Company	CSI House, 177-187 Arthur Road	London SW198AE UK	Alex Fraiser	44-20-8946-0056	44-20-8944-5710
BKS Entertainment	250 West 54th St., Ste. 807	New York, NY 10019	Robert Silberberg	212-765-5555	212-765-5840
C/F International, Inc.	Box 4, 2550 Willow Lane	Thousand Oaks, CA 91361	Scott Bolton	805-446-6505	805-446-6501
Cappy Productions	118 East 57th Street	New York, NY 10022	Nancy Baffa	212-249-1800	212-439-9165
Cascade	Cowcaddens	Glasgow G2 3PR	Adrian Howells	44-141-300-3000	44-141-300-3256
Cascade Films Pty Ltd	c/o Roth Warren, Solicitors, Level 5, 121 Flinders Lane	Melbourne VIC 3000, Australia	Boyce Menzies	61-3-9650-5888	61-3-9650-9440
Central City Productions	223 W. Ene, Ste. 7NW	Chicago, IL 60610	Jennifer Jackson	312-664-5900	312-664-5894
Chesler/Perlmutter Productions	129 Yorkville Ave., Suite 200	Toronto, Ont. M5R 1C4	David Perlmutter	416-927-0016	416-960-8447
Choon Intellectual Properties Ltd.	Vernon House, 40 Shaftesbury Avenue	London, W1V70D, U.K.	Jeremy Banks	44-207-434-1880	44-207-434-1882
CLT-Ufa S.A.	45 Boulevard Pierre Frieden	L-1543 Luxembourg	George Meintz	352-421-423-945	352-421-423-998
Community Television Foundation of South Florida, Inc.	14901 NE 20th Avenue	Miami, FL 33181	Linda O'Bryon	305-949-8321	305-949-9772
Conus Communications	3415 University Avenue	St. Paul/Minneapolis, MN 55414	Terry O'Reilly	651-642-4645	651-642-4680
Corday Productions	c/o Goldman & Kagan, 1801 Century Park East, #2222	Los Angeles, CA 90067	Barry Felsen, Esq.	310-552-1707	310-552-7938
Cosgrove-Meurer Productions	4303 W. Verdugo	Burbank, CA 91505	John Cosgrove	818-843-5600	818-843-8585
Creative Children's Group Ltd.	[see Litton Syndications]				
Creflo A. Dollar Ministries	c/o Brewer, et al., 1159 Cottonwood Lane, Ste. 150	Irving, TX 75038	David Joe, Esq	972-870-9898	972-870-9053

Artist Collections Group d/b/a Worldwide Subsidiy Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
Cromwell Productions	Suite 11, Central Chambers, Cooks Alley 397 Bay Shore Avenue	Stratford-Upon-Avon, CV37 6QN	Steve Gillham	44-1789-415-210	44-1789-415210
Daniel Hernandez Productions		Long Beach, CA 90803	Daniel Hernandez	562-439-6901	562-856-8941
David Finch Distribution Ltd fka David Finch Associates	P O. Box 264, Walton-on- Thames	Surrey KT12 3YR England	David Finch	44-1932-882733	44-1932-882108
Decode Entertainment, Inc.	512 King Street East, Ste 104	Toronto, Ontario Canada M5A 1M1	Neil Court	416-363-8034	416-363-8919
Distraction Formats	35, rue Washington	75008 Paris FRANCE	Grant Ross	33-142-89-1450	33-142-89-1840
DreamWorks SKG	100 Universal Plaza, Bldg. 10	Universal City, CA 91608	Julie Jenkins	818-733-6803	818-733-6377
Eagle Mountain Int'l Church (Kenneth Copeland Ministries)	c/o Brewer, 1159 Coltonwood Lane, Ste. 150	Irving, TX 75038	David Joe. Esq.	972-870-9898	972-870-9053
Eagle Rock Entertainment	22 Armoury Way	Wandsworth, London U.K. SW18 1EZ	Geoff Kempin	44-208-870-5670	44-208-874-2333
EM.TV & Merchandising AG	Betastrasse 11,	D-85774 Unterföhring, Germany	Dr. Mathias Schultze	49-89-99-500-625	49-89-99-500-616
Enoki Films USA, Inc.	16501 Ventura Blvd. Ste 606	Encino, CA 91436	Ricki Ames	818-907-6503	818-907-6506
Entertainment Rights PLC fka SKD Media (Sleepy Kid Co.)	31 St Petersburgh Place	London W2 4LA	Rob Dargue	44-20-7243-4499	44-20-7243-4778
ESPN	605 Third Ave., 11th Floor	NY, NY 10158-0180	Ben Nichols	212-916-9200	212-916-9325
Fédération Internationale de Football Association	FIFA House, 11 Hitzigug, 8030	Zurich, Switzerland	Roger Finer	41-1-384-9595	41-1-384-9696
Filmline International 1999 Inc.	410 St-Nicolas Street, Suite 10	Montreal Qc Canada H2Y 2P5	Renee Hebert	514-288-5888	514-288-8083
Films By Jove	11325 Sunshine Terrace	Studio City, CA 91604	Joan Borsten	818-506-2490	818-752-0387
Fintage House Publishing and Collection	Schipholweg 79	2316 ZL Leiden, Netherlands	Ernst Bakker	31-71-565-9996	31-71-565-9990
Five Star Productions aka 5 Star Productions	430 S. Congress Avenue	DeLray Beach, FL 33445	Steve Lampel	561-279-7827	561-279-4808
Flesh and Blood Inc.	14 Duncan St., Suite 203	Toronto Ontario M5H 3G8 Canada	Helen Asimakis	416-586-9991	416-586-9992

Artist Collections Group d/b/a Worldwide Subsidiary Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
Flying Tomato Films	11755 Victory Blvd., Ste. 103 91606	North Hollywood, CA	Tony Nassour	818-752-1939	818-752-2161
France Animation	14, Rue Alexander Parodi Box 599	75010 Paris	Katherine Lebaillly	33-1-53-35-90-92	33-1-53-35-9091
Freewheelin' Films, Ltd.	6851 N.E. Loop 820, Ste. 247	Aspen, CO 81612	Rodney Jacobs	970-925-2640	970-925-9369
Funimation	c/o Serfing Rooks & Fenara LLP	Fl. Worth, TX 76180	Daniel Cocanougher	817-788-0627	817-788-0628
Gabriel Communications	2400 Sand Hill Road, Ste. 201	254 West 54th, 14th Floor	Wayne Rooks, Esq.	212-245-7300	212-586-5175
Golden Films Finance Corporation dba Golden Films	[see Magus]	Menlo Park, CA 94025	Diane Eskanazi	650-854-5777	650-854-1578
Gorky Studios					
Grandoiph Juravic Entertainment, LLC	R F D. 1680 Bordeaux Amperestraal 10	Long Grove, IL 60047	Gary Grandolph	847-537-4007	847-537-4222
Greenlight International B.V.	[see Televisa, S.A. de C.V.]	1221 GJ Hilversum, The Netherlands	Rick van den Heuvel	31-35-642-0677	31-35-642-0668
Grupo Televisa, S.A.					
GTSP Records	c/o Steve Callas Assoc., 12424 Wilshire Blvd., Ste. 1150	Los Angeles, CA 90025	Steve Callas	310-826-1164	310-826-7986
Holden Productions	3800 Commerce St., #209	Dallas, TX 75226	Mickey Holden	214-370-3957	214-370-3957
Home Enterprises	3411 Silverside Road	Wilmington, DE 19810	Bob Nightengale	800-572-5260	302-479-7977
Human Voices Ply Ltd.	Level 1, 111 Nott Street	Pori Melbourne VIC 3207, Australia	David Redman	61-3-9645-4811	61-3-9646-1588
Image Entertainment, Inc.	9933 Oso Avenue	Chatsworth, CA 91311	Shannon Van Dom	818-407-9100	818-407-9331
Integrity Global Marketing	4735 Belpar St. N.W.	Canton, OH 44718	Kristan Markopoulos	303-479-2891	303-479-2893
Jay Ward Productions	8200 Sunset Blvd.	Los Angeles, CA 90046	Tiffany Ward	323-650-2941	323-650-2940
JCS Entertainment II	4676 Admiralty Way, Ste. 300 90292	Marina Del Rey, CA	J.C Shardo	310-448-2977	310-821-0073

Artist Collections Group d/b/a Worldwide Subsidy Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
Kid Friendly Productions	2550 Cattleman Way	Paso Robles, CA 93446	Jeff Hoops	805-227-0590	805-227-0591
Knight Scenes Incorporated	1333 H St. NW, West Tower, 10th Floor	Washington, D.C. 20005	Graham Knight	202-289-2201	202-289-2765
Lacey Entertainment	1414 Avenue of the Americas, 3rd Floor	New York, NY 10019	Brian Lacey	212-754-5482	212-754-5481
LaFonda Partners	4401 Albert Circle	Lake Oswego, OR 97035	Julie Lafond	503-639-8780	503-639-9281
Libra Films	[see Magus Entertainment]				
Lifetime Television	309 W. 49th St.	New York, NY 10019	Lucy Burkes	212-424-7166	212-957-4447
Link Television Entertainment	10339 Whipple Street	Toluca Lake, CA 91602	Jo Kavanagh- Payne	818-508-9300	818-508-0800
Lipscomb Entertainment	P.O. Box 291598	Los Angeles, CA 90029	Steve Lipscomb	323-953-8842	323-860-8615
Litton Syndications	2213 Middle St., 2nd Floor	Sullivan's Island, SC 29482	Pete Smideman	843-883-5060	843-883-9957
Magus Entertainment	Imperestraat 10, 1221 GJ Hilversum	The Netherlands	Rick van den Heuvel	31-35-642-0677	31-35-642-0668
Mainframe Entertainment	710-1045 Howe St.	Vancouver, BC Canada V6Z 2A9	Heleen Chapman	604-714-2600	604-714-2641
Mark Anthony Entertainment	1375 Broadway, 21st Floor	New York, NY 10018	Tony Instellano	212-271-2359	212-937-0406
Mega Entertainment International	150 West 25th Street, # 503	New York, NY 10001	Mor Sommer	212-242-0088	212-242-0808
Minotaur International Ltd.	160 Great Portland St.	London W1N 5TB	Nigel Gibbons	44-20-7299-5000	44-20-7299-5777
Morm U.S.A. Inc.	[see Litton Syndications]				
Muggers Films	First Floor, 111 Noit Street	Port Melbourne VIC 3207, Australia			
Music & Media International	8756 Holloway Dr.	West Hollywood, CA 90069	Billy Meshel	310-360-7777	310-360-7778
Mynard Pictures	421 South Beverly Drive, 5th Floor	Beverly Hills, CA 90212, USA	Kaytie Dinh	310-789-4500	310-789-4545

Artist Collections Group d/b/a Worldwide Subsidy Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
Nabisco, Inc.	c/o Cokin Communications, 75 Washington Blvd.	Stamford, CT 06901	Jeff Cokin	203-977-0550	203-977-0555
National Academy of Television Arts and Sciences	111 W. 57th Street	New York, NY 10019	John Cannon	212-586-8424	212-246-8129
New Dominion Pictures LLC	1000 Film Way	Suffolk, VA 23434	Krislen Eppley	757-923-1300	757-923-1340
New Visions Syndication, Inc.	P.O. Box 599	Aspen, CO 81611	Rodney Jacobs	970-925-2640	970-952-9369
NuHart Hair Clinics, Inc.	Seven Parkway Center, 875 Greenlree Road, Ste. 240	Pittsburg, PA 15220	Micaela Mendez	412-928-4607	412-928-4620
NuHart Hair Solutions, Inc.	1414 Avenue of the Americas, Ste. 403	New York, NY 10019	Micaela Mendez	212-917-9260	212-371-6124
NVC Arts	The Forum, 74-80 Camden St.	London NW1 0EG, UK	Seamus Keys	44-20-7386-3833	44-20-7383-7174
O. Alias Enterprise, Inc. aka Alias Enterprises	8383 Washire Blvd., Ste. 339	Los Angeles, CA 90211	Barbara Alias	323-782-3525	323-782-3530
Over the Edge-TV	401 Morris Avenue, Studio 1	Springfield, NJ 07081	Harry O	973-379-6805	973-379-6807
Passport International Productions	10520 Magnolia Blvd.	North Hollywood, CA 91601	Eilore Bolla	818-760-1500	818-760-1532
Planet Pictures	4764 Park Granada, Suite 208	Calabasas, CA 91302	Jenny Hayden	818-222-9000	818-222-4370
Promark Television Inc.	323 S Doheny Dr., #301	Los Angeles, CA 90048	David Levine	310-276-3020	310-276-3840
Quartet International	20 Bultermut Dr.	Pearl River, NY 10965	Harvey Cherlok	914-735-8700	914-735-8999
Raycorn Sports	2315 Coliseum Center Drive, Ste. 200	Charlotte, NC 28217	Collin Smith	704-378-4487	704-378-4461
Reel Media International	4516 Lovers Lane, Suite 178	Dallas, TX 75225	Tom T. Moore	214-521-3301	214-522-3448
Richard Gabai	c/o Check Entertainment, 5633 Noble Avenue	Van Nuys, CA 91411, U.S.A.	Jessica Gabai	818-997-9669	818-997-9668
Sandra Carter Productions	230 W. 79th St., #102	New York, NY 10024	Sandia Carter	212-246-4765	212-246-4953
Sarrazin Couture Entertainment	14 Duncan St., Suite 203	Toronto Ontario M5H 3G8 Canada	Helen Asimakis	416-586-9991	416-586-9992

Artist Collections Group d/b/a Worldwide Subsidy Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
Scholastic Productions, Inc	524 Broadway, 5th Floor	New York, NY	Andrea Sporer	212-343-7547	212-343-6100
Scott Free Productions	9346 Civic Center Dr., Mezz Flr.	Beverly Hills, CA 90210	Edith Myers	310-360-2250	310-888-4111
Shogakukan Production Co. Ltd.	Shinko-Building, Shinkan, 2-12 Kanda Ogawamachi	Chiyoda-ku, Tokyo 101- 8415, Japan	Akiko Kolake, AK Company Ltd.	81-3-3404-7671	81-3-3404-7274
Showtime Television	10880 Wilshire Blvd., Suite 1600	Los Angeles, CA 90024	Gay Hango	310-234-5200	310-234-5399
Sky Visual	133 Dowling Street	Woolloomooloo NSW 2011, Australia	Tina Dalton- Hagege	61-2-9331-0877	61-2-9357-4126
South Hope Street Music (aka Click Productions)	6399 Wilshire Boulevard, Ste 1007	Los Angeles, California 90048	Kelly Cutts	323-655-6845	323-655-6849
Sportsworld	6 Henrietta Street, Covent Garden	London WC2E 8PS UK	Richard Kaye	44-207-240-9626	44-207-240-9636
St. Jude Children's Hospital	501 St. Jude's Place	Memphis, TN 38105	Dutch Van Duzee	901-524-0306	901-523-6610
Storm Entertainment Inc.	225 Santa Monica Boulevard, Suite 601	Santa Monica, CA 90401	Susan K Nickels	310-656-2500	310-656-2510
Streamline Pictures	8624 Wilshire Blvd.	Beverly Hills, CA 90211	Carl Macek	310-659-7690	310-273-6076
Taurus 7 Film Corp.	600 Peel, Suite 245	Montreal, Quebec H3C 2H1, Canada	Stephanie Michaud	514-939-6331	514-939-6331
Team Communications Group aka Team Entertainment Group	11818 Wilshire Blvd., 2nd Floor	Los Angeles, CA 90025	Eric Elias	310-442-3500	310-442-3501
TearDrop Golf	8350 N. Le High	Morton Grove, IL 60053	Joe Cioni	847-966-6300	847-966-1355
Televisine, S.A. de C.V.	Ave. Vasco de Quiroga No 2000, Edif. "A"	Col. Zedec Santa Fe, 01210, Mexico City	Patricio Velarde	786-265-4840	786-265-2267
Televisa Internacional, S.A.	6355 Northwest 36th Street	Miami, Florida 33166	Patricio Velarde	786-265-4840	786-265-2267
Televisa, S.A. de C.V.	Ave Vasco de Quiroga No. 2000, Edif. "A"	Col. Zedec Santa Fe, 01210, Mexico City	Patricio Velarde	786-265-4840	786-265-2267
Tepuy International	2745 Ponce de Leon Blvd.	Coral Gables, FL 33134	Ignacio Barrera	305-774-0033	305-774-0331
TF1 International/City D.A.	305 Avenue Le Jour Se Leve	9265 Boulogne, Cedex, France	Daniel Preljocaj	33-1-41-41-2209	33-1-41-41-4234

Artist Collections Group d/b/a Worldwide Subsidiy Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
The City Productions Inc.	14 Duncan St., Suite 203	Toronto Ontario M5H 3G8 Canada	Helen Asimakis	416-586-9991	416-586-9992
Thomas Horton Associates	408 Bryant Circle, Suite K	Ojai, CA 93023	Jean Horton Game	805-646-7866	805-646-3600
Tide Entertainment:	1120 Gator Trail	Palm Beach, FL 33409	Jason Ealon	800-793-3945	561-683-0444
Timberwolf Productions	8051 State Highway 34	Marble Hill, MO 63764	Buck McNeely	573-204-1900	573-204-1999
Today's Homeowner	1480 Cody Road South	Mobile, AL 36695	Danny Lipford	334-633-4420	334-633-2043
Tremendous Entertainment	17113 Minnetoka Blvd	Minnetonka, MN 55345	Germaine Deagan	952-258-0220	952-258-0155
TV Guide	2121 Ave of Americas, 4th Floor	New York, NY 10036	Alex Tarter	610-293-8907	610-293-6200
TV Matters	De Ruyterkade 142	1011 AC Amsterdam, Netherlands	J W. Bosman Jansen	31-20-627-2126	31-20-620-7939
TVD Productions	38 Fernwood	Montgomery, IL 60538	Tim Hay	630-896-2850	630-717-7574
TV-Loonland AG	Münchener Str. 16, 85774 Unterföhring	München, Germany	Konstantin Von Reden-Lütken	49-89-205-08-117	49-89-205-08-199
The Television Syndication Company, Inc.	501 Sabal Lake Drive, Ste. 105	Longwood, FL 32779	Cassie Yde	407-788-6407	407-788-4397
United Negro College Fund	8260 Willow Oaks Corporate Drive	Fairfax, VA 22031	Sydney Aveni	703-205-3442	703-205-3578
United States Olympic Committee	One Olympic Plaza	Colorado, Springs, CO 80909	Greg Downey	719-578-4971	719-575-4020
Video Tours Inc.	15 New Britain Avenue	Unionville, CT 06085	Susanne LaFrance	860-675-0828	850-675-9716
Videocine, S.A. de C.V.	Ave. Vasco de Quiroga No. 2000, Edif. "A"	Col. Zedec Santa Fe, 01210, Mexico City	Patricio Velarde	786-265-4840	786-265-2267
Vivavision Inc. Ika Productions JBM Inc.	1873 Falardeau	Montreal (Quebec) H2K 2L9 Canada	Jean-Patrick Lebeux	514-527-9000	514-527-9625
Wai Lana Yoga	P.O. Box 6146	Malibu, CA 90264	Sunil Khermaney	805-986-3557	805-986-5447
Watercourse Road Productions LLC	100 N. Hope Ave., Ste 18	Santa Barbara, CA 93110	Tom Moyer	805-962-6688	805-962-8423

Artist Collections Group d/b/a Worldwide Subsidiy Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
Wave Entertainment	26 Punch Street	Arlarmon, NSW 2064, Australia	Matthew Gee	61-2-9966-8839	61-2-9966-8841
West 175 Enterprises, Inc.	2203 Airport Way Street, Ste. 801	Seattle, WA 98134	Maria Poland	206-233-0750	206-233-0753
Wild Heart Productions	133 Dowling Street	Woolloomooloo NSW 2011, Australia	Tina Dalton-Hagege	61-2-9331-0877	61-2-9357-4126
Wild Visuals	133 Dowling Street	Woolloomooloo NSW 2011, Australia	Tina Dalton-Hagege	61-2-9331-0877	61-2-9357-4126
Winchester Entertainment PLC	29/30 Kingly Street	London W1R 5LB	Chns Craib	44-207 851 6500	44-207 851 6505
Worldwide Pants, Inc.	1697 Broadway	New York, NY 10019	Amy Rubin	212-975-5545	212-975-6225
Yoram Gross	62-68 Church Street	Camperdown NSW 2050, Australia	Kelly O'Meara	61-2-9519-1366	61-2-9519-1258

# **EXHIBIT 56**

CABLE CLAIM -- COPYRIGHT ARBITRATION ROYALTY PANEL

Worldwide Subsidy Group, a Texas limited liability company, d/b/a Independent Producers Group, does hereby file, on behalf of itself and all other parties listed on the attached Exhibit A, a claim to compulsory license fees pursuant to 17 U.S.C. Section 111(d)(4)(A) and 37 C.F.R. Section 252.3 for secondary transmissions by cable systems during the period January 1, 2000 through December 31, 2000. All parties in whose names the claim herein is filed have duly authorized the above party to make this filing on their behalf. In compliance with 37 C.F.R. Section 252.3, said claimant hereby furnishes the following information:

1. The full legal name of the persons or entities claiming compulsory license fees is:  
See attached Exhibit A.
2. The full address of the place of the claimants place of business, including phone/fax number is:  
19275 Stone Oak Parkway, #711, San Antonio, Texas 78258, (210) 490-9887  
(phone), (210) 490-9779 (fax)
3. The nature of the copyrighted works whose secondary transmissions provide the basis of the claim is: TELEVISION PROGRAMS AND/OR WORKS INCLUDED IN SUCH PROGRAMMING OR TRANSMISSION
4. On the basis of information and belief, our copyrighted programs (i) "Singsation", (ii) "Fishing University", (iii) "Bloomberg Money", (iv) "Home Again with Bob Vila" were the subject of primary transmissions by television stations (i) WGN, Chicago, (ii) WGN, Chicago, (iii) KRON, San Francisco, (iv) WBZ, Boston on (i) June 18, 2000, (ii) February 5, 2000, (iii) April 7, 2000, (iv) July 23, 2000, and were retransmitted on a distant signal basis on those dates by cable systems known as (i) Allen's Cable TV Service Inc., (ii) Allen's Cable TV Service Inc., (iii) Charter Communications L.P., (iv) Frontier Vision Operating LP which serves (i) Morgan City, LA, (ii) Morgan City, LA, (iii) Gilroy, CA, (iv) Lincoln, NH. The claimants of the foregoing programs are (i) Willie Wilson Productions, Inc., (ii) Fishing University LLC, (iii) Bloomberg L.P./Bloomberg Television, and (iv) BTVV, Inc.

If there are any questions concerning this claim, please contact the undersigned. All correspondence should be sent to Independent Producers Group, 19275 Stone Oak Parkway, #711, San Antonio, Texas 78258, (210) 490-9887 (phone), (210) 490-9779 (fax)

Worldwide Subsidy Group LLC d/b/a Independent Producers Group  
19275 Stone Oak Parkway, #711  
San Antonio, Texas 78258

By (signature): [Signature]  
Typed/Printed Name: Marian Oshita  
Title: Vice-President

Date: July 31, 2001

Worldwide Subsidiary Group d/b/a Independent Producers Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
Adler Media Inc.	6849 Old Dominion Dr., Ste. 380	McLean, VA 22101	Larry Adler	703-556-8880	703-556-9289
America's Black Forum, Inc.	1710 Connecticut Ave. NW	Washington, D.C. 20009	Byron Lewis	202-833-3915	202-833-9065
Amity Film & Video Productions Ltd.	30 High Street, First Floor	Godalming, Surrey GU7 1DZ, U.K.	Colin Wood	44-148-352-7277	44-148-342-1491
Atlantic Film Corporation	Celtic House, Amberly Place	Windsor, Berks SL4 1TN	Jamie Doran	44-1753-842-222	44-1753-842-244
Atlantic Film Partners, c/o Wigmore Co.	88 Baker Street	London W1U 6TQ, U.K.	Keith Evans	44-207-487-3677	44-207-487-5567
Beckmann International	Meadow Court, West Street	Ramsey, Isle of Man. IM8 1AE British Isles	Michael Souter	44-1624-816-585	44-1624-816-589
Bloomberg L.P./Bloomberg Television	499 Park Avenue	New York, NY 10022	Karl Kilb	212-318-2371	212-893-5371
BVTV, Inc.	20 Rascally Rabbit Road	Marlston Mills, MA 02648	Robert J. Vila	508-428-3171	508-428-3179
C21C Limited	55 Loundoun Road	London NW80DL, U.K.	Angus Margenson	44-208-955-2559	44-208-956-2574
Canamedia Productions Ltd.	1670 Bayview Ave., Ste 408	Toronto, ON, Canada M4G 3C2	Les Harris	416-483-7446	416-483-7529
Candid Camera, Inc.	650 Lighthouse Avenue	Pacific Grove, CA 93950	L.G. Konya	831-625-3788	831-625-3835
Central City Holdings	[see Central City Productions, Inc.]				
Central City Productions, Inc.	223 W. Erie, Ste. 7NW	Chicago, IL 60610	Rosemary Jackson	312-664-5900	312-664-5894
Children's Medical Foundation	2777 Stemmons Freeway, #1025	Dallas, TX 75207	Betsy Field Mackey	214-456-5303	214-456-5301
CineGroupe Images Inc.	1151, Alexandre-DeSeve Sireel	Montreal, Quebec H2L 2T7	Elaine Bigras	514-849-8925	514-849-9846
Computer Personalities Systems, Inc.	c/o Oberman, Rebmann, 1617 JFK Blvd.	Philadelphia, PA 19103	Lawrence Lichtenstein, Trustee	215-665-3000	215-665-3165
Coral Pictures Corporation	4380 NW 128th Sireel	Miami, FL 33139	Maricarmen Tredunio	305-688-7475	305-688-2379
Direct 2U, Inc.	c/o Oberman, Rebmann, 1617 JFK Blvd.	Philadelphia, PA 19103	Lawrence Lichtenstein, Trustee	215-665-3000	215-665-3165

Worldwide Subsidiy Group d/b/a Independent Producers Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
Direct Cinema, Ltd.	P.O. Box 10003	Sanla Monica, CA 90410	Mitchell Block	310-636-8200	310-636-8228
Equestrian Vision	Horsham Road	Horsham, West Sussex RH13 8BP U.K.	Jamie Hawkesfield	44-1403-864-173	44-1403-865-321
Farm Journal Electronic Media Company	25 Executive Drive, Ste A	Lafayette, IN 47905	Nathan Van Der Male	765-449-8000	765-449-8010
Feed the Children, Inc.	P.O. Box 36	Oklahoma City, OK 73101	Lam Sue Jones	405-942-0228	405-945-4024
Fishing University, LLC	290 Leatherwood Drive	Winchester, TN 37398	Bill Balsley	931-962-9000	931-962-9064
Glittering Clowns Electronic Publ. Co. Ltd.	Estate Office, Exbury	Southampton SO45 1AZ, U.K.	Nick De Rothschild	44-2380-891-203	44-2380-243-380
Global Response LLC	708 South Third St., #108	Minneapolis, MN 85415	Steven Hoyt	612-338-7787	612-338-7797
Granada Media International	London Television Ctr., Upper Ground	London, SE1 9LT U K	Talia Griffith	44-207-491-1441	44-207-389-8745
GRB Entertainment	13400 Riverside Drive	Sherman Oaks, CA 91423	George Telagadis	818-728-7600	818-728-7601
Hawthorne Direct	300 N. 16th Street	Fairfield, Iowa 52556	Bob Moore	641-472-3800	641-472-4553
HLB Productions	1057 31st Street South	Birmingham, AL 35205	Jennifer Jones	205-939-3614	205-933-5288
Inca	67 Castlelnau, Barnes	London SW13 9RT U.K.	William Woollard	44-208-748-9600	44-208-748-9607
Jefferson Pilot Sports	One Julian Price Place	Charlotte, NC 28208	Roger Roebuck	704-374-3826	704-374-3859
K2 Media Group	5 Park Plaza	Irvine, CA 92614	Dr. Robert Kuhn	949-756-2200	949-622-7800
Life Outreach International	1801 W. Euless Blvd	Euless, TX 76040	Joyce Gardiner	817-267-4211	817-685-1972
Mampre Media International	5123 Del Monte Dr., Ste. 7	Houston, TX 77056	Virginia Mampre	713-960-9849	713-960-8811
Mark Anthony Entertainment	1375 Broadway, 21st Floor	New York, NY 10018	Tony Insteliano	212-271-2359	212-937-0406
Martha Stewart Living Omnimedia, Inc.	20 West 43rd St., 25th Floor	New York, NY 10036	Greg Blatt	212-827-8000	212-827-8289

Worldwide Subsidy Group d/b/a Independent Producers Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
Marty Stouffer Productions Ltd.	P.O. Box 5057	Aspen, CO 81612	Mary Ridings	970-925-5536	970-925-3820
MBC Teleproductions	300 E. Rock Road	Allentown, PA 18103	Bob Croesus	610-791-5880	610-791-6922
Mentom Barraclough Carey Productions Ltd.	[see Mentom Int'l Distr. Ltd.]				
Mentom International Distribution Ltd.	43 Whitfield Street	London W1T 4HA, U.K.	David Leach	44-207-258-6832	44-207-258-6889
Meredith Corporation	1716 Locust Street	Des Moines, IA 50309	Douglas Lowe	515-284-2166	515-284-3933
Midwest Center for Stress & Anxiety, Inc.	106 N. Church St., #200	Oak Harbor, OH 43449	David B. Bassett	310-589-3180	310-589-3183
Multimedia Group of Canada	261 du St-Sacrement St.	Montreal, Quebec, Canada H2Y 3V2	Sani Buksner	514-844-3635	514-844-4990
Mustang Marketing, Inc.	4630 Campus Dr., Ste. 300C	Newport Beach, CA	Mark Colosi	800-208-6119	716-436-4770
Network Programs International	3150 Ocana Avenue	Long Beach, CA 90808	Richard Shaw	562-421-1672	562-421-1482
NTS Program Sales	111 N. Country Road	Port Jefferson, NY 11777	Theodore George	516-696-2401	516-696-5310
Pacific Family Entertainment LLC	642 South B St., Ste. A	Tustin, CA 92780	Tim Cook	714-669-4900	714-669-4905
Paul Feldman	133 Whitehouse Ave., Boreham Wood	Herts WD6 1HB, U.K.	Paul Feldman	44-208-953-9929	44-208-953-0802
Peter Rodgers Organization	1800 N. Highland Ave., Ste. 100	Hollywood, CA 90028	Jennifer Grimm	323-962-1778	323-962-7174
Phil Slater Associates	32 Ash Street	Fleetwood, Lancashire, U.K.	Phil Slater	44-1253-770-510	44-1253-776-729
PMT, Ltd.	785 Cressman Rd.	Harleysville, PA 19438	Mark H. Tuttle	610-584-5370	610-584-6796
Questar Video	680 North Lake Shore Dr., #900	Chicago, IL 60611	Bob Norris	312-266-9400	312-266-9400
Ron Hazelton Productions, Inc.	161 West 61st, Ste. 22F	New York, NY 10023	William Maguire	908-232-2399	908-232-2375
Sophistry Limited	3 Quayside Street	Edinburgh EH6 6EJ, U.K.	Ken Maliphant	44-7831-364-075	

Worldwide Subsidiary Group d/b/a Independent Producers Group

Exhibit A

Claimant	Address	City, State, Country	Contact Person	Telephone	Fax
SL Jude Children's Research Hospital	501 St. Jude's Place	Memphis, TN 38105	Aggie Alexander	901-524-0305	901-523-6610
Stinson & Stilson	1192 E. Draper Parkway, #404	Draper, UT 84020	Andy Naud	801-566-1616	801-816-1393
Tapestry International Ltd.	11 Hanover Square, 14th Floor	New York, NY 10005	David McNulty	212-505-2288	212-505-5059
TF1 International	1 quai du Point du Jour	92656 Boulogne, Cedex, France	Jean Louis Capra	33-41-41-2854	33-41-41-4232
TV Matters	De Ruyterkade 142	1011 AC Amsterdam, Netherlands	J.W. Bosman Jansen	31-20-627-2126	31-20-620-7939
Twin Cities Public TV	172 East Fourth Street	St. Paul, MN 55101	Michael Watkins	651-229-1375	651-229-1570
Unapix Entertainment, Inc.	15910 Ventura Blvd., 9th Floor	Encino, CA 91436	Cheryl Freeman	818-784-3337	818-784-0461
Uniworl'd Group	100 Sixth Avenue	New York, New York 10013	Gerry Canlas	212-219-7224	212-219-1939
Video Professor, Inc.	1310 Wadsworth Blvd.	Lakewood, CO 80215	Bettye Harrison	303-232-1244	303-232-7211
Video/Media Distribution Inc.	1050 North State Street	Chicago, IL 60610	Sheldon H. Beugen	312-944-4700	312-944-1582
Whamo Entertainment	1850 South Sepulveda Blvd., #201	Los Angeles, CA 90025	Joseph Szew	310-477-0338	310-477-8116
Willie Wilson Productions, Inc.	P.O. Box 129	Mallerton, IL 60443	Willie L. Wilson	800-872-6712	708-283-8106
World Events Productions	1 S. Memorial Drive, Ste. 2000	St. Louis, MO 63102	William J. Alverson	314-345-1025	314-345-1090
World Events Productions Ltd.	[see World Events Productions]		Dan Neumann		

# **EXHIBIT 57**

CABLE CLAIM - - COPYRIGHT ARBITRATION ROYALTY PANEL

0101517

Artist Collections Group, a California limited liability company, dba Worldwide Subsidy Group does hereby file, on behalf of itself and all other parties listed on the attached Exhibit A, a claim to compulsory license fees pursuant to 17 U.S.C. Section 111(d)(4)(A) and 37 C.F.R. Section 252.3 for secondary transmissions by cable systems during the period January 1, 2001 through December 31, 2001. All parties in whose names the claim herein is filed have duly authorized the above party to make this filing on their behalf. In compliance with 37 C.F.R. Section 252.3, said claimant hereby furnishes the following information:

1. The full legal name of the persons or entities claiming compulsory license fees is:  
See attached Exhibit A.

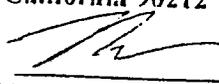
2. The full address of the place of the claimants place of business, including phone/fax number is: 9903 Santa Monica Blvd., #655, Beverly Hills, California 90212, (310) 446-1768 (phone), (310) 446-9978 (fax)

3. The nature of the copyrighted works whose secondary transmissions provide the basis of the claim is:  
TELEVISION PROGRAMS AND/OR WORKS INCLUDED IN SUCH PROGRAMMING OR TRANSMISSION

4. On the basis of information and belief, our copyrighted programs (i) "Animal Adventures", (ii) "Critter Gitters", (iii) "Game Warden Wildlife Journal", (iv) "Singsation!", (v) "Creflo A. Dollar Jr." were the subject of a primary transmission by television station (i) KMGH, Denver, (ii) KTVU, Oakland, (iii) KABC, Los Angeles, (iv) WGN, Chicago, (v) WAGA, Atlanta on (i) July 7, 2001, (ii) April 7, 2001, (iii) January 6, 2001, (iv) February 18, 2001, (v) February 18, 2001, and were retransmitted on a distant signal basis on that date by cable systems known as (i) GCI Cable, Inc., (ii) Cox Communications, (iii) NPG Cable Corp. of Arizona, (iv) Allen's Cable TV Service, (v) Northland Cable TV Properties Seven which serve (i) Bethel, Alaska, (ii) Eureka, California, (iii) Blythe, California, (iv) Morgan City, Louisiana, (v) Sandersville, Georgia. The claimants of the foregoing programs are (i) Video Tours Inc./Litton Syndications, (ii) Watercourse Road Productions LLC, (iii) Grandolph Juravic Entertainment, LLC (iv) Willie Wilson Productions, Inc., and (v) Creflo A. Dollar Ministries.

If there are any questions concerning this claim, please contact the undersigned. All correspondence should be sent to Worldwide Subsidy Group, 9903 Santa Monica Blvd., #655, Beverly Hills, California 90212, (310) 446-1768 (phone), (310) 446-9978 (fax), e-mail: worldwidesg@bigplanet.com.

Artist Collections Group, LLC  
dba Worldwide Subsidy Group  
9903 Santa Monica Blvd., #655  
Beverly Hills, California 90212

By (signature):   
Typed/Printed Name: Marian Oshita  
Title: President

Date: July 31, 2002

**RECEIVED**

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AUG 05 2002

GENERAL COUNSEL  
OF COPYRIGHT

Artist Collections Group d/b/a Worldwide Subsidiy Group

Exhibit A

Claimant	Address	City, State, Country
1st Miracle Pictures	3439 West Cahuenga Blvd.	Hollywood, CA 90068
3DD Entertainment Ltd.	190 Camden High Street	London NW1 8QP
A&E Television Network	235 E. 45th	New York, NY 10017
A.G. Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
A.V. Video-Million Dollars Enterprises	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
ABC Cineproducciones	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Abrams Gentle Entertainment	244 W. 54th St., 9th Floor	New York, NY 10019
Academy of Television Arts and Sciences	5220 Lankershim Blvd.	North Hollywood, CA
Acuario Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Adams Golf	2801 East Plano Parkway	Plano, TX 75074
Advantage Media Group	4298 Bright Bay Way	Ellicott City, MD 21042
Adventure Pictures Ltd.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Aguila Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Aiete Films, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Alameda Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Aldebaran Films, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Aleph Producciones	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Alfa Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Alianza Cinematografica Mexicana	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain

Claimant	Address	City, State, Country
Alpha Centauri	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
America Producciones, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
American Film Institute (AFI)	2021 North Western Ave.	Los Angeles, CA 90027
American Film Investment Corporation dba Golden Films Entertainment	2400 Sand Hill Road, Ste. 201	Menlo Park, CA 94025
Aiheuser-Busch Companies, Inc.	One Busch Place	St. Louis, MO 63118
Arco Films, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Ardent Productions	The Old Stables, Bagshot Park	Bagshot, Surrey GU19 5PJ
Arenafilms Pty Ltd.	Level 2, 270 Devonshire Street	Surry Hills, NSW 2010, Australia
Arenal Producciones	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Argentina Sono Film Saci	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Argos Producciones	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Aries Cinematografica Argentina, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Artist and Idea Management, Ltd.	1 Astor Place, 5-S	New York, NY 10003
Artist Collections Group LLC dba Worldwide Subsidy Group	9903 Santa Monica Blvd., #655	Beverly Hills, CA 90212
Asbreil Productions, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Atenea Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Atlantic 2000	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Atlantic Films	9080 Santa Monica Blvd.	Los Angeles, CA
Audio Servicios Larsa, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain

Artist Collections Group d/b/a Worldwide Subsidiary Group

Claimant	Address	City, State, Country
Audio Video Los Angeles	c/o EGEDA, Luis Buñuel, 2 - 3 <sup>o</sup> . Ciudad de la Imagen 700 Harris Street	Pozuelo de Alarcón, Madrid 28223, Spain
Australian Broadcasting Corporation	J. Muyskenweg, 22	Ultimo, NSW 2007, Australia
AVA Productions B.V.	850 Old Country Road, 2nd Floor	NL-1096 CJ Amsterdam
Aviva International LLC		Belmont, CA 94002
Azteca Films		
B.R.B. Internacional, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3 <sup>o</sup> . Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Bausan Films, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3 <sup>o</sup> . Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
BBC Worldwide Americas, Inc.	c/o EGEDA, Luis Buñuel, 2 - 3 <sup>o</sup> . Ciudad de la Imagen 747 3rd Avenue, 6th Floor	Pozuelo de Alarcón, Madrid 28223, Spain
BBL Distribution	7800 Beverly Blvd., Ste. 337	New York, NY 10017
Beacon Communications Corp.		Los Angeles, CA 90212
Beil-Phillip Television Productions, Inc.	1041 N. Formosa Ave., Santa Monica Bldg., Ste. 207 7800 Beverly Blvd., Ste. 337	Los Angeles, CA 90046
Benny Hinn Ministries	P.O. Box 16847	Los Angeles, CA 90212
Big Events Company		Irving, TX 75016
BKS Entertainment	CSI House, 177-187 Arthur Road	London SW198AE UK
Bocaboca Producciones, S.L.	250 West 54th St., Ste. 807	New York, NY 10019
Boutique Casual	c/o EGEDA, Luis Buñuel, 2 - 3 <sup>o</sup> . Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
C/F International, Inc.	c/o EGEDA, Luis Buñuel, 2 - 3 <sup>o</sup> . Ciudad de la Imagen Box 4, 2550 Willow Lane	Pozuelo de Alarcón, Madrid 28223, Spain
Cabrera Films		Thousand Oaks, CA 91361
Canal Caracol/Television Federal	c/o EGEDA, Luis Buñuel, 2 - 3 <sup>o</sup> . Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
	c/o EGEDA, Luis Buñuel, 2 - 3 <sup>o</sup> . Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain

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Artist Collections Group d/b/a Worldwide Subsidiary Group

Exhibit A

Claimant	Address	City, State, Country
Cappy Productions	118 East 57th Street	New York, NY 10022
Capricornio Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3º. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Canal Producciones Audiovisuales, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3º. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cascade	Cowcaddens	Glasgow G2 3PR
Cascade Films Pty Ltd	c/o Roth Warren, Solicitors, Level 5, 121 Flinders Lane	Melbourne VIC 3000, Australia
Cenpro Television	c/o EGEDA, Luis Buñuel, 2 - 3º. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Central City Productions	223 W. Erie, Ste. 7NW	Chicago, IL 60610
Centre D'Estudis Cinematografics De Catalunya	c/o EGEDA, Luis Buñuel, 2 - 3º. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Centro De Producciones Audiovisuales, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3º. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cesar Fernandez Ardevin Ruiz	c/o EGEDA, Luis Buñuel, 2 - 3º. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Channel Four Television	c/o EGEDA, Luis Buñuel, 2 - 3º. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cheaters International	c/o EGEDA, Luis Buñuel, 2 - 3º. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Chesler/Perimutter Productions	4516 Lovers Lane, Box 104	Dallas, TX 75225
Chicago Scorpion, S.A.	129 Yorkville Ave., Suite 200	Toronto, Ont. M5R 1C4
Chorion Intellectual Properties Ltd.	c/o EGEDA, Luis Buñuel, 2 - 3º. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cifesa-Compania Industrial Film Espanol	Vernon House, 40 Shaftesbury Avenue	London, W1V7DD, U.K.
Cima Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3º. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cine Falcon Producciones, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3º. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cine Vision, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3º. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain

Artist Collections Group d/b/a Worldwide Subsidy Group

Exhibit A

Claimant	Address	City, State, Country
Cinematografica Calderon, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica Coloso	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica De Occidente, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica Eli, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica Filmex, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica Galindo/Filmadora	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica Grovas	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica Intercontinental	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica Jalisco, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica Latinoamerica	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica Marco Polo, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica Roca S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica Sol, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematografica Tabasco, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinematograficas Rosario	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinemax-Producciones Laser	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cineproducciones Internacionales, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cineproducciones Invs De Mexico, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cinetel	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain

Artist Collections Group d/b/a Worldwide Subsidiary Group

Exhibit A

Claimant	Address	City, State, Country
Cometa Prod.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Compania Audiovisual Imaginografo, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Compania Mexicana De Peliculas	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Computer Personalities Systems, Inc.	c/o Oberman, Rebmann, 1617 JFK Blvd.	Philadelphia, PA 19103
Coniacite Uno	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Conus Communications Company L.P.	3415 University Avenue	St. Paul/Minneapolis, MN 55414
Corday Productions	c/o Goldman & Kagan, 1801 Century Park East, #2222	Los Angeles, CA 90067
Cosgrove-Meurer Productions	4303 W. Verdugo	Burbank, CA 91505
Costa Fims, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Creative Children's Group Ltd.	[see Litton Syndications]	
Credito A. Dollar Ministeries	c/o Brewer, et al., 1159 Coltonwood Lane, Ste. 150	Irving, TX 75038
Cromosoma, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cromwell Productions	Suite 11, Central Chambers, Cooks Alley	Stratford-Upon-Avon, CV37 6QN
Cub-Mex, S.A. - Elite Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cumbre Films, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cyril De Rouve	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Cyrk, S.A. Film & Video Prod.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
D'An Fran Producciones	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Daniel Hernandez Productions	397 Bay Shore Avenue	Long Beach, CA 90803

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Artist Collections Group d/b/a Worldwide Subsidiy Group

Exhibit A

Claimant	Address	City, State, Country
David Finch Distribution Ltd. fka David Finch Associates	P.O. Box 264, Walton-on-Thames	Surrey KT12 3YR England
Decode Entertainment, Inc.	512 King Street East, Ste. 104	Toronto, Ontario Canada M5A 1M1
Delsa Distribuciones Delgado Sanchez, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Diafragma Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Diagrama Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Diamante Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Diana Internacional Films, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Direct 2U, Inc.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Dirsol, S.A.	c/o Oberman, Rebmann, 1617 JFK Blvd.	Philadelphia, PA 19103
Distraction Formats	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
D'Ocon Films Productions, S.A.	35, rue Washington	75008 Paris FRANCE
DreamWorks SKG	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Eagle Mountain Int'l Church (Kenneth Copeland Ministries)	100 Universal Plaza, Bldg. 10	Universal City, CA 91608
Eagle Rock Entertainment	c/o Brewer, 1159 Cottonwood Lane, Ste. 150	Irving, TX 75038
EICTV	22 Armoury Way	Wandsworth, London U.K. SW18 1EZ
El Gran Bablazo	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
El Teatro Campesino	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Elias Querejeta P.C., S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
EMAV	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain

Claimant	Address	City, State, Country
Endi Blyton Limited	[see Chorion Intellectual Properties Ltd.]	
Enoki Films USA, Inc.	16501 Ventura Blvd., Ste. 606	Encino, CA 91436
Enrique Cerezo P.C., S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Enriquejeta Foret Jimeno	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Ensueno Films, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Entertainment Rights PLC (ka SKD Media (Sleepy Kid Co. Ltd.)	31 St. Petersburg Place	London W2 4LA
Entidad De Gestion De Derechos De Los Productores Audiovisuales ("Egeda")	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Escuela De Cine De La Comunidad De Madrid (E.C.A.M.)	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Esmeralda Producciones	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
ESPN	605 Third Ave., 11th Floor	NY, NY 10158-0180
Estela Films, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Estrella Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Estudios America, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Estudios Churubusco Azteca, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
European Pictures B.V.	Schipholweg 79	Pozuelo de Alarcón, Madrid 28223, Spain
Euskal Telebista, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	2316 ZL Leiden, Netherlands
Excalibur Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
F. Mier, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
F.O.R.T.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain

Artist Collections Group d/b/a Worldwide Subsidiary Group

Exhibit A

Claimant	Address	City, State, Country
Faro Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen FIFA House, 11 Hitzigug, 8030	Pozuelo de Alarcón, Madrid 28223, Spain
Fédération Internationale de Football Association Fernando Soler		Zürich, Switzerland
Ficción Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Fiesta Film Inc.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Figaro Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Filmadora Chapultepec	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Filmar	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Filmayer International, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Filmex	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Filmiline International 1999 Inc.	410 St-Nicolas Street, Suite 10	Montreal Qc. Canada H2Y 2P5
Filmoimagen, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Films By Jove	11325 Sunshine Terrace	Studio City, CA 91604
Films Mundiales	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Fintage House Publishing and Collection	Schipholweg 79	2316 ZL Leiden, Netherlands
Fishing University, LLC	290 Leatherwood Drive	Winchester, TN 37398
Fitness Quest, Inc.	1400 Raiff Road SW	Canton, OH 44750
Five Star Productions aka 5 Star Productions	430 S. Congress Avenue	DeRay Beach, FL 33445
Flashpoint (UK) Ltd.	66 Wigmore	London W1A 3RT, U.K.
Flesh and Blood Inc.	14 Duncan St., Suite 203	Toronto Ontario M5H 3G8 Canada

Artist Collections Group d/b/a Worldwide Subsidy Group

Exhibit A

Claimant	Address	City, State, Country
Flying Tomato Films	11755 Victory Blvd., Ste. 103	North Hollywood, CA 91606
Focus Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
France Animation	14, Rue Alexander Parodi	75010 Paris
Freewheelin' Films, Ltd.	Box 599	Aspen, CO 81612
Frontera Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Funimation	6851 N.E. Loop 820, Ste. 247	Ft. Worth, TX 76180
Gabriel Communications	c/o Seting Rooks & Ferrara LLP, 254 West 54th, 14th Floor	New York, NY 10019
Gaumont International	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Gazcon Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Gazcon Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
General Belgrano	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Gestevisión Telecinco, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Global Response LLC	708 South Third St., #108	Pozuelo de Alarcón, Madrid 28223, Spain
Golden Films Finance Corporation dba Golden Films Entertainment	2400 Sand Hill Road, Ste. 201	Minneapolis, MN 55415
Gonafilm, S.A.		Menlo Park, CA 94025
Gorky Studios	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Goyri Y Lopez Asociados	[see Magus]	
Grandolph Juravic Entertainment, LLC	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Greenlight Entertainment B.V.	R.F.D. 1680 Bordeaux Amperestraat 10	Long Grove, IL 60047
Gregorio Wallerstein	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	1221 GJ Hilversum, The Netherlands
		Pozuelo de Alarcón, Madrid 28223, Spain

Artist Collections Group d/b/a Worldwide Subsidiary Group

Exhibit A

Claimant	Address	City, State, Country
Grupo Cine Arte, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Grupo De Produccion Audiovisual Internacional ICAIC	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Grupo Galindo S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Grupo Imagen Producciones	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Grupo Laser	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Grupo Televisa, S.A.	[see Televisa, S.A. de C.V.]	
GTSP Records	c/o Steve Callas Assoc., 12424 Wilshire Blvd., Ste. 1150	Los Angeles, CA 90025
Herederos De Don Miguel Tudela Lopez	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Hermes Films Internacional, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Hispamer Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
HLB Productions	1057 31st Street South	Birmingham, AL 35205
Holden Productions	3800 Commerce St., #209	Dallas, TX 75226
Home Enterprises	3411 Silverside Road	Wilmington, DE 19810
Human Voices Pty Ltd.	Level 1, 111 Nott Street	Port Melbourne VIC 3207, Australia
Iberoamericana Films Production, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
ICAIC	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Image Entertainment, Inc.	9933 Oso Avenue	Chatsworth, CA 91311
Impulsora Cinematografica	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Instituto Mexicano De Cinematografia	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Integrity Global Marketing	4735 Belpar St. N.W.	Canton, OH 44718

Artist Collections Group d/b/a Worldwide Subsidiy Group

Exhibit A

Claimant	Address	City, State, Country
Inter Catel, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Interbalsa, S.A./Películas Digitales, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Internacional Cinematografica	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Irati Filmak, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Ismael Gonzalez, P.C.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Izaro Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Jay Ward Productions	8200 Sunset Blvd.	Pozuelo de Alarcón, Madrid 28223, Spain
JCS Entertainment II	4676 Admiralty Way, Ste. 300	Los Angeles, CA 90046
Jorge Aguirre	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Marina Del Rey, CA 90292
Jorge Duran Chavez	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Jose Frade, P.C., S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Jose Maria Blay Castillo Produccion	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
JTV Production Group	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Kid Friendly Productions	2550 Cattleman Way	Pozuelo de Alarcón, Madrid 28223, Spain
Kinnevik Media Properties	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Paso Robles, CA 93446
Knight Scenes Incorporated	1333 H St. NW, West Tower, 10th Floor	Pozuelo de Alarcón, Madrid 28223, Spain
Lacey Entertainment	1414 Avenue of the Americas, 3rd Floor	Washington, D.C. 20005
LaFonda Partners	4401 Albert Circle	New York, NY 10019
Laro Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Lake Oswego, OR 97035
Larsa, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
		Pozuelo de Alarcón, Madrid 28223, Spain

Artist Collections Group d/b/a Worldwide Subsidy Group

Exhibit A

Claimant	Address	City, State, Country
Laser Amadeus	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Les Distributions Rozon Inc./ Just For Laughs	2101 St. Laurent Blvd.	Montreal (Quebec) Canada H2X 2T5
Lester Welch Productions, Inc.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Libra Films	[see Magus Entertainment]	
Lifetime Entertainment Services dba Lifetime Television	309 W. 49th St.	New York, NY 10019
Lince Films, S.L.		
Link Television Entertainment	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Lipscomb Entertainment	10339 Whipple Street	Toluca Lake, CA 91602
Litton Syndications	P.O. Box 291598	Los Angeles, CA 90029
Lola Films, S.A.	2213 Middle St., 2nd Floor	Sullivan's Island, SC 29482
Los Tigres Del Norte	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Lotus Films Internacional, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
M.V.Z. Catering, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Maestranza Films, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Magnum Y Variedades En Video, S.A. / Rana Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Magus Entertainment	imperestraat 10, 1221 GJ Hilversum	The Netherlands
Mainframe Entertainment	710-1045 Howe St.	Vancouver, BC Canada V6Z 2A9
Maleta Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Mansfield Television Distribution Company	9291 Pikes Peak Way	Parker, CO 80138
Marathon International	74, Rue Bonaparte	75006 Paris, France

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Claimant	Address	City, State, Country
Marea Suave	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen 1375 Broadway, 21st Floor	Pozuelo de Alarcón, Madrid 28223, Spain
Mark Anthony Entertainment		
Marte Films Internacional S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	New York, NY 10018
Mate Production, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Marouk Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Medio Metro Limitada	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Mega Entertainment International	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Messidor Films, S.L.	150 West 25th Street, # 503	New York, NY 10001
Metro De Oro Producciones	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Metro Oro Producciones	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Mexinema Video Corp. - Producciones Potosi, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Miguel Angel Martinez Producciones	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Millenia Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Minotaur International Ltd.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Mom U.S.A. Inc.	160 Great Portland St.	London W1N 5TB
Motion Pictures, S.A.	[see Litton Syndications]	
Muggers Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Music & Media International	First Floor, 111 Nott Street	
Nabisco, Inc.	8756 Holloway Dr.	Port Melbourne VIC 3207, Australia
Nacional Cinematografica	c/o Cokin Communications, 75 Washington Blvd.	West Hollywood, CA 90069
Nanitta Inversiones, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Slamford, CT 06901
	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
		Pozuelo de Alarcón, Madrid 28223, Spain

Claimant	Address	City, State, Country
National Academy of Television Arts and Sciences	111 W. 57th Street	New York, NY 10019
Neptuno Films Productions, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen 1000 Film Way	Pozuelo de Alarcón, Madrid 28223, Spain
New Dominion Pictures LLC		Suffok, VA 23434
New Vision De Mexico, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen P.O. Box 599	Pozuelo de Alarcón, Madrid 28223, Spain
New Visions Syndication, Inc.		Aspen, CO 81611
Noski Productions, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Nur/Hart Hair Clinics, Inc.	Seven Parkway Center, 875 Greeniree Road, Ste. 240	Pittsburg, PA 15220
Nur/Hart-Hair Solutions, Inc.	1414 Avenue of the Americas, Ste. 403	New York, NY 10019
NVC Arts	The Forum, 74-80 Camden St.	London NW1 0EG, UK
O. Alias Enterprise, Inc. aka Alias Enterprises	8383 Wilshire Blvd., Ste. 339	Los Angeles, CA 90211
Olympia Producciones		
Origen Producciones Cinematograficas, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Orofilms, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Orsen & Brett, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Over the Edge-TV	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
P.C. Marujita Diaz (MD)	401 Morris Avenue, Studio 1	Springfield, NJ 07081
P.R.P. Producciones De Cine Y Television, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Panamerican Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Panorama Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Passionfruit Productions Pty Ltd.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen Unit 2/3 Lowe Street	Pozuelo de Alarcón, Madrid 28223, Spain Clovelly 2031, Australia

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Claimant	Address	City, State, Country
Passport International Productions	10520 Magnolia Blvd.	North Hollywood, CA 91601
Pathe Fund Limited	Kent House, Market Place	London W1N 8AR, U.K.
Patria Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Pedro Maso Producciones Cinematográficas, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Películas Cinemax, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Películas Digitales, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Películas Mundiales/TV Producciones, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Películas Y Videos Internacionales, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
PelimeX, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Planet Pictures	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Ploygram Iberica, S.A.	4764 Park Granada, Suite 208	Calabasas, CA 91302
PM Entertainment	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Posa Film, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Postproduccion Profesional	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Premier Productions	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Prod. Aguirre Valdes	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Prodifilms, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Produc. Interna. Reynoso	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Aguila	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Baja Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain

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Claimant	Address	City, State, Country
Producciones Calderon	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Carlos Amador	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones CCSA	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Cinematograficas Aner	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Cinematograficas, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Corsa	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Escorpion	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Filmicas Agrasanchez, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Gaer	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Galubi, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Gonzalo Eivira, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Jaguar	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Juno	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Laser	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Latinas Americanas, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Matouk	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Mercurio	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Piramide	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Potosi	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain

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Claimant	Address	City, State, Country
Producciones Potosi, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Raul De Anda, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Rosas Priego, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Tijuana	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Torreón, S.A. Ce Cuernavaca	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Universal	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Viejo, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Zaracarias, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Producciones Zyonya	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Promark Television Inc.	323 S. Doheny Dr., #301	Pozuelo de Alarcón, Madrid 28223, Spain
Psychic Readers Network	c/o Klein, Zelman, et al., 485 Madison Ave	Los Angeles, CA 90048
Pyrene, P.V., S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	New York, NY 10022
Quartet International, Inc.	20 Butternut Dr.	Pozuelo de Alarcón, Madrid 28223, Spain
Questar Video aka Questar, Inc.	680 North Lake Shore Dr., #900	Pearl River, NY 10965
R.M. Producciones	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Chicago, IL 60611
Radeant Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Rafael Sabater Producciones	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Rafael Salvador Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Raycom Sports	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Red Apple Entertainment Corporation	2315 Coliseum Center Drive, Ste. 200	Charlotte, NC 28217
	1 St. Clair Avenue West, Suite 503	Toronto, Ontario M4V 1K7

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Claimant	Address	City, State, Country
Reel Funds International, Inc. dba Reel Media International Richard Gabal	4516 Lovers Lane, Suite 178 c/o Check Entertainment, 5633 Noble Avenue	Dallas, TX 75225 Van Nuys, CA 91411, U.S.A.
Rocabruno, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Rosas Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Royal S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
RTI Colombia	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
S.T.P.C.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Sabre Television, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Saena, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Samuel Menkes Pilo	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Sandra Carter Productions	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Sanen, S.A.	230 W. 79th St., #102	New York, NY 10024
Sarrazin Couture Entertainment	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Scholastic Productions, Inc.	14 Duncan St., Suite 203	Toronto Ontario M5H 3G8 Canada
Scott Free Productions	524 Broadway, 5th Floor	New York, NY
SEKAM	9348 Civic Center Dr., Mezz Fir. Postbus 581, 1000 AN	Beverly Hills, CA 90210 Amsterdam, Netherlands
Sergio Lieman Asseo.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Share Total, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Showtime Television	10880 Wilshire Blvd., Suite 1600	Los Angeles, CA 90024
Sky Visuals	133 Dowling Street	Woolloomooloo NSW 2011, Australia

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Claimant	Address	City, State, Country
Sogecine (Sociedad General De Cine, S.A.)	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Sol, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Splendid Film GmbH	Aldorfer Strasse 3	D-50933 Koln (Cologne) Germany
Sportsworld	6 Henrietta Street, Covent Garden	London WC2E 8PS UK
St Jude Children's Hospital	501 St. Jude's Place	Memphis, TN 38105
Star Line T.V. Productions, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Stone Stanley Entertainment	1040 N. Las Palmas	Hollywood, CA 90038
Streamline Pictures	8624 Wilshire Blvd.	Beverly Hills, CA 90211
Sur Cinematografica Argentina	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Tabare-Antoni Ribas	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Tauro Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Team Communications Group aka Team Entertainment Group	11818 Wilshire Blvd., 2nd Floor	Los Angeles, CA 90025
TearDrop Golf	8350 N. Le High	Morton Grove, IL 60053
Tecnicos Y Manuales	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Tele Talia Films	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Telefe (Televisión Federal Internacional, S.A.)	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Telemundo	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Telerey, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Televisine	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Televisine, S.A. de C.V.	Ave. Vasco de Quiroga No. 2000, Edif. "A"	Col. Zedec Santa Fe, 01210, Mexico City

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Claimant	Address	City, State, Country
Televisa Internacional, S.A.	6355 Northwest 36th Street	Miami, Florida 33166
Televisa, S.A. de C.V.	Ave. Vasco de Quiroga No. 2000, Edif. "A"	Col. Zedec Santa Fe, 01210, Mexico City
Televisió De Catalunya, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Television De Galicia, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Television Espanola	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Tele-Voz	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Tepuy International	2745 Ponce de Leon Blvd.	Pozuelo de Alarcón, Madrid 28223, Spain
TF1 International S.A.	123-125, Rue Jean-Jacques Rousseau	Coral Gables, FL 33134
TF1 International/Ciby D.A.	305 Avenue Le Jour Se Leve	92138 Issy-Les-Moulineaux, France
The City Productions Inc.	14 Duncan St., Suite 203	9265 Boulogne, Cedex, France
The Media Source	520 N. Highland Ave.	Toronto Ontario M5H 3G8 Canada
The Television Syndication Company, Inc.	501 Sabal Lake Drive, Ste. 105	Upper Nyack, NY 10960
Thomas Horton Associates	408 Bryant Circle, Suite K	Longwood, FL 32779
Tiburón TV, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Ojai, CA 93023
Tide Entertainment	1120 Gator Trail	Pozuelo de Alarcón, Madrid 28223, Spain
Tijuana	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Palm Beach, FL 33409
Timberwolf Productions	8051 State Highway 34	Pozuelo de Alarcón, Madrid 28223, Spain
Today's Homeowner	1480 Cody Road South	Marble Hill, MO 63764
Tomasol Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3°. Ciudad de la Imagen	Mobile, AL 36695
Tremendous Entertainment	17113 Minnetoka Blvd.	Pozuelo de Alarcón, Madrid 28223, Spain
Urban Latino TV, LLC	1 Astor Place, 5-S	Minnetonka, MN 55345
TV Guide	2121 Ave of Americas, 4th Floor	New York, NY 10003
		New York, NY 10036

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Claimant	Address	City, State, Country
TV Matters	De Ruyerkade 142 38 Fernwood	1011 AC Amsterdam, Netherlands
TVD Productions	Münchener Str. 16, 85774 Unterföhring	Montgomery, IL 60538
TV-Loonland AG	8260 Willow Oaks Corporate Drive	München, Germany
United Negro College Fund	One Olympic Plaza	Fairfax, VA 22031
United States Olympic Committee	c/o EGEDA, Luis Buñuel, 2 - 3° Ciudad de la Imagen	Colorado Springs, CO 80909
Universidad Del Cine	1 Astor Place, 5-S	Pozuelo de Alarcón, Madrid 28223, Spain
Urban Latino TV, LLC	c/o EGEDA, Luis Buñuel, 2 - 3° Ciudad de la Imagen	New York, NY 10003
Vanguard Films	c/o EGEDA, Luis Buñuel, 2 - 3° Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Venevision Internacional	c/o EGEDA, Luis Buñuel, 2 - 3° Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Vertigo Productions Pty Ltd.	3 Butler Drive	Hendon 5014, Australia
Video Mercury Films, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3° Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Video Producciones, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3° Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Video Tours Inc.	15 New Britain Avenue	Unionville, CT 06085
Video Universal, S.A. De C.V.	c/o EGEDA, Luis Buñuel, 2 - 3° Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Videocine, S.A. de C.V.	Ave. Vasco de Quiroga No. 2000, Edif. "A"	Col. Zedec Santa Fe, 01210, Mexico City
Videofon, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3° Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Videomedia, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3° Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Vientinueve, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3° Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Vivavision Inc. fka Productions JBM Inc.	1973 Fairdeau	Montreal (Quebec) H2K 2L9 Canada
Vulcano P.C.	c/o EGEDA, Luis Buñuel, 2 - 3° Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain
Vulpi Yuri, S.A.	c/o EGEDA, Luis Buñuel, 2 - 3° Ciudad de la Imagen	Pozuelo de Alarcón, Madrid 28223, Spain

Artist Collections Group d/b/a Worldwide Subsidiy Group

Exhibit A

Claimant	Address	City, State, Country
Wanda Films, S.L.	c/o EGEDA, Luis Buñuel, 2 - 3º Ciudad de la Imagen 100 N. Hope Ave., Ste. 18 26 Punch Street	Pozuelo de Alarcón, Madrid 28223, Spain
Watercourse Road Productions LLC		
Wave Entertainment		
West 175 Enterprises, Inc.	2203 Airport Way Street, Ste. 801	Santa Barbara, CA 93110
Wild Heart Productions		Artarmon, NSW 2064, Australia
Wild Visuals	133 Dowling Street	Seattle, WA 98134
Willie Wilson Productions, Inc.	133 Dowling Street	Woolloomooloo NSW 2011, Australia
Winchester Entertainment PLC	P.O. Box 129	Woolloomooloo NSW 2011, Australia
Worldwide Pants, Inc.	29/30 Kingly Street	Matterson, IL 60443
Yoram Gross	1697 Broadway	London W1R 5LB
	62-68 Church Street	New York, NY 10019
		Camperdown NSW 2050, Australia

\*

# **EXHIBIT 58**

CABLE CLAIM - - COPYRIGHT ARBITRATION ROYALTY PANEL

001: 518

Worldwide Subsidy Group, a Texas limited liability company, dba Independent Producers Group does hereby file, on behalf of itself and all other parties listed on the attached Exhibit A, a claim to compulsory license fees pursuant to 17 U.S.C. Section 111(d)(4)(A) and 37 C.F.R. Section 252.3 for secondary transmissions by cable systems during the period January 1, 2001 through December 31, 2001. All parties in whose names the claim herein is filed have duly authorized the above party to make this filing on their behalf. In compliance with 37 C.F.R. Section 252.3, said claimant hereby furnishes the following information:

1. The full legal name of the persons or entities claiming compulsory license fees is:  
See attached Exhibit A.

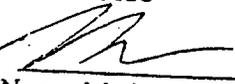
2. The full address of the place of the claimants place of business, including phone/fax number is: 2318 Sawgrass Ridge, San Antonio, Texas 78258, (830) 438-8881 (phone), (830) 438-8882 (fax)

3. The nature of the copyrighted works whose secondary transmissions provide the basis of the claim is:  
TELEVISION PROGRAMS AND/OR WORKS INCLUDED IN SUCH PROGRAMMING OR TRANSMISSION

4. On the basis of information and belief, our copyrighted programs (i) "Titanium Knives", (ii) "Home Again With Bob Vila", (iii) "Feed The Children", (iv) "Jack Van Impe Presents", (v) "Better Homes and Gardens" were the subject of a primary transmission by television stations (i) KTVU, Oakland, (ii) WBZ, Boston, (iii) WSBK, Boston, (iv) WDCA, Washington, (v) WBZ, Boston on (i) March 2, 2001, (ii) November 17, 2001, (iii) October 28, 2001, (iv) November 12, 2001, (v) February 11, 2001, and were retransmitted on a distant signal basis on those dates by cable systems known as (i) Cox Communications, (ii) Adelpia Communications, (iii) Bee Line, Inc., (iv) Comcast Cablevision, (v) Adelpia Communications which serve (i) Eureka, California, (ii) Lincoln, New Hampshire, (iii) Millinocket, Maine, (iv) Salisbury, Maryland, (v) Lincoln, New Hampshire. The claimants of the foregoing programs are (i) Best Direct (International) Ltd., (ii) BVTV, Inc., (iii) Feed The Children, Inc., (iv) Jack Van Impe Ministries International, and (v) Meredith Corporation.

If there are any questions concerning this claim, please contact the undersigned. Please send a copy of any correspondence to Independent Producers Group, 2318 Sawgrass Ridge, San Antonio, Texas 78258, (830) 438-8881 (phone), (830) 438-8882 (fax), e-mail: info@independentproducers.org.

Worldwide Subsidy Group, LLC  
dba Independent Producers Group  
2318 Sawgrass Ridge  
San Antonio, Texas 78258

By (signature):   
Typed/Printed Name: Marian Oshita  
Title: President

Date: July 31, 2002

**RECEIVED**  
U.S. postmark 7/31/02  
AUG 05 2002  
GENERAL COUNSEL  
OF COPYRIGHT

Worldwide Subsidiary Group dba Independent Producers Group

Exhibit A

Claimant	Address	City, State, Country
Amity Film & Video Productions Ltd.	30 High Street, First Floor	Godalming, Surrey GU7 1DZ, U.K.
As Seen On TV	2444 Innovation Way	Rochester, NY 14624
Atlantic Film Corporation	Celtic House, Amberly Place	Windsor, Berks SL4 1TN
Atlantic Film Partners, c/o Wigmore Co.	88 Baker Street	London, W1U 6TQ, U.K.
Béckmann International	Meadow Court, West Street	Ramsey, Isle of Man, 1M8 1AE British Isles
Best Direct (International) Ltd.	167 Imperial Drive	Harrow, Middlesex HA2 7JP, U.K.
Big Feats Entertainment, L.P.	c/o HIT Entertainment, 830 South Greenville Avenue	Allen, TX 75002
Billy Graham Evangelistic Association	1300 Harmon Place	Minneapolis, MN 55403
Bob Ross, Inc.	P.O. Box 946	Sterling, VA 20167
Breakthrough Films & Television	122 Sherbourne Street	Toronto, Ontario, M5A 2R4 Canada
BVTV, Inc.	115 Kingston St., 3rd Floor	Boston, MA 02111
C21C Limited	55 Loundown Road	London NW80DL, U.K.
Cambium Film & Video Productions Ltd.	[see CCI Entertainment]	
Carol Reynolds Productions, Inc.	199 Bay Street, Ste. 5300	Toronto, Ontario, M5L 1B9 Canada
CCI Entertainment	18 Dupont St.	Toronto, Ontario, M5R 1V2 Canada
CCI Releasing	[see CCI Entertainment]	
Cinemaginaire Inc.	5144, boul. Saint-Laurent	Montreal, Quebec, Canada H2T1R8
Cinemavault Releasing Inc.	[see S Entertainment, Inc.]	
Cirque du Soleil	8400 2nd Avenue	Montreal, Quebec, Canada H1Z 4M6

Worldwide Subsidiary Group dba Independent Producers Group

Exhibit A

Claimant	Address	City, State, Country
Cogeco Radio-Television Inc.	3720 Boul. Industriel	Sherbrooke, Quebec, Canada J1L 1Z9
Devillier Donegan Enterprises, L.P.	4401 Connecticut Avenue, N.W.	Washington, D.C. 20008
Direct Cinema, Ltd.	P.O. Box 10003	Santa Monica, CA 90410
Dragon Tales Productions	[see Breakthrough Films]	
Ego Film Arts	80 Niagra Street	Toronto, Ontario, M5V 1C5 Canada
Envoy Productions	660 Mason Ridge Center Drive	St. Louis, MO 63141
Equestrian Vision	Horsham Road	Horsham, West Sussex RH13 8BP U.K.
Farm Journal Electronic Media Company	25 Executive Drive, Ste. A	Lafayette, IN 47905
Feed the Children, Inc.	P.O. Box 36	Oklahoma City, OK 73101
Firing Line	c/o National Review, 215 Lexington Avenue	New York, NY 10016
Florentine Films / Hoyt Productions, Inc.	20 Kingsley Ave.	Haydenville, MA 01039
Glittering Clowns Electronic Publ. Co. Ltd.	Estate Office, Exbury	Southampton SO45 1AZ, U.K.
Great Plains National Instructional Library	1800 North 33rd St.	Lincoln, NE 68583
Hawthorne Direct	300 N. 16th Street	Fairfield, Iowa 52556
Imagex Ltd.	1190 Barrington St., 4th Floor	Halifax, Nova Scotia, Canada B3H 2R4
Inca	67 Castelnau, Barnes	London SW13 9RT U.K.
Instant Amoureux Inc.	[see Cinemaginaire Inc.]	
Jack Van Impe Ministries International	1718 Northfield Drive	Rochester Hills, MI 48309
Jefferson Pilot Sports	One Julian Price Place	Charlotte, NC 28208
K2 Media Group	5 Park Plaza	Irvine, CA 92614



Worldwide Subsidiary Group dba Independent Producers Group

Exhibit A

Claimant	Address	City, State, Country
Kevin Spencer, Inc.	2740 B Queensview Drive	Ottawa, Ontario, Canada K2B 2A2
King Motion Picture Corporation	1702 Canada Trust Tower, 10104-103rd	Edmonton, Alberta, Canada T5J 0H8
Laura Cadieux Inc.	[see Cinemaginaire Inc.]	
Lawrence Weik Syndication	2700 Pennsylvania Avenue	Santa Monica, CA 90404
Le Confessional Inc.	[see Cinemaginaire Inc.]	
Le Pain Inc.	[see Cinemaginaire Inc.]	
Les Productions Videofilms Limitee	296, rue St-Paul ouest, Ste. 400	Montreal, Quebec, Canada H2Y 2A3
Life Outreach International	1801 W. Eules Blvd.	Eules, TX 76040
Little M Productions	[see Breakthrough Films]	
Lyons Partnership, L.P.	c/o HIT Entertainment, 830 South Greenville Avenue	Allen, TX 75002
Marty Stouffer Productions Ltd.	P.O. Box 5057	Aspen, CO 81612
Mentorn Barraclough Carey Productions Ltd.	[see Mentorn Int'l Distrib. Ltd.]	
Mentorn International Distribution Ltd.	43 Whitfield Street	London W1T 4HA, U.K.
Meredith Corporation	1716 Locust Street	Des Moines, IA 50309
Midwest Center for Stress & Anxiety, Inc.	106 N. Church St., #200	Oak Harbor, OH 43449
Montreal vu par Inc.	[see Cinemaginaire Inc.]	
Mr. Showbiz Productions	[see Breakthrough Films]	
Multimedia Group of Canada	261 du St-Sacrement St.	Montreal, Quebec, Canada H2Y 3V2

Worldwide Subsidy Group dba Independent Producers Group

Exhibit A

Claimant	Address	City, State, Country
Nancy's Notions, Ltd.	333 Beichl Ave.	Beaver Dam, WI 53916
Network Programs International	3150 Ocana Avenue	Long Beach, CA 90808
Ontario Educational Communications Authority	Box 200, Station Q	Toronto, Ontario, M4T 2T1 Canada
Pacific Family Entertainment LLC	642 South B St., Ste. A	Tustin, CA 92780
Paradigm Pictures Corporation	344 Dupont Street, Ste. 206	Toronto, Ontario, M5R 1V9 Canada
Paul Feldman	133 Whitehouse Ave., Boreham Wood	Herts WD6 1HB, U.K.
Peter Rodgers Organization	1800 N. Highland Ave., Ste. 412	Hollywood, CA 90028
Phil Slater Associates	32 Ash Street	Fleetwood, Lancashire, U.K.
PMT, Ltd.	785 Cressman Rd.	Harleysville, PA 19438
Popular History Company	[see Breakthrough Films]	
Production Le Jour Inc.	[see Cinemaginaire Inc.]	
Production Le Siege Inc.	[see Cinemaginaire Inc.]	
Productions Pixcom, Inc.	[see Cinemaginaire Inc.]	
Queen Light Productions	1720 rue du Canal	Montreal, Quebec, Canada H3K 3E6
Ron Hazellon Productions, Inc.	[see Breakthrough Films]	
S Entertainment (1997) inc.	161 West 61st, Ste. 22F	New York, NY 10023
S Entertainment Holdings Inc.	[see S Entertainment, Inc.]	
S Entertainment, Inc.	[see S Entertainment, Inc.]	
	434 Queen Street East	Toronto, Ontario, M5A 1T5 Canada

Worldwide Subsidy Group dba Independent Producers Group

Exhibit A

Claimant	Address	City, State, Country
Salem Baptist Church of Chicago, Inc.	11800 South Indiana Ave.	Chicago, IL 60628
SC Entertainment Holdings Inc.	[see S Entertainment, Inc.]	
SC Entertainment International Inc.	[see S Entertainment, Inc.]	
Shadow Lake Productions	[see Breakthrough Films]	
Simply Fishing, Inc.	1890 Center Street	Hugo, MI 55038
Small World Productions, Inc.	120 Lakeside Ave., #210	Seattle, WA 98122
Sophistry Limited	3 Quayside Street	Edinburgh EH6 6EJ, U.K.
Sound Venture Productions Ottawa Ltd.	126 York Street, Ste. 219	Ottawa, Ontario, Canada K1N 5T5
Sullivan Entertainment International	110 Davenport Road	Toronto, Ontario, M5R 3R3 Canada
Tapestry International Ltd.	11 Hanover Square, 14th Floor	New York, NY 10005
Tempur Pedic Inc.	1713 Jaggie Fox Way	Lexington, KY 40511
The Friendly Kitchen Co.	[see Breakthrough Films]	
Thump Records, Inc.	P.O. Box 445	Walnut, CA 91788
Twin Cities Public Television	[see Beckmann International]	
Unapix Entertainment, Inc.	15910 Ventura Blvd., 9th Floor	Encino, CA 91436
Venevision International	550 Biltmore Way, Ste. 900	Coral Gables, Florida 33134
Video/Media Distribution Inc.	1050 North State Street	Chicago, IL 60610
Westwind Pictures Ltd. (aka 591755 Saskatchewan Ltd.)	#402-2206 Dewdney Ave.	Regina, Saskatchewan, Canada S4R 1H3

Worldwide Subsidiary Group dba Independent Producers Group

Exhibit A

Claimant	Address	City, State, Country
Whamo Entertainment	1850 South Sepulveda Blvd., #201	Los Angeles, CA 90025
Whidbey Island Films, Inc.	3724 Vantage Avenue	Studio City, CA 91604
World Events Productions	1 S. Memorial Drive, Ste. 2000	St. Louis, MO 63102
World Events Productions Ltd.	[see World Events Productions]	
World Wide Pictures	1300 Harmon Place	Minneapolis, MN 55403
Zebby's Zoo Production Inc.	4727 Mill Run Road	New Port Richey, FL 34653

# **EXHIBIT 59**

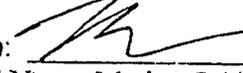
000622

CABLE CLAIM -- COPYRIGHT ARBITRATION ROYALTY PANEL

Worldwide Subsidy Group, LLC, a California limited liability company, does hereby file, on behalf of itself and all other parties listed on the attached Exhibit A, a claim to compulsory license fees pursuant to 17 U.S.C. Section 111(d)(4)(A) and 37 C.F.R. Section 252.3 for secondary transmissions by cable systems during the period January 1, 2002 through December 31, 2002. All parties in whose names the claim herein is filed have duly authorized the above party to make this filing on their behalf. In compliance with 37 C.F.R. Section 252.3, said claimant hereby furnishes the following information:

- 1. The full name of the person or the entity filing claim to royalties, including, address, telephone/fax number: **Worldwide Subsidy Group, LLC, a California limited liability company, 9903 Santa Monica Blvd., #655, Beverly Hills, CA 90212, (310) 446-1768 (phone), (310) 372-1969 (fax)**
- 2. The full legal name and address of the persons or entities entitled to claim the royalty fees: **See attached Exhibit "A".**
- 3. The nature of the copyrighted works whose secondary transmissions provide the basis of the claim is: **TELEVISION PROGRAMS AND/OR WORKS INCLUDED IN SUCH PROGRAMMING OR TRANSMISSION**
- 4. On the basis of information and belief, our copyrighted programs (i) "World of Wildlife #206: Hunters", (ii) "Creflo Dollar", and (iii) "Critter Gitters" were the subject of a primary transmission by television station (i) KUHT-TV, Houston, (ii) KCAL, Los Angeles, and (iii) KCAL, Los Angeles on (i) January 20, 2002, (ii) May 26, 2002, and (iii) January 12, 2002, and were retransmitted on a distant signal basis on that date by cable systems known as (i) Time Warner Communications, (ii) Mediacom California LLC, and (iii) Mediacom California LLC, which serve (i) Port Arthur, Texas, (ii) Kern County, California, and (iii) Kern County, California. The claimants of the foregoing programs are (i) West 175 Productions, Inc., (ii) Creflo A. Dollar Ministries, and (iii) Watercourse Road Productions LLC.

Worldwide Subsidy Group, LLC  
9903 Santa Monica Blvd., #655  
Beverly Hills, CA 90212

By (signature):   
Typed/Printed Name: Marian Oshita  
Title: President

Date: July 15, 2003

**RECEIVED**  
AUG 5 2003  
GENERAL COUNSEL  
OF COPYRIGHT

Claimant	Address	City, State, Country
1st Miracle Pictures	3439 West Cahuenga Blvd.	Hollywood, CA 90068
3DD Entertainment Ltd.	190 Camden High Street	London NW1 8QP
A&E Television Network	235 E. 45th	New York, NY 10017
Abrams Gentile Entertainment	244 W. 54th St., 9th Floor	New York, NY 10019
Academy of Television Arts and Sciences	5220 Lankershim Blvd.	North Hollywood, CA
Adams Golf	2801 East Plano Parkway	Plano, TX 75074
Advantage Media Group	4298 Bright Bay Way	Ellicott City, MD 21042
American Film Institute (AFI)	2021 North Western Ave.	Los Angeles, CA 90027
American Film Investment Corporation dba Golden Films Entertainment	2400 Sand Hill Road, Ste. 201	Menlo Park, CA 94025
Anheuser-Busch Companies, Inc.	One Busch Place	St. Louis, MO 63118
Ardent Productions	The Old Stables, Bagshot Park	Bagshot, Surrey GU19 5PJ
Artist and Idea Management, Ltd.	1 Astor Place, 5-S	New York, NY 10003
AVA Productions B.V.	J. Muyskenweg, 22	NL-1096 CJ Amsterdam
Aviva International LLC	850 Old Country Road, 2nd Floor	Belmont, CA 94002
BBC Worldwide Americas, Inc.	747 3rd Avenue, 6th Floor	New York, NY 10017
Beacon Communications Corp.	120 Broadway, Suite 200	Santa Monica, CA 90401
Benny Hinn Ministries	P.O. Box 16847	Irving, TX 75016
Big Events Company	CSI House, 177-187 Arthur Road	London SW198AE UK
BKS Entertainment	250 West 54th St., Ste. 807	New York, NY 10019
C/F International, Inc.	Box 4, 2550 Willow Lane	Thousand Oaks, CA 91361
Cappy Productions	118 East 57th Street	New York, NY 10022
Cascade	Cowcaddens	Glasgow G2 3PR
Central City Productions	223 W. Erie, Ste. 7NW	Chicago, IL 60610

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Claimant	Address	City, State, Country
Cheaters International	4516 Lovers Lane, Box 104	Dallas, TX 75225
Chesler/Permutter Productions	129 Yorkville Ave., Suite 200	Toronto, Ont. M5R 1C4
Conus Communications Company L.P.	3415 University Avenue	St. Paul/Minneapolis, MN 55414
Corday Productions	c/o Goldman & Kagan, 1801 Century Park East, #2222	Los Angeles, CA 90067
Cosgrove-Meurer Productions	4303 W. Verdugo	Burbank, CA 91505
Creative Children's Group Ltd.	[see Litton Syndications]	
Creflo A. Dollar Ministries	c/o Brewer, et al., 1159 Cottonwood Lane, Ste. 150	Irving, TX 75038
Cromwell Productions	Suite 11, Central Chambers, Cooks Alley	Stratford-Upon-Avon, CV37 6QN
Daniel Hernandez Productions	397 Bay Shore Avenue	Long Beach, CA 90803
David Finch Distribution Ltd. fka David Finch Associates	P.O. Box 264, Walton-on-Thames	Surrey KT12 3YR England
Distraction Formats	35, rue Washington	75008 Paris FRANCE
DreamWorks SKG	100 Universal Plaza, Bldg. 10	Universal City, CA 91608
Eagle Mountain Int'l Church (Kenneth Copeland Ministries)	c/o Brewer, 1159 Cottonwood Lane, Ste. 150	Irving, TX 75038
Eagle Rock Entertainment	22 Armoury Way	Wandsworth, London U.K. SW18 1EZ
Entertainment Rights PLC fka SKD Media (Sleepy Kid Co. Ltd.)	31 St. Petersburg Place	London W2 4LA
ESPN	605 Third Ave., 11th Floor	NY, NY 10158-0180
Fédération Internationale de Football Association	FIFA House, 11 Hitzigug, 8030	Zurich, Switzerland
Filmline International 1998 Inc.	410 St-Nicolas Street, Suite 10	Montreal Qc. Canada H2Y 2P5
Films By Jove	11325 Sunshine Terrace	Studio City, CA 91604
Fishing University, LLC	290 Leatherwood Drive	Winchester, TN 37398
Five Star Productions aka 5 Star Productions	430 S. Congress Avenue	Delray Beach, FL 33445
Flesh and Blood Inc.	14 Duncan St., Suite 203	Toronto Ontario M5H 3G8 Canada

Claimant	Address	City, State, Country
Flying Tomato Films	11755 Victory Blvd., Ste. 103	North Hollywood, CA 91606
France Animation	14, Rue Alexander Parodi Box 599	75010 Paris
Freewheelin' Films, Ltd.		Aspen, CO 81612
Funimation	6851 N.E. Loop 820, Ste. 247	Ft. Worth, TX 76180
Gabriel Communications	c/o Serling Rooks & Ferrara LLP	254 West 54th, 14th Floor
Golden Films Finance Corporation dba Golden Films Entertainment	2400 Sand Hill Road, Ste. 201	Menlo Park, CA 94025
Gorky Studios	[see Magus]	
Grandolph Juravic Entertainment, LLC	R.F.D. 1680 Bordeaux	Long Grove, IL 60047
Greenlight International B.V.	Amperestraat 10	1221 GJ Hilversum, The Netherlands
GTSP Records	c/o Steve Callas Assoc., 12424 Wilshire Blvd., Ste. 1150	Los Angeles, CA 90025
HLB Productions	1057 31st Street South	Birmingham, AL 35205
Holden Productions	3800 Commerce St., #209	Dallas, TX 75226
Home Enterprises	3411 Silverside Road	Wilmington, DE 19810
Image Entertainment, Inc.	9933 Oso Avenue	Chatsworth, CA 91311
Integrity Global Marketing	4735 Belpar St. N.W.	Canton, OH 44718
Jay Ward Productions	8200 Sunset Blvd.	Los Angeles, CA 90046
JCS Entertainment II	4676 Admiralty Way, Ste. 300	Marina Del Rey, CA 90292
Kid Friendly Productions	2550 Cattleman Way	Paso Robles, CA 93446
Knight Scenes Incorporated	1333 H St. NW, West Tower, 10th Floor	Washington, D.C. 20005
LaFonda Partners	4401 Albert Circle	Lake Oswego, OR 97035
Les Distributions Rozon Inc./Just For Laughs	2101 St. Laurent Blvd.	Montreal (Quebec) Canada
Libra Films	[see Magus Entertainment]	
Lifetime Entertainment Services dba Lifetime Television	309 W. 49th St.	New York, NY 10019

Claimant	Address	City, State, Country
Link Television Entertainment	10339 Whipple Street	Toluca Lake, CA 91602
Lipscomb Entertainment	P.O. Box 291598	Los Angeles, CA 90029
Litton Syndications	2213 Middle St., 2nd Floor	Sullivan's Island, SC 29482
Magus Entertainment	Imperstraat 10, 1221 GJ Hilversum	The Netherlands
Mainframe Entertainment	710-1045 Howe St.	Vancouver, BC Canada V6Z 2A9
Mansfield Television Distribution Company	9291 Pikes Peak Way	Parker, CO 80138
Mark Anthony Entertainment	1375 Broadway, 21st Floor	New York, NY 10018
Mega Entertainment International	150 West 25th Street, # 503	New York, NY 10001
Minotaur International Ltd.	160 Great Portland St.	London W1N 5TB
Mom U.S.A. Inc.	[see Litton Syndications]	
Music & Media International	8756 Holloway Dr.	West Hollywood, CA 90069
Nabisco, Inc.	c/o Cokin Communications, 75 Washington Blvd.	Stamford, CT 06901
National Academy of Television Arts and Sciences	111 W. 57th Street	New York, NY 10019
New Dominion Pictures LLC	1000 Film Way	Suffok, VA 23434
New Visions Syndication, Inc.	P.O. Box 599	Aspen, CO 81611
NVC Arts	The Forum, 74-80 Camden St.	London NW1 0EG, UK
O. Atlas Enterprise, Inc. aka Atlas Enterprises	8383 Wilshire Blvd., Ste. 339	Los Angeles, CA 90211
Over the Edge-TV	401 Morris Avenue, Studio 1	Springfield, NJ 07081
Passport International Productions	10520 Magnolia Blvd.	North Hollywood, CA 91601
Planet Pictures	4764 Park Granada, Suite 208	Calabasas, CA 91302
Promark Television Inc.	323 S. Doherty Dr., #301	Los Angeles, CA 90048
Psychic Readers Network	c/o Klein, Zelman, et al., 485 Madison Ave.	New York, NY 10022
Quartet International, Inc.	20 Butternut Dr.	Pearl River, NY 10965

Claimant	Address	City, State, Country
Questar Video aka Questar, Inc.	680 North Lake Shore Dr., #900	Chicago, IL 60611
Raycom Sports	2315 Coliseum Center Drive, Ste. 200	Charlotte, NC 28217
Red Apple Entertainment Corporation	1 St. Clair Avenue West, Suite 503	Toronto, Ontario M4V 1K7
Reel Funds International, Inc. dba Reel Media International	4516 Lovers Lane, Suite 178	Dallas, TX 75225
Sandra Carter Productions	230 W. 79th St., #102	New York, NY 10024
Sarrazin Couture Entertainment	14 Duncan St., Suite 203	Toronto Ontario M5H 3G8 Canada
Scholastic Productions, Inc.	524 Broadway, 5th Floor	New York, NY
Scott Free Productions	9348 Civic Center Dr., Mezz Flr.	Beverly Hills, CA 90210
Showtime Television	10880 Wilshire Blvd., Suite 1600	Los Angeles, CA 90024
Splendid Film GmbH	Aisdorfer Strasse 3	D-50933 Kohn (Cologne) Germany
Sportsworld	6 Henrietta Street, Covent Garden	London WC2E 8PS UK
St. Jude-Children's Hospital	501 St. Jude's Place	Memphis, TN 38105
Streamline Pictures	8624 Wilshire Blvd.	Beverly Hills, CA 90211
Team Communications Group aka Team Entertainment Group	11618 Wilshire Blvd., 2nd Floor	Los Angeles, CA 90025
TearDrop Golf	8350 N. Le High	Morton Grove, IL 60053
Tepuy International	2745 Ponce de Leon Blvd.	Coral Gables, FL 33134
The City Productions Inc.	14 Duncan St., Suite 203	Toronto Ontario M5H 3G8 Canada
The Media Source	520 N. Highland Ave.	Upper Nyack, NY 10960
The Television Syndication Company, Inc.	501 Sabal Lake Drive, Ste. 105	Longwood, FL 32779
Thomas Horton Associates	408 Bryant Circle, Suite K	Ojai, CA 93023
Tide Entertainment	1120 Gator Trail	Palm Beach, FL 33409
Timberwolf Productions	8051 State Highway 34	Marble Hill, MO 63764
Today's Homeowner	1480 Cody Road South	Mobile, AL 36695

Claimant	Address	City, State, Country
Tremendous Entertainment	17113 Minnetoka Blvd.	Minnnetonka, MN 55345
TV Guide	2121 Ave of Americas, 4th Floor	New York, NY 10036
TV Matters	De Ruyterkade 142	1011 AC Amsterdam, Netherlands
TVD Productions	38 Fernwood	Montgomery, IL 60538
United Negro College Fund	8260 Willow Oaks Corporate Drive	Fairfax, VA 22031
United States Olympic Committee	One Olympic Plaza	Colorado Springs, CO 80909
Urban Latino TV, LLC	1 Astor Place, 5-S	New York, NY 10003
Video Tours Inc.	15 New Britain Avenue	Unionville, CT 06085
Vivavision Inc. fka Productions JBM Inc.	1973 Falardeau	Montreal (Quebec) H2K 2L9 Canada
Watercourse Road Productions LLC	100 N. Hope Ave., Ste. 18	Santa Barbara, CA 93110
West 175 Productions, Inc.	2203 Airport Way Street, Ste. 801	Seattle, WA 98134
Willie Wilson Productions, Inc.	P.O. Box 129	Matterson, IL 60443
Winchester Entertainment PLC	29/30 Kingly Street	London W1R 5LB
Worldwide Pants, Inc.	1697 Broadway	New York, NY 10019
Worldwide Subsidy Group, LLC	9903 Santa Monica Blvd., #655	Beverly Hills, CA 90212

# **EXHIBIT 60**

000623

CABLE CLAIM - - COPYRIGHT ARBITRATION ROYALTY PANEL

Independent Producers Group, an assumed name of Worldwide Subsidy Group, LLC, a Texas limited liability company, does hereby file, on behalf of itself and all other parties listed on the attached Exhibit A, a claim to compulsory license fees pursuant to 17 U.S.C. Section 111(d)(4)(A) and 37 C.F.R. Section 252.3 for secondary transmissions by cable systems during the period January 1, 2002 through December 31, 2002. All parties in whose names the claim herein is filed have duly authorized the above party to make this filing on their behalf. In compliance with 37 C.F.R. Section 252.3, said claimant hereby furnishes the following information:

1. The full name of the person or the entity filing claim to royalties, including, address, telephone/fax number: Independent Producers Group, an assumed name of Worldwide Subsidy Group, LLC, a Texas limited liability company, 9903 Santa Monica Blvd., #655, Beverly Hills, CA 90212, (310) 446-1768 (phone), (310) 372-1969 (fax)

2. The full legal name and address of the persons or entities entitled to claim the royalty fees: See attached Exhibit "A".

3. The nature of the copyrighted works whose secondary transmissions provide the basis of the claim is: TELEVISION PROGRAMS AND/OR WORKS INCLUDED IN SUCH PROGRAMMING OR TRANSMISSION

4. On the basis of information and belief, our copyrighted programs (i) "Feed The Children" and (ii) "Bob Vila's Home Again" were the subject of a primary transmission by television station (i) KCAL, Los Angeles, and (ii) KGO, San Francisco on (i) January 27, 2002, and (ii) January 14, 2002, and were retransmitted on a distant signal basis on those dates by cable systems known as (i) Mediacom California LLC, and, (ii) Falcon Cable System Co. II, L.P. which serve (i) Kern County, California, and (ii) South Lake Tahoe, California. The claimants of the foregoing programs are (i) Feed the Children, Inc., and (ii) BVTV, Inc.

Independent Producers Group,  
an assumed name of Worldwide Subsidy Group, LLC,  
a Texas limited liability company  
9903 Santa Monica Blvd., #655  
Beverly Hills, CA 90212

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GENERAL COUNSEL  
OF COPYRIGHT

By (signature): [Signature]  
Typed/Printed Name: Marian Oshita  
Title: President

Date: July 15, 2003

Independent Producers Group

Exhibit "A"

Claimant	Address	City, State, Country
Adler Media Inc.	6849 Old Dominion Dr., Ste. 360	McLean, VA 22101
Amity Film & Video Productions Ltd.	30 High Street, First Floor	Godalming, Surrey GU7 1DZ, U.K.
As Seen On TV	2444 Innovation Way	Rochester, NY 14624
Atlantic Film Corporation	Celtic House, Amberly Place	Windsor, Berks SL4 1TN
Atlantic Film Partners, c/o Wigmore Co.	88 Baker Street	London W1U 6TQ, U.K.
Beckmann International	Meadow Court, West Street	Ramsey, Isle of Man, IM8 1AE British Isles
Best Direct (International) Ltd.	167 Imperial Drive	Harrow, Middlesex HA2 7JP, U.K.
Big Feats Entertainment, L.P.	c/o HIT Entertainment, 830 South Greenville Avenue	Allen, TX 75002
Billy Graham Evangelistic Association	1300 Harmon Place	Minneapolis, MN 55403
Bob Ross, Inc.	P.O. Box 946	Sterling, VA 20167
Breakthrough Films & Television	122 Sherbourne Street	Toronto, Ontario, M5A 2R4 Canada
BVTV, Inc.	115 Kingston St., 3rd Floor	Boston, MA 02111
C21C Limited	[see Beckmann International]	
Cambium Film & Video Productions Ltd.	[see CCI Entertainment]	
Carol Reynolds Productions, Inc.	199 Bay Street, Ste. 5300	Toronto, Ontario, M5L 1B9 Canada
CCI Entertainment	18 Dupont St.	Toronto, Ontario, M5R 1V2 Canada
CCI Releasing	[see CCI Entertainment]	
Cinemaginaire Inc.	5144, boul. Saint-Laurent	Montreal, Quebec, Canada H2T1R8
Cinemavault Releasing Inc.	[see S Entertainment, Inc.]	
Cirque du Soleil Images Inc.	8400 2nd Avenue	Montreal, Quebec, Canada H1Z 4M6
Cogeco Radio-Television Inc.	3720 Boul. Industriel	Sherbrooke, Quebec, Canada J1L 1Z9
Computer Personalities Systems, Inc.	c/o Oberman, Rebmann, 1617 JFK Blvd.	Philadelphia, PA 19103
Devillier Donegan Enterprises, L.P.	4401 Connecticut Avenue, N.W.	Washington, D.C. 20008

\*

Claimant	Address	City, State, Country
Direct 2U Network, Inc.	c/o Oberman, Rebmann, 1617 JFK Blvd.	Philadelphia, PA 19103
Direct Cinema, Ltd.	P.O. Box 10003	Santa Monica, CA 90410
Dragon Tales Productions	[see Breakthrough Films]	
Ego Film Arts	80 Niagra Street	Toronto, Ontario, M5V 1C5 Canada
Electronic Publication Co., Ltd.	[see Beckmann International]	
Equestrian Vision	Horsham Road	Horsham, West Sussex RH13 8BP U.K.
Farm Journal Electronic Media Company	25 Executive Drive, Ste. A	Lafayette, IN 47905
Feed the Children, Inc.	P.O. Box 36	Oklahoma City, OK 73101
Firing Line	c/o National Review, 215 Lexington Avenue	New York, NY 10016
Florentine Films / Holt Productions, Inc.	20 Kingsley Ave.	Haydenville, MA 01039
Glittering Clowns Electronic Publ. Co. Ltd.	Estate Office, Exbury	Southampton SO45 1AZ, U.K.
Global Response LLC	708 South Third St., #108	Minneapolis, MN 85415
Great Plains National Instructional Library	1800 North 33rd St.	Lincoln, NE 68583
Hawthorne Direct, Inc.	300 N. 16th Street	Fairfield, Iowa 52556
Healthy TV, Inc.	[see IWV Media Group, Inc.]	
Imagex Ltd.	1190 Barrington St., 4th Floor	Halifax, Nova Scotia, Canada B3H 2R4
Inca	67 Castelnau, Barnes	London SW13 9RT U.K.
Inner World Video	[see IWV Media Group, Inc.]	
Instant Amoureux Inc.	[see Cinemaginaire Inc.]	
IWV Media Group, Inc.	6232 Hwy 146 North, Suite 600	Baytown, TX 77520
Jack Van Impe Ministries International	1718 Northfield Drive	Rochester Hills, MI 48309
Jefferson Pilot Sports	One Julian Price Place	Charlotte, NC 28208
K2 Media Group	5 Park Plaza	Irvine, CA 92614

Claimant	Address	City, State, Country
Kevin Spencer, Inc.	2740 B Queensview Drive	Ottawa, Ontario, Canada K2B 2A2
King Motion Picture Corporation	1702 Canada Trust Tower, 10104-103rd	Edmonton, Alberta, Canada T5J 0H8
Laura Cadieux Inc.	[see Cinemaginaire Inc.]	
Lawrence Welk Syndication	2700 Pennsylvania Avenue	Santa Monica, CA 90404
Le Confessional Inc.	[see Cinemaginaire Inc.]	
Le Pain Inc.	[see Cinemaginaire Inc.]	
Les Productions Videofilms Limitee	296, rue St-Paul ouest, Ste. 400	Montreal, Quebec, Canada H2Y 2A3
Life Outreach International	1801 W. Eulesse Blvd.	Eulesse, TX 76040
Light Duty Productions	[see IWW Media Group, Inc.]	
Little M Productions	[see Breakthrough Films]	
Lyons Partnership, L.P.	c/o HIT Entertainment, 830 South Greenville Avenue	Allen, TX 75002
Marty Stouffer Productions Ltd.	P.O. Box 5057	Aspen, CO 81612
Mentorn Barracough Carey Productions Ltd.	[see Mentorn Int'l Distr. Ltd.]	
Mentorn International Distribution Ltd.	43 Whitfield Street	London W1T 4HA, U.K.
Meredith Corporation	1716 Locust Street	Des Moines, IA 50309
Midwest Center for Stress & Anxiety, Inc.	106 N. Church St., #200	Oak Harbor, OH 43449
Montreal vu par Inc.	[see Cinemaginaire Inc.]	
Mr. Showbiz Productions	[see Breakthrough Films]	
Multimedia Group of Canada	261 du St-Sacrement St.	Montreal, Quebec, Canada H2Y 3V2
Nancy's Notions, Ltd.	333 Beicht Ave.	Beaver Dam, WI 53916
Network Programs International	3150 Ocana Avenue	Long Beach, CA 90808
Ontario Educational Communications Authority	Box 200, Station Q	Toronto, Ontario, M4T 2T1 Canada
Pacific Family Entertainment LLC	642 South B St., Ste. A	Tustin, CA 92780

Claimant	Address	City, State, Country
Paradigm Pictures Corporation	344 Dupont Street, Ste. 206	Toronto, Ontario, M5R 1V9 Canada
Paul Feldman	133 Whitehouse Ave., Boreham Wood	Herts WD6 1HB, U.K.
Peter Rodgers Organization	1800 N. Highland Ave., Ste. 100	Hollywood, CA 90028
Phil Slater Associates	32 Ash Street	Fleetwood, Lancashire, U.K.
PMT, Ltd.	785 Cressman Rd.	Harleysville, PA 19438
Popular History Company	[see Breakthrough Films]	
Production Le Jour Inc.	[see Cinemaginaire Inc.]	
Production Le Siege Inc.	[see Cinemaginaire Inc.]	
Productions Pixcom, Inc.	1720 rue du Canal	Montreal, Quebec, Canada H3K 3E6
Queen Light Productions	[see Breakthrough Films]	
Questar Video	680 North Lake Shore Dr., #900	Chicago, IL 60611
Reel Enlightenment	[see IWV Media Group, Inc.]	
Ron Hazelton Productions, Inc.	161 West 61st, Ste. 22F	New York, NY 10023
S Entertainment (1997) Inc.	[see S Entertainment, Inc.]	
S Entertainment Holdings Inc.	[see S Entertainment, Inc.]	
S Entertainment, Inc.	434 Queen Street East	Toronto, Ontario, M5A 1T5 Canada
Salem Baptist Church of Chicago, Inc.	11800 South Indiana Ave.	Chicago, IL 60628
Searchlight Entertainment	[see IWV Media Group, Inc.]	
SC Entertainment Holdings Inc.	[see S Entertainment, Inc.]	
SC Entertainment International Inc.	[see S Entertainment, Inc.]	
Shadow Lake Productions	[see Breakthrough Films]	
Simply Fishing, Inc.	1890 Center Street	Hugo, MI 55038
Slim Goodbody Corporation	Post Office Box 242	Lincolnton, ME 04850

\*

Independent Producers Group

Exhibit "A"

Claimant	Address	City, State, Country
Small World Productions, Inc.	120 Lakeside Ave., #210	Seattle, WA 98122
Sophistry Limited	3 Quayside Street	Edinburgh EH6 6EJ, U.K.
Sound Venture Productions Ottawa Ltd.	126 York Street, Ste. 219	Ottawa, Ontario, Canada K1N 5T5
Sullivan Entertainment International	110 Davenport Road	Toronto, Ontario, M5R 3R3 Canada
Tapestry International Ltd.	11 Hanover Square, 14th Floor	New York, NY 10005
The Friendly Kitchen Co.	[see Breakthrough Films]	
Twin Cities Public Television	[see Beckmann International]	
Venevision International	550 Biltmore Way, Ste. 900	Coral Gables, Florida 33134
Video/Media Distribution Inc.	1050 North State Street	Chicago, IL 60610
Westwind Pictures Ltd. (fka 591755 Saskatchewan Ltd.)	#402-2206 Dewdney Ave.	Regina, Saskatchewan, Canada S4R 1H3
Whamo Entertainment	1850 South Sepulveda Blvd., #201	Los Angeles, CA 90025
Whidbey Island Films, Inc.	3724 Vanlage Avenue	Studio City, CA 91604
World Events Productions	1 S. Memorial Drive, Ste. 2000	St. Louis, MO 63102
World Events Productions Ltd.	[see World Events Productions]	
World Wide Pictures	1300 Harmon Place	Minneapolis, MN 55403
Zebby's Zoo Production Inc.	4727 Mill Run Road	New Port Ritchy, FL 34653

# **EXHIBIT 61**

000547

From: <moshita@bigplanet.com>  
To: <cablecarp@loc.gov>  
Date: Mon, Aug 2, 2004 8:57 PM  
Subject: Cable Joint Claim from Worldwide Subsidy Group LLC

Joint Claim for Cable Retransmission Royalty Fees

In accordance with section 111 of the Copyright Act, 17 U.S.C., and Part 252 of the Copyright Office regulations, 37 CFR 252.1 et seq, the copyright owner claimant named herein files with the Copyright Office of the Library of Congress a claim to royalty payments collected from cable television systems retransmitting copyrighted programming contained on over-the-air television and radio broadcast signals. This joint claim to royalties is for fees collected from cable television systems during calendar year 2003.

Full name and address (including a specific number and street name or rural route) of the person or the entity filing the joint claim to royalties on behalf of copyright owners:

Worldwide Subsidy Group LLC

c/o Jeffrey C. Bogert  
815 Moraga Drive  
Los Angeles, CA 90049

Telephone number of person or entity filing the claim:

310-372-1970

Fax number, if any, of person or entity filing the claim:

310-372-1969

Email:

moshita@bigplanet.com

Contact Person:

Marian Oshita  
9903 Santa Monica Blvd., #655  
Beverly Hills, CA 90212  
310-372-1970 telephone  
310-372-1969 fax  
moshita@bigplanet.com

Statement of authorization for filing joint claim. The parties listed below have duly authorized the person or entity named herein to file this claim on their behalf. Full legal names and address of the copyright owners entitled to claim the joint royalty fees.:

SEE ATTACHMENT LIST

General statement of the nature of the copyright owners' works (examples: motion pictures, syndicated television series, sports broadcasts, music):

television programming, motion pictures, syndicated television series, sports broadcasts

The copyrighted broadcast program Cheaters, which is owned by Cheaters International was the subject of a primary transmission made by broadcast station KTLA, which is licensed to the city of Los Angeles,

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GENERAL COUNSEL  
OF COPYRIGHT

on December 21, 2003 and was retransmitted by cable system NPG Cable, Inc., which serves the community of Mammoth Lakes, CA

Claim submitted at 20:56 on 8/2/04. There is 1 attached file.

**Worldwide Subsidy Group**

Claimant	Address	City, State, Country
1st Miracle Pictures	3439 West Cahuenga Blvd.	Hollywood, CA 90068
3DD Entertainment	190 Camden High Street	London NW1 8QP
A&E Television Network	235 E. 45th	New York, NY 10017
Abrams Gentile Entertainment	244 W. 54th St., 9th Floor	New York, NY 10019
Academy of Television Arts and Sciences	5220 Lankershim Blvd.	North Hollywood, CA
ACME Communications, Inc.	10829 Olive Blvd., Suite 202	St. Louis, MO 63141
Adams Golf	2801 East Plano Parkway	Plano, TX 75074
Advantage Media Group	4298 Bright Bay Way	Ellicott City, MD 21042
American Film Institute (AFI)	2021 North Western Ave.	Los Angeles, CA 90027
American Film Investment Corporation dba Golden Films Entertainment	2400 Sand Hill Road, Suite 201	Menlo Park, CA 94025
Anheuser-Busch Companies, Inc.	One Busch Place	St. Louis, MO 63118
Ardent Productions	The Old Stables, Bagshot Park	Bagshot, Surrey GU19 5PJ
Artist and Idea Management, Ltd.	1 Astor Place, 5-S	New York, NY 10003
AVA Productions B.V.	J. Muyskenweg, 22	NL-1096 CJ Amsterdam
Aviva International LLC	850 Old Country Road, 2nd Floor	Belmont, CA 94002
BBC Worldwide Americas, Inc.	747 3rd Avenue, 6th Floor	New York, NY 10017
Beacon Communications Corp.	120 Broadway, Suite 200	Santa Monica, CA 90401
* Benny Hinn Ministries	c/o Brewer, et al., 1702 E. Tyler, Suite 1	Harlingen, TX 78550
Big Events Company	CSI House, 177-187 Arthur Road	London SW198AE UK
BKS Entertainment	250 West 54th St., Suite 807	New York, NY 10019

# 547

**Worldwide Subsidiary Group**

Claimant	Address	City, State, Country
C/F International, Inc.	Box 4, 2550 Willow Lane	Thousand Oaks, CA 91361
Cappy Productions	118 East 57th Street	New York, NY 10022
Central City Productions	401 N. Wabash Ave., Suite 608	Chicago, IL 60611-5647
Cheaters International	4516 Lovers Lane, Box 104	Dallas, TX 75225
Chesler/Perlmutter Productions	129 Yorkville Ave., Suite 200	Toronto, Ont. M5R 1C4
Computer Personalities Systems, Inc.	c/o Oberman, Rebmann, 1617 JFK Blvd.	Philadelphia, PA 19103
Conus Communications	3415 University Avenue	St. Paul/Minneapolis, MN 55414
Corday Productions	c/o Goldman & Kagan, 1801 Century Park East, #2222	Los Angeles, CA 90067
Cosgrove-Meurer Productions	4303 W. Verdugo	Burbank, CA 91505
* Creflo A. Dollar Ministries	c/o Brewer, et al., 1702 E. Tyler, Suite 1	Hartlingen, TX 78550
Cromwell Productions	Suite 11, Central Chambers, Cooks Alley	Strafford-Upon-Avon, CV37 6QN
Daniel Hernandez Productions	397 Bay Shore Avenue	Long Beach, CA 90803
David Finch Distribution Ltd. fka David Finch Associates	P.O. Box 264, Walton-on-Thames	Surrey KT12 3YR England
Direct 2U, Inc.	c/o Oberman, Rebmann, 1617 JFK Blvd.	Philadelphia, PA 19103
Distraction Formats	35, rue Washington	75008 Paris FRANCE
Eagle Mountain Int'l Church (Kenneth Copeland Ministries)	c/o Brewer, et al., 1702 E. Tyler, Suite 1	Hartlingen, TX 78550
Eagle Rock Entertainment	22 Armoury Way	Wandsworth, London U.K. SW18 1EZ
Entertainment Rights PLC fka SKD Media (Sleepy Kid Co. Ltd.) ESPN	31 St. Petersburg Place	London W2 4LA
Fédération Internationale de Football Association	605 Third Ave., 11th Floor FIFA House, 11 Hiltzigug, 8030	NY, NY 10158-0180 Zurich, Switzerland

\*

**Worldwide Subsidiary Group**

<b>Claimant</b>	<b>Address</b>	<b>City, State, Country</b>
Filmline International 1999 Inc.	410 St-Nicolas Street, Suite 10	Montreal Qc. Canada H2Y 2P5
Films By Jove	11325 Sunshine Terrace	Studio City, CA 91604
Fishing University, LLC	290 Leatherwood Drive	Winchester, TN 37398
Five Star Productions aka 5 Star Productions	430 S. Congress Avenue	Delray Beach, FL 33445
Flesh and Blood Inc.	14 Duncan St., Suite 203	Toronto Ontario M5H 3G8 Canada
Flying Tomato Films	11755 Victory Blvd., Suite 103	North Hollywood, CA 91606
France Animation	14, Rue Alexander Parodi	75010 Paris
Freewheelin' Films, Ltd.	Box 599	Aspen, CO 81612
Funimation	6851 N.E. Loop 820, Suite 247	Ft. Worth, TX 76180
Gabriel Communications	c/o Serling Rooks & Ferrara LLP	254 West 54th, 14th Floor
Golden Films Finance Corporation dba Golden Films Entertainment	2400 Sand Hill Road, Suite 201	Menlo Park, CA 94025
Gorky Studios	[see Magus]	
Grandolph Juravic Entertainment, LLC	R.F.D. 1680 Bordeaux	Long Grove, IL 60047
Greenlight International B.V.	Amperestraat 10	1221 GJ Hilversum, The Netherlands
GTSP Records	c/o Steve Callas Assoc., 12424 Wilshire Blvd., Suite 1150	Los Angeles, CA 90025
Healthy TV, Inc.	[see IWV Media Group, Inc.]	
HLB Productions	1057 31st Street South	Birmingham, AL 35205
Home Enterprises	407 Philadelphia Pike	Wilmington, DE 19809
Image Entertainment, Inc.	8933 Oso Avenue	Chatsworth, CA 91311
Satsuki Ina	2716 X Street	Sacramento, CA 91518

**Worldwide Subsidiary Group**

Claimant	Address	City, State, Country
Inner World Video	[see IWV Media Group, Inc.]	Canton, OH 44718
Integrity Global Marketing	4735 Belpar St. N.W.	Baytown, TX 77520
IWV Media Group, Inc.	6232 Hwy 146 North, Suite 600	Los Angeles, CA 90046
Jay Ward Productions	8200 Sunset Blvd.	Marina Del Rey, CA 90292
JCS Entertainment II	4676 Admiralty Way, Suite 300	Paso Robles, CA 93446
Kid Friendly Productions	2550 Cattleman Way	Washington, D.C. 20005
Knight Scenes Incorporated	1333 H St. NW, West Tower, 10th Floor	Lake Oswego, OR 97035
LaFonda Partners	4401 Albert Circle	Montréal, QC H2X 2T5 Canada
Les Distribution Rozon Inc./Just For Laughs	2101 Boul. St-Laurent	New York, NY 10019
Lifetime Entertainment Services dba Lifetime Television	309 W. 49th St.	
Light Duty Productions	[see IWV Media Group, Inc.]	
Link Television Entertainment	10339 Whipple Street	Toluca Lake, CA 91602
Lipscomb Entertainment	P.O. Box 291598	Los Angeles, CA 90029
Litton Syndications	2213 Middle St., 2nd Floor	Sullivan's Island, SC 29482
Magus Entertainment	mperestraat 10, 1221 GJ Hilversum	The Netherlands
Mainframe Entertainment	710-1045 Howe St.	Vancouver, BC Canada V6Z 2A9
Mansfield Television Distribution Company	9291 Pikes Peak Way	Parker, CO 80138
Mark Anthony Entertainment	1375 Broadway, 21st Floor	New York, NY 10018
Mega Entertainment International	150 West 25th Street, # 503	New York, NY 10001
Minotaur International Ltd.	160 Great Portland St.	London W1N 5TB
MoneyTV.Net Inc.	251 Jeanell Drive, #3	Carson City, NV 89703

Worldwide Subsidiary Group

Claimant	Address	City, State, Country
Nabisco, Inc.	c/o Cokin Communications, 75 Washington Blvd.	Stamford, CT 06901
National Academy of Television Arts and Sciences	111 W. 57th Street	New York, NY 10019
Nelson Davis Television Productions	2809 2nd Street, Suite 2	Santa Monica, CA 90405
New Dominion Pictures LLC	1000 Film Way	Suffok, VA 23434
New Visions Syndication, Inc.	P.O. Box 599	Aspen, CO 81611
NVC Arts	The Forum, 74-80 Camden St.	London NW1 0EG, UK
O. Atlas Enterprise, Inc. aka Atlas Enterprises	8383 Wilshire Blvd., Suite 339	Los Angeles, CA 90211
Over the Edge-TV	401 Morris Avenue, Studio 1	Springfield, NJ 07081
Passport International Productions	10520 Magnolia Blvd.	North Hollywood, CA 91601
Planet Pictures	4764 Park Granada, Suite 208	Calabasas, CA 91302
Dr. DW Portee	11243 So. Vermont Avenue	Los Angeles, CA 90044
Practical Sportsman Foundation	14097 Webster Rd., PO Box 1001	Bath, MI 48808
Promark Television Inc.	323 S. Doherty Dr., #301	Los Angeles, CA 90048
Psychic Readers Network	c/o Klein, Zelman, et al., 485 Madison Ave	New York, NY 10022
Quartet International	20 Butternut Dr.	Pearl River, NY 10965
Questar Video aka Questar, Inc.	680 North Lake Shore Dr., #900	Chicago, IL 60611
Raycom Sports	2315 Coliseum Center Drive, Ste. 200	Charlotte, NC 28217
Red Apple Entertainment Corporation	1 St. Clair Avenue West, Suite 503	Toronto, Ontario M4V 1K7
Reel Enlightenment	[see IWV Media Group, Inc.]	
Reel Funds International, Inc. dba Reel Media International	4516 Lovers Lane, Suite 178	Dallas, TX 75225

**Worldwide Subsidy Group**

Claimant	Address	City, State, Country
Sandra Carter Productions	230 W. 79th St., #102	New York, NY 10024
Searchlight Entertainment	[see IWV Media Group, Inc.]	
Scott Free Productions	9348 Civic Center Dr., Mezz Flr.	Beverly Hills, CA 90210
Showtime Television	10880 Wilshire Blvd., Suite 1600	Los Angeles, CA 90024
Southside Christian Palace Community Church	11243 So. Vermont Avenue	Los Angeles, CA 90044
Splendid Film GmbH	Alsdorfer Strasse 3	D-50933 Koln (Cologne) Germany
Sportsworld	6 Henrietta Street; Covent Garden	London WC2E 8PS UK
Streamline Pictures	8624 Wilshire Blvd.	Beverly Hills, CA 90211
Team Communications Group aka Team Entertainment Group	11818 Wilshire Blvd., 2nd Floor	Los Angeles, CA 90025
TearDrop Golf	8350 N. Le High	Morton Grove, IL 60053
Tepuy International	2745 Ponce de Leon Blvd.	Coral Gables, FL 33134
The City Productions Inc.	14 Duncan St., Suite 203	Toronto Ontario M5H 3G8 Canada
The Media Source	520 N. Highland Ave.	Upper Nyack, NY 10960
The Television Syndication Company, Inc.	501 Sabal Lake Drive, Suite 105	Longwood, FL 32779
Thomas Horton Associates	408 Bryant Circle, Suite K	Ojai, CA 93023
Tide Entertainment	1120 Gator Trail	Palm Beach, FL 33409
Timberwolf Productions	8051 State Highway 34	Marble Hill, MO 63764
Today's Homeowner	1480 Cody Road South	Mobile, AL 36695
TV Guide	2121 Ave of Americas, 4th Floor	New York, NY 10036
TV Matters	De Ruyterkade 142	1011 AC Amsterdam, Netherlands

Worldwide Subsidiary Group

Claimant	Address	City, State, Country
TVD Productions	38 Fernwood	Montgomery, IL 60538
United Negro College Fund	8260 Willow Oaks Corporate Drive	Fairfax, VA 22031
United States Olympic Committee	One Olympic Plaza	Colorado Springs, CO 80909
Urban Latino TV, LLC	1 Astor Place, 5-S	New York, NY 10003
Video Tours Inc.	15 New Britain Avenue	Unionville, CT 06085
Vivavision Inc. fka Productions JBM Inc.	1973 Falardeau	Montreal (Quebec) H2K 2L9 Canada
Watercourse Road Productions LLC	100 N. Hope Ave., Ste. 18	Santa Barbara, CA 98105
West 175 Enterprises, Inc.	1959 N.W., Sock Pl., #3	Seattle, WA 98107
* Willie Wilson Productions, Inc.	P.O. Box 129	Matterson, IL 60443
Winchester Entertainment PLC	29/30 Kingly Street	London W1R 5LB
Worldwide Subsidiary Group (fka Artist Collections Group LLC)	9903 Santa Monica Blvd., #655	Beverly Hills, CA 90212
W.R. Portee Evangelistic World Outreach, Inc./The W. R. Portee Word Healing Ministry	11243 So. Vermont Avenue	Los Angeles, CA 90044

# **EXHIBIT 62**

CABLE CLAIM - - COPYRIGHT ARBITRATION ROYALTY PANEL

**Independent Producers Group**, an assumed name of Worldwide Subsidy Group, LLC, a Texas limited liability company, does hereby file, on behalf of itself and all other parties listed on the attached Exhibit "A", a claim to compulsory license fees pursuant to 17 U.S.C. Section 111(d)(4)(A) and 37 C.F.R. Section 252.3 for secondary transmissions by cable systems during the period January 1, 2003 through December 31, 2003. All parties in whose names the claim herein is filed have duly authorized the above party to make this filing on their behalf. In compliance with 37 C.F.R. Section 252.3, said claimant hereby furnishes the following information:

1. The full name of the person or the entity filing claim to royalties, including, address, telephone/fax number: **Independent Producers Group**, an assumed name of Worldwide Subsidy Group, LLC, a Texas limited liability company, c/o Jeffrey C. Bogert, 815 Moraga Drive, Los Angeles, CA 90049, (310) 372-1970 (phone), (310) 372-1969 (fax)

2. The full legal name and address of the persons or entities entitled to claim the royalty fees: See attached Exhibit "A".

3. The nature of the copyrighted works whose secondary transmissions provide the basis of the claim is: TELEVISION PROGRAMS AND/OR WORKS INCLUDED IN SUCH PROGRAMMING OR TRANSMISSION

4. On the basis of information and belief, our copyrighted programs (i) "Feed The Children" and (ii) "Bob Vila's Home Again" were the subject of a primary transmission by television station (i) KCAL, Los Angeles, and (ii) KGO, San Francisco on (i) December 21, 2003, and (ii) December 6, 2003, and were retransmitted on a distant signal basis on those dates by cable systems known as (i) Mediacom California LLC, and, (ii) Comcast of Northern California I, Inc. which serve (i) Kern County, California, and (ii) Yuba City, California. The claimants of the foregoing programs are (i) Feed the Children, Inc., and (ii) BTVV, Inc.

**Independent Producers Group**,  
an assumed name of Worldwide Subsidy Group, LLC,  
a Texas limited liability company  
9903 Santa Monica Blvd., #655  
Beverly Hills, CA 90212

By (signature): [Signature]  
Typed/Printed Name: Marian Oshita  
Title: President

Date: July 15, 2004

us Postmark  
8/2/04 JF

Independent Producers Group

Claimant	Address	City, State, Country
Amity Film & Video Productions Ltd.	30 High Street, First Floor	Godalming, Surrey GU7 1DZ, U.K.
As Seen On TV	2444 Innovation Way	Rochester, NY 14624
Atlantic Film Corporation	Celtic House, Amberly Place	Windsor, Berks SL4 1TN
Atlantic Film Partners, c/o Wigmore Co.	88 Baker Street	London W1U 6TQ, U.K.
Beckmann International	Meadow Court, West Street	Ramsey, Isle of Man, 1M8 1AE British Isles
Best Direct (International) Ltd.	167 Imperial Drive	Harrow, Middlesex HA2 7JP, U.K.
Big Feats Entertainment, L.P.	c/o HIT Entertainment, 830 South Greenville Avenue	Allen, TX 75002
* Billy Graham Evangelistic Association	1300 Harmon Place	Minneapolis, MN 55403
Bob Ross, Inc.	P.O. Box 946	Sterling, VA 20167
Breakthrough Films & Television	122 Sherbourne Street	Toronto, Ontario, M5A 2R4 Canada
BVTV, Inc.	115 Kingston St., 3rd Floor	Boston, MA 02111
C21C Limited	[see Beckmann International]	
Cambium Entertainment Corporation	18 Dupont St.	Toronto, Ontario, M5R 1V2 Canada
Cambium Film & Video Productions Ltd.	[see CCI Entertainment]	
Carol Reynolds Productions, Inc.	189 Bay Street, Suite 5300	Toronto, Ontario, M5L 1B9 Canada
CCI Entertainment	18 Dupont St.	Toronto, Ontario, M5R 1V2 Canada
CCI Releasing	[see CCI Entertainment]	
Cinemaginaire Inc.	5144, boul. Saint-Laurent	
Cinemavault Releasing Inc.	[see S Entertainment, Inc.]	
Cirque du Soleil Images Inc.	8400 2nd Avenue	Montreal, Quebec, Canada H2T1R8
Cogeco Radio-Television Inc.	3720 Boul. Industriel	Montreal, Quebec, Canada H1Z 4M6
		Sherbrooke, Quebec, Canada J1L 1Z9

#549

Independent Producers Group

Claimant	Address	City, State, Country
Computer Personalities Systems, Inc.	c/o Oberman, Rebmann, 1617 JFK Blvd.	Philadelphia, PA 19103
Devillier Donegan Enterprises, L.P.	4401 Connecticut Avenue, N.W.	Washington, D.C. 20008
Direct 2U Network, Inc.	c/o Oberman, Rebmann, 1617 JFK Blvd.	Philadelphia, PA 19103
Direct Cinema, Ltd.	P.O. Box 10003	Santa Monica, CA 90410
Dragon Tales Productions	[see Breakthrough Films]	
Ego Film Arts	80 Niagra Street	Toronto, Ontario, M5V 1C5 Canada
Electronic Publication Co., Ltd.	[see Beckmann International]	
Equestrian Vision	Horsham Road	Horsham, West Sussex RH13 8BP U.K.
Farm Journal Electronic Media Company	25 Executive Drive, Suite A	Lafayette, IN 47905
Feed the Children, Inc.	P.O. Box 36	Oklahoma City, OK 73101
Firing Line	c/o National Review, 215 Lexington Avenue	New York, NY 10016
Florentine Films / Hott Productions, Inc.	20 Kingsley Ave.	Haydenville, MA 01039
Glittering Clowns Electronic Publication Co. Ltd.	Estate Office, Exbury	Southampton SO45 1AZ, U.K.
Global Response LLC	708 South Third St., #108	Minneapolis, MN 55415
Great Plains National Instructional Library	1800 North 33rd St.	Lincoln, NE 68583
Hawthorne Direct, Inc.	300 N. 16th Street	Fairfield, Iowa 52556
Imagex Ltd.	1190 Barrington St., 4th Floor	Halifax, Nova Scotia, Canada B3H 2R4
Inca	67 Casteinau, Barnes	London SW13 9RT U.K.
Instant Amoureux Inc.	[see Cinemaginaire Inc.]	
* Jack Van Impe Ministries International	1718 Northfield Drive	Rochester Hills, MI 48309
Jefferson Pilot Sports	One Julian Price Place	Charlotte, NC 28208

Independent Producers Group

Claimant	Address	City, State, Country
K2 Media Group	5 Park Plaza	Irvine, CA 92614
Kevin Spencer, Inc.	2740 B Queensview Drive	Ottawa, Ontario, Canada K2B 2A2
King Motion Picture Corporation	1702 Canada Trust Tower, 10104-103rd	Edmonton, Alberta, Canada T5J 0H8
Laura Cadieux Inc.	[see Cinemaginaire Inc.]	
Lawrence Welk Syndication	2700 Pennsylvania Avenue	Santa Monica, CA 90404
Le Confessional Inc.	[see Cinemaginaire Inc.]	
Le Pain Inc.	[see Cinemaginaire Inc.]	
Les Productions Videofilms Limitee	296, rue St-Paul ouest, Suite 400	Montreal, Quebec, Canada H2Y 2A3
Life Outreach International	1801 W. Eules Blvd.	Eules, TX 76040
Little M Productions	[see Breakthrough Films]	
Lyons Partnership, L.P.	[see Breakthrough Films]	
Mentorn Barracough Carey Productions Ltd.	c/o HIT Entertainment, 830 South Greenville Avenue	Allen, TX 75002
Mentorn International Distribution Ltd.	[see Mentorn International Distribution Ltd.]	
Meredith Corporation	43 Whitfield Street	London W1T 4HA, U.K.
Midwest Center for Stress & Anxiety, Inc.	1716 Locust Street	Des Moines, IA 50309
Montreal vu par Inc.	106 N. Church St., #200	Oak Harbor, OH 43449
Mr. Showbiz Productions	[see Cinemaginaire Inc.]	
Multimedia Group of Canada	[see Breakthrough Films]	
Nancy's Notions, Ltd.	261 du St-Sacrement St.	Montreal, Quebec, Canada H2Y 3V2
Network Programs International	333 Beichl Ave.	Beaver Dam, WI 53916
Ontario Educational Communications Authority	3150 Ocana Avenue	Long Beach, CA 90808
	Box 200, Station Q	Toronto, Ontario, M4T 2T1 Canada

Independent Producers Group

Claimant	Address	City, State, Country
Pacific Family Entertainment LLC	642 South B St., Suite A	Tustin, CA 92780
Paradigm Pictures Corporation	344 Dupont Street, Suite 206	Toronto, Ontario, M5R 1V9 Canada
Paul Feidman	133 Whitehouse Ave., Boreham Wood	Herts WD6 1HB, U.K.
Peter Rodgers Organization	1800 N. Highland Ave., Suite 100	Hollywood, CA 90028
Phil Slater Associates	32 Ash Street	Fleetwood, Lancashire, U.K.
PMT, Ltd.	785 Cressman Rd.	Harleysville, PA 19438
Popular History Company	[see Breakthrough Films]	
Production Le Jour Inc.	[see Cinemaginaire Inc.]	
Production Le Siege Inc.	[see Cinemaginaire Inc.]	
Productions Pixcom, Inc.	[see Cinemaginaire Inc.]	
Queen Light Productions	1720 rue du Canal	Montreal, Quebec, Canada H3K 3E6
RCN Television S.A.	[see Breakthrough Films]	
Ron Hazelton Productions, Inc.	Avenida de las Americas	
S Entertainment (1997) Inc.	161 West 61st, Suite 22F	No 65-82 Bogota
S Entertainment Holdings Inc.	[see S Entertainment, Inc.]	New York, NY 10023
S Entertainment, Inc.	[see S Entertainment, Inc.]	
SC Entertainment Holdings Inc.	434 Queen Street East	Toronto, Ontario, M5A 1T5 Canada
SC Entertainment International Inc.	[see S Entertainment, Inc.]	
Shadow Lake Productions	[see S Entertainment, Inc.]	
Simply Fishing, Inc.	[see Breakthrough Films]	
Small World Productions, Inc.	1890 Center Street	Hugo, MI 55038
	120 Lakeside Ave., #210	Seattle, WA 98122

Independent Producers Group

Claimant	Address	City, State, Country
Sophistry Limited	3 Quayside Street	Edinburgh EH6 6EJ, U.K.
Sound Venture Productions Ottawa Ltd.	126 York Street, Suite 219	Ottawa, Ontario, Canada K1N 5T5
Sullivan Entertainment International	110 Davenport Road	Toronto, Ontario, M5R 3R3 Canada
Tapestry International Ltd.	11 Hanover Square, 14th Floor	New York, NY 10005
The Friendly Kitchen Co.	[see Breakthrough Films]	
Twin Cities Public Television	[see Beckmann International]	
Venevision International	550 Biltmore Way, Suite 900	Coral Gables, Florida 33134
Video/Media Distribution Inc.	1050 North State Street	Chicago, IL 60610
Westwind Pictures Ltd. (fka 591755 Saskatchewan Ltd.)	#402-2206 Dewdney Ave.	Regina, Saskatchewan, Canada S4R 1H3
Whamo Entertainment	1850 South Sepulveda Blvd., #201	Los Angeles, CA 90025
Whidbey Island Films, Inc.	3724 Vantage Avenue	Studio City, CA 91604
World Events Productions	1 S. Memorial Drive, Suite 2000	St. Louis, MO 63102
World Events Productions Ltd.	[see World Events Productions]	
World Wide Pictures	1300 Harmon Place	Minneapolis, MN 55403

# **EXHIBIT 63**

IPG-represented Ministries - Devotional  
 2000-2003 Cable Distribution proceedings (Phase II)

	WSG- prepared July Claim	Executed Contract	Cite	Provided Response to Catalogue Request or Broadcast Verification	Cite	Comment
<b>Devotional</b>						
1 Benny Hinn Ministries	2000	x	1001	x	1083	
	2001	x	1001	x		
	2002	x	1001	x		
	2003	x	1001	x		
2 Billy Graham Evangelistic Association	2001	x	1004	x	1063, 1070, 1095, 1105	
	2002	x	1079	x	1063, 1070, 1095, 1105	
	2003	x	1080	x	1063, 1070, 1095, 1105	
3 Creflo A. Dollar Ministries	2000	x	1006	x	1071, 1086, 1107	
	2001	x	1006	x	1071, 1086, 1107	
	2002	x	1006	x	1071, 1086, 1107	
	2003	x	1006	x	1071, 1086, 1107	
4 Jack Van Impe Ministries International	2001	x	1010	x	1057, 1066, 1072, 1089, 1109	
	2002			x	1057, 1066, 1072, 1089, 1109	MO added to July claim, and Van Impe confirmed broadcasts.
	2003			x	1057, 1066, 1072, 1089, 1109	" " "
Eagle Mountain International Church aka Kenneth Copeland Ministries	2000	x	1011	x	1068, 1073, 1091, 1099	
	2001	x	1011	x	1068, 1073, 1091, 1099	
	2002	x	1011	x	1068, 1073, 1091, 1099	
	2003	x	1011	x	1068, 1073, 1091, 1099	
6 Life Outreach International	2000	x	1077	x	1060, 1074	
	2001	x	1078	x	1060, 1074	
	2002	x	1078	x	1060, 1074	
	2003	x	1078	x	1060, 1074	
7 Salem Baptist Church of Chicago, Inc.	2001	x	1015	x	1075	



# **EXHIBIT 64**

2000-2003 TITLES - ROYALTY GENERA -w- Distributor Information - Devotional

PROGRAM TITLES	PHASE I CATEGORY	ADVERSE CLAIMANT	WSG CLAIMANT per WSG CLAIMANT	WSG CLAIMANT per WSG CLAIMANT	RESTRICTIONS
American Religious Town Hall	Devotional	American Religious Town Hall, Inc.			2000-2001 only
1 Cubed	Devotional	Christian Broadcasting Network, Inc.			2003 only
Christian World News	Devotional	Christian Broadcasting Network, Inc.			2001-2002 only
Living the Life	Devotional	Christian Broadcasting Network, Inc.			2001-2003 only
One Cubed	Devotional	Christian Broadcasting Network, Inc.			2003 only
700 Club	Devotional	Christian Broadcasting Network, Inc.			
The 700 Club	Devotional	Christian Broadcasting Network, Inc.			
Coral Ridge	Devotional	Christian Broadcasting Network, Inc.			
Coral Ridge Ministries: Jesus Never Born	Devotional	Coral Ridge Ministries			
Dr. D. James Kennedy	Devotional	Coral Ridge Ministries			
Dr. James Kennedy	Devotional	Coral Ridge Ministries			
James Kennedy	Devotional	Coral Ridge Ministries			
Scrooge and Marley	Devotional	Coral Ridge Ministries			2002 only
Who Is This Jesus?	Devotional	Coral Ridge Ministries			
Coral Ridge Hour	Devotional	Coral Ridge Ministries			
Coral Ridge Ministries	Devotional	Coral Ridge Ministries Media, Inc.			
Coral Ridge Ministry	Devotional	Coral Ridge Ministries Media, Inc.			
The Coral Ridge Hour	Devotional	Coral Ridge Ministries Media, Inc.			
Answers With Bayless Conley	Devotional	Coral Ridge Ministries Media, Inc.			
Christmas Eve Candlelight Service From the Crystal Cathedral	Devotional	Cottonwood Christian Center			
Crystal Cathedral Christmas Eve Service Live	Devotional	Crystal Cathedral Ministries			
Crystal Cathedral Christmas Live	Devotional	Crystal Cathedral Ministries			
Hour of Power Christmas	Devotional	Crystal Cathedral Ministries			
Hour of Power Christmas Special	Devotional	Crystal Cathedral Ministries			
Christmas Eve at the Crystal Cathedral	Devotional	Crystal Cathedral Ministries, Inc.			
Christmas Eve Service From Crystal Cathedral	Devotional	Crystal Cathedral Ministries, Inc.			

2000-2003 TITLES - ROYALTY GENERAL -w- Distributor Information - Devotional

Crystal Cathedral Christmas Eve Service	Devotional	Crystal Cathedral Ministries, Inc.			
Hour of Power	Devotional	Crystal Cathedral Ministries, Inc.			
Jimmy Swaggart	Devotional	Family Worship Center Church, Inc.			2001 only
Jimmy Swaggart Ministries	Devotional	Family Worship Center Church, Inc.			2001 only
Jimmy Swaggart Telecast	Devotional	Family Worship Center Church, Inc.			2001 only
Jimmy Swaggart Weekly	Devotional	Family Worship Center Church, Inc.			2001 only
En Contacto	Devotional	In Touch Ministries			only 2000-2001, 2003
In Touch Ministry	Devotional	In Touch Ministries			only 2000-2001, 2003
In Touch	Devotional	In Touch Ministries, Inc.			only 2000-2001, 2003
In Touch Ministries	Devotional	In Touch Ministries, Inc.			only 2000-2001, 2003
In Touch With Dr. Charles Stanley	Devotional	In Touch Ministries, Inc.			only 2000-2001, 2003
It Is Written	Devotional	It is Written			
Joyce Meyer Weekly	Devotional	Joyce Meyer Ministries fka Life In the Word, Inc.			
Life in the Word	Devotional	Joyce Meyer Ministries fka Life In the Word, Inc.			
Old Time Gospel Hour	Devotional	Liberty Broadcasting Network			only 2002-2003
Make Your Day Count	Devotional	Oral Roberts Evangelical Association			only 2000-2001
Miracles Now	Devotional	Oral Roberts Evangelical Association			only 2001
The Hour of Healing	Devotional	Oral Roberts Evangelical Association			only 2000-2001
Day of Discovery	Devotional	RBC Ministries			only 2001-2003
Dr. Reginald Cherry	Devotional	Reginald B. Cherry Ministries			only 2003
Reginald Cherry	Devotional	Reginald B. Cherry Ministries			only 2003
The Doctor and the Word	Devotional	Reginald B. Cherry Ministries			only 2003
Kenneth Hagin Jr.	Devotional	Rhema Bible Church			only 2000, 2003
Rhema Praise	Devotional	Rhema Bible Church			only 2000, 2003
Ron Phillips	Devotional	Ron Phillips Ministries			
Central Baptist Church	Devotional	Ron Phillips Ministries			
The Central Message	Devotional	Ron Phillips Ministries			
Exalted Word	Devotional	Speak the Word Church International			

2000-2003 TITLES - ROYALTY GENERAL -w- Distributor Information - Devotional

Randy Morrison	Devotional	Speak the Word Church International			
Speak the Word	Devotional	Speak the Word Church International			
The Exalted Word	Devotional	Speak the Word Church International			
T.D. Jakes	Devotional	The Potter's House of Dallas, Inc.			
The Potter's House	Devotional	The Potter's House of Dallas, Inc.			
Zola Levitt	Devotional	Zola Levitt Ministries, Inc.			only 2000, 2003
Zola Levitt Presents	Devotional	Zola Levitt Ministries, Inc.			only 2000, 2003
Amazing Facts	Devotional				
Jerusalem	Devotional			A&E Television / Billy Graham Evangelistic Association	A & E all, Billy Graham 2001-2003
The Homecoming	Devotional			BBC Worldwide / Billy Graham Evangelistic Association	BBC all, Billy Graham 2001-2003
Benny Hinn	Devotional			Benny Hinn Ministries	
Benny Hinn Daily	Devotional			Benny Hinn Ministries	
DaySpring Visitation With Benny Hinn	Devotional			Benny Hinn Ministries	
This Is Your Day	Devotional			Benny Hinn Ministries	
Billy Graham	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003
Billy Graham Classic Crusades	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003
Billy Graham Crusade	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003
Billy Graham Crusade: Guess Who's Coming	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003
Billy Graham Ministries	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003
Billy Graham Special	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003
Billy Graham Youth Special	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003
Caught	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003

2000-2003 TITLES - ROYALTY GENERAL -w- Distributor Information - Devotional

For Pete's Sake	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003
No Longer Alone	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003
One Nation Under God	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003
Power Play	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003
Repeat Performance	Devotional			Billy Graham Evangelistic Association	Billy Graham 2001-2003
Something to Sing About	Devotional			Billy Graham Evangelistic Association / Reel Media International	Billy Graham 2001-2003, Reel all
Changing Your World	Devotional			Creflo A. Dollar Ministries	
Creflo A. Dollar Jr.	Devotional			Creflo A. Dollar Ministries	
Creflo Dollar	Devotional			Creflo A. Dollar Ministries	
Creflo Dollar Live	Devotional			Creflo Dollar Ministries	
Creflo Dollar Ministries	Devotional			Creflo Dollar Ministries	
Dr. Jack Van Impe	Devotional			Jack Van Impe Ministries	JVI 2001-2003
Jack Van Impe	Devotional			Jack Van Impe Ministries	JVI 2001-2003
Jack Van Impe Presents	Devotional			Jack Van Impe Ministries	JVI 2001-2003
Believer's Voice of Victory	Devotional			Kenneth Copeland Ministries	
Kenneth Copeland	Devotional			Kenneth Copeland Ministries	
Kenneth Copeland's Believer's Convention	Devotional			Kenneth Copeland Ministries	
James Robeson	Devotional			Life Outreach International	
James Robinson	Devotional			Life Outreach International	

2000-2003 TITLES - ROYALTY GENERATION -w- Distributor Information - Devotional

James Robison Africa	Devotional				Life Outreach International	
James Robison: Sudan	Devotional				Life Outreach International	
Life Outreach	Devotional				Life Outreach International	
Life Today	Devotional				Life Outreach International	
Life Today With James Robison	Devotional				Life Outreach International	
Mission Feeding	Devotional				Life Outreach International	
James T. Meeks	Devotional				Salem Baptist Church of Chicago, Inc.	Salem 2001-2002 only
New Salem Baptist Church	Devotional				Salem Baptist Church of Chicago, Inc.	Salem 2001-2002 only
New Salem Church	Devotional				Salem Baptist Church of Chicago, Inc.	Salem 2001-2002 only
Reverend Meeks	Devotional				Salem Baptist Church of Chicago, Inc.	Salem 2001-2002 only
Salem Baptist	Devotional				Salem Baptist Church of Chicago, Inc.	Salem 2001-2002 only
Salem Baptist Church	Devotional				Salem Baptist Church of Chicago, Inc.	Salem 2001-2002 only
Salem Baptist Church of Chicago, Inc.	Devotional				Salem Baptist Church of Chicago, Inc.	Salem 2001-2002 only
Salem Church	Devotional				Salem Baptist Church of Chicago, Inc.	Salem 2001-2002 only
Bishop W.R. Portee: Frontiers of the Mind	Devotional				W.R. Portee Word Healing Ministry	W.R. 2003 only
Evangelistic Outreach	Devotional				W.R. Portee Word Healing Ministry	W.R. 2003 only

# **EXHIBIT 65**

Rec'd 1-2  
D-14 P.O.

FILED  
LOS ANGELES SUPERIOR COURT

JAN 26 2005

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR COUNTY OF LOS ANGELES, CENTRAL DISTRICT

LISA KATONA GALAZ, an	)	CASE NO. BC 297015
individual,	)	
	)	PLAINTIFF'S JUDGMENT ON
Plaintiff,	)	JURY VERDICT
	)	
v.	)	
	)	
MARIAN OSHITA, an individual;	)	
WORLDWIDE SUBSIDY GROUP, LLC a	)	
Texas Limited Liability	)	
Company, dba INDEPENDENT	)	
PRODUCERS GROUP, WORLDWIDE	)	
SUBSIDY GROUP, LLC a California)	)	
Limited Liability Company,	)	
formerly named ARTIST	)	
COLLECTIONS GROUP, LLC, and	)	
DOES 1 through 10, inclusive,	)	
	)	
Defendants.	)	

This action came on regularly for trial on December 6, 2004, in Department 14 of the Superior Court, the Hon. Alan Buckner Judge Presiding; the plaintiff appearing by attorney Brian D. Boydston, Esq. defendant MARIAN OSHITA appearing by attorney Michael Harris, Esq., and defendants WORLDWIDE SUBSIDY GROUP, LLC a Texas Limited Liability Company, dba INDEPENDENT PRODUCERS GROUP, WORLDWIDE SUBSIDY GROUP, LLC

1 a California Limited Liability Company, formerly named ARTIST  
2 COLLECTIONS GROUP, LLC appearing by attorney Jeffrey Bogert, Esq. A  
3 jury of twelve persons and two alternates was regularly impaneled and  
4 sworn. Witnesses were sworn and testified. After hearing the  
5 evidence and arguments of counsel, the jury was duly instructed by the  
6 Court and the cause was submitted to the jury with directions to  
7 return a verdict on special issues. The jury deliberated and  
8 thereafter returned into court with its verdict as follows:

9  
10  
11 We answer the questions submitted to us as follows:

12  
13 (1) Did Marian Oshita represent to Raul Galaz that \$50,000 was  
14 then owed to her for unreimbursed expenses?

15  
16 \_\_\_\_\_ Yes \_\_\_\_\_ No

17  
18 Answer: Yes

19  
20 If your answer to question 1 is yes, then answer question 2. If  
21 you answered no, go to Question 8.

22  
23 (2) Was Marian Oshita's representation false?

24  
25 \_\_\_\_\_ Yes \_\_\_\_\_ No

26  
27 Answer: Yes

1 If your answer to question 2 is yes, then answer question 3. If  
2 you answered no, go to Question 8.

3  
4 (3) Did Marian Oshita know that this representation was false  
5 when she made it, or that she made the representation recklessly and  
6 without regard for its truth?

7  
8 \_\_\_\_\_ Yes \_\_\_\_\_ No

9  
10 Answer: Yes

11  
12 If your answer to question 3 is yes, then answer question 4. If  
13 you answered no, go to Question 8.

14  
15 (4) Did Marian Oshita intend that Raul Galaz rely on the  
16 representation?

17  
18 \_\_\_\_\_ Yes \_\_\_\_\_ No

19  
20 Answer: Yes

21  
22 If your answer to question 4 is yes, then answer question 5. If  
23 you answered no, go to Question 8.

24  
25 (5) Did Raul Galaz reasonably rely on Marian Oshita's  
26 representation?

27  
28 \_\_\_\_\_ Yes \_\_\_\_\_ No

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Answer: No

If your answer to question 5 is yes, then answer question 6. If you answered no, go to Question 8.

(6) Was Raul Galaz harmed as a result?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Answer: No answer

If your answer to question 6 is yes, then answer question 7. If you answered no, go to Question 8.

(7) Was Raul Galaz' reliance on Marian Oshita's representation a substantial factor in causing Raul Galaz to enter into the Rights Purchase Agreement?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Answer: No answer

Go to the next Question.

(8) Did Marian Oshita breach her fiduciary duties by failing to provide Lisa Katona Galaz with, or allow Lisa Katona Galaz to inspect, any of the following:

(a) Current lists of business and residence addresses of

1 each member of the companies;

2 (b) Copies of the companies' articles of organization and  
3 all amendments thereto;

4 (c) Copies of all the companies' tax returns, if any, for  
5 the last six years;

6 (d) Copies of the companies' financial statements, if any,  
7 for the last six years; and

8 (e) The books and records of the companies as they relate  
9 to the internal affairs of the companies for the current and last four  
10 years.

11

12 \_\_\_\_\_ Yes \_\_\_\_\_ No

13

14 Answer: Yes

15

16 If your answer to question 8 is yes, then answer question 9. If  
17 you answered no and your answer to any of Questions 1 through 7 was  
18 no, go to Question 10. If you answered no and your answer to Question  
19 7 was yes, have the presiding juror sign and date this form.

20

21 (9) What damages, if any, do you award Lisa Galaz for Marian  
22 Oshita's breach of fiduciary duties: \$ \_\_\_\_\_.

23

24 Answer: \$18,750

25

26 If your answer to any of Questions 1 through 7 was no go to  
27 Question 10. If your answer to Question 7 was yes, have the presiding  
28 juror sign and date this form.

1 (10) Do you find that both Marian Oshita and Raul Galaz consented  
2 to the transfer of Raul Galaz' membership interest, as opposed to  
3 merely an economic interest, in Worldwide Subsidy Group-Texas to Lisa  
4 Galaz?

5  
6 \_\_\_\_\_ Yes \_\_\_\_\_ No

7  
8 Answer: Yes

9  
10 Go to the next question.

11  
12 (11) Do you find that both Lisa Galaz and Raul Galaz consented  
13 to the transfer of Raul Galaz' membership interest, as opposed to  
14 merely an economic interest, in Worldwide Subsidy Group-Texas to  
15 Marian Oshita?

16  
17 \_\_\_\_\_ Yes \_\_\_\_\_ No

18  
19 Answer: No

20  
21 Got to Question 12.

22  
23 (12) Do you find that Raul Galaz consented to the transfer of  
24 Raul Galaz' membership interest, as opposed to merely an economic  
25 interest, in Worldwide Subsidy Group-California to Lisa Galaz?

26  
27 \_\_\_\_\_ Yes \_\_\_\_\_ No

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Answer: Yes

If your answer to Question 12 is yes, go to Question 13. If your answer is no, have the presiding juror sign and date this form.

(13) Do you find that Lisa Galaz consented to the transfer of Raul Galaz' membership interest, as opposed to merely an economic interest, in Worldwide Subsidy Group-California to Marian Oshita?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Answer: No

The presiding juror must now sign and date this form.

Dated: 12/17/04 /s/Michael L. Taylor, Presiding Juror

The jury was polled and answered in agreement with the verdict as read.

It appearing by reason of said verdict that the plaintiff LISA KATONA GALAZ is entitled to a judgment against the defendant MARIAN OSHITA,

NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED BY THIS COURT as follows:

(1) that the sale from plaintiff, LISA KATONA GALAZ's assignor, Raul Galaz, to defendant MARIAN OSHITA, of a 37.5% interest in WORLDWIDE SUBSIDY GROUP, LLC a Texas Limited Liability Company, dba INDEPENDENT PRODUCERS GROUP, and a 37.5% interest in WORLDWIDE SUBSIDY

1 GROUP, LLC a California Limited Liability Company, formerly named  
2 ARTIST COLLECTIONS GROUP, LLC, is hereby rescinded;

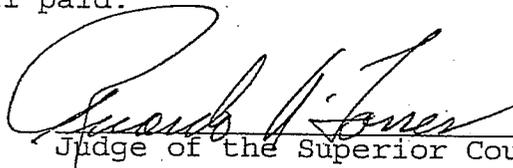
3 (2) that by virtue of such rescission, from the date of entry  
4 of this judgment, plaintiff, LISA KATONA GALAZ, is the owner of a 75%  
5 economic and membership interest in WORLDWIDE SUBSIDY GROUP, LLC a  
6 Texas Limited Liability Company, dba INDEPENDENT PRODUCERS GROUP, and  
7 a 75% economic and membership interest in WORLDWIDE SUBSIDY GROUP, LLC  
8 a California Limited Liability Company, formerly named ARTIST  
9 COLLECTIONS GROUP, LLC;

10 (3) that the books of WORLDWIDE SUBSIDY GROUP, LLC a Texas  
11 Limited Liability Company, dba INDEPENDENT PRODUCERS GROUP, and  
12 WORLDWIDE SUBSIDY GROUP, LLC a California Limited Liability Company,  
13 formerly named ARTIST COLLECTIONS GROUP, LLC be adjusted to reflect  
14 that on May 14, 2002, Mr. Galaz received a draw of \$50,000; and

15 (4) that plaintiff, LISA KATONA GALAZ, have and recover from  
16 said defendant, MARIAN OSHITA, the sum of \$18,750, with interest  
17 thereon at the rate of ten percent (10%) per annum from the date of  
18 entry of this judgment until paid.

19 DATED:

20 Jan 26, 2005

21   
22 Judge of the Superior Court

# **EXHIBIT 66**

Rept

ORIGINAL FILED

MAY 17 2006

LOS ANGELES SUPERIOR COURT

1 PICK & BOYDSTON, LLP  
Brian D. Boydston (State Bar No. 155614)  
2 523 West Sixth Street, Suite 1134  
Los Angeles, CA 90014  
3 Telephone (213) 624-1996  
Facsimile (213) 624-9073  
4 Attorneys for Plaintiff LISA KATONA GALAZ

5  
6  
7  
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR COUNTY OF LOS ANGELES, CENTRAL DISTRICT

11 LISA KATONA GALAZ, an ) CASE NO. BC 297015  
12 individual, )  
13 Plaintiff, ) AMENDED ORDER COMPELLING  
14 v. ) TRANSFER OF ALL LIMITED  
15 ) LIABILITY COMPANY  
16 ) DOCUMENTS, A STATEMENT OF  
MARIAN OSHITA, an individual; ) ALL LIMITED LIABILITY  
17 ) COMPANY MONIES AND  
WORLDWIDE SUBSIDY GROUP, LLC a ) ACCOUNTS PAYABLE, AND OF  
18 ) ALL LIMITED LIABILITY  
Texas Limited Liability ) COMPANY MONIES TO  
19 ) PLAINTIFF [~~PROPOSED~~]  
Company, dba INDEPENDENT )  
20 PRODUCERS GROUP, WORLDWIDE )  
SUBSIDY GROUP, LLC a California )  
21 Limited Liability Company, ) Original Hearing Date:  
formerly named ARTIST ) May 6, 2005  
22 )  
COLLECTIONS GROUP, LLC, and ) Hearing Date:  
23 ) April 14, 2006  
DOES 1 through 10, inclusive, ) Time: 9:00 a.m.  
24 ) Dept.: 316  
25 Defendants. ) Judge: Torres, Ricardo A.  
26  
27  
28

RECEIVED  
APR 26 2006

Dept. 316

23 / / /  
24 / / /  
25 / / /  
26 / / /  
27 / / /

9/17

1 Plaintiff LISA KATONA GALAZ's Application For Order Compelling  
2 Transfer of All Limited Liability Company Documents, of a Statement  
3 of All Limited Liability Company Monies and Accounts Payable, and of  
4 All Limited Liability Company Monies to Plaintiff came on for hearing  
5 at 9:00 a.m. on May 6, 2005 in Department 316 of this Court.

6 Upon a showing of good cause therefor, and in satisfaction of CRC  
7 379, IT WAS HEREBY ORDERED THAT:

8 Defendant MARIAN OSHITA shall, by May 23, 2005, transfer to  
9 Plaintiff's counsel:

10 (1) All documents relating to WORLDWIDE SUBSIDY GROUP, LLC a  
11 Texas Limited Liability Company, dba INDEPENDENT PRODUCERS GROUP, and  
12 WORLDWIDE SUBSIDY GROUP, LLC, a California Limited Liability Company,  
13 formerly named ARTIST COLLECTIONS GROUP, LLC (hereinafter, the  
14 "LLCs");

15 (2) A statement of the LLCs' monies and accounts payable; and

16 (3) An accounting of the LLCs' monies.

17 Based on Plaintiff's Application for Order Compelling Transfer  
18 to Plaintiff of All Limited Liability Company Documents, Information,  
19 Accounts Payable, and Monies Owed and oral argument permitted at the  
20 hearing of Plaintiff's Application at 9:00 a.m. on April 14, 2006  
21 before the Court sitting in Department 316, this Court finds good  
22 cause to amend its Order of May 6, 2005 to now read as follows:

23 Defendant MARIAN OSHITA shall transfer to Plaintiff's counsel:

24 (1) All documents relating to the LLCs;

25 (2) A statement of the LLCs' monies and accounts payable; and

26 (3) An accounting of the LLCs' monies.

27 / / /

28

1 It is further Ordered that Defendant MARIAN OSHITA is enjoined  
2 from depositing or transacting, or causing to be deposited or  
3 transacted, any checks or other monies payable to the LLCs, and is  
4 also enjoined from representing to any and all third parties that  
5 MARIAN OSHITA is entitled to receive any checks or other monies on  
6 behalf of, or for, the LLCs.

7  
8 IT IS SO ORDERED

9  
10 DATED: ~~April~~ <sup>2006</sup>  
~~17~~ <sup>MAY 17</sup> 2006

**RICARDO A. TORRES**  
\_\_\_\_\_  
JUDGE OF THE SUPERIOR COURT

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the County of Los Angeles, State of California, I am over the age of 18  
4 years and not a party to the within entitled action; my business address is: 523 West Sixth Street,  
Suite 1134, Los Angeles, California 90014.

5 On April 26, 2006, I served the foregoing document(s) described as:

6 **AMENDED ORDER COMPELLING TRANSFER OF ALL LIMITED LIABILITY  
7 COMPANY DOCUMENTS, A STATEMENT OF ALL LIMITED LIABILITY COMPANY  
8 MONIES AND ACCOUNTS PAYABLE, AND OF ALL LIMITED LIABILITY  
COMPANY MONIES TO PLAINTIFF [PROPOSED]**

9 on the interested parties in said action:

10  By placing  the original  a true copy thereof enclosed in a sealed  
envelope addressed as follows:

11 Michael Harris, Esq.  
12 Rogers & Harris  
13 9200 Sunset Boulevard, Suite 404  
Los Angeles, California 90069-3506  
14 Facsimile: (310) 271-3649  
Attorney for Defendant MARIAN OSHITA

15  **(BY MAIL)** I deposited such envelope in the mail at Los Angeles, California. The  
16 envelope was mailed with postage thereon fully prepaid. I am readily familiar with  
17 the firm's practice of collection and processing correspondence for mailing. It is  
deposited with the U.S. Postal Service on that same day in the ordinary course of  
business. I am aware that on motion of the party served, service is presumed invalid  
if the postal cancellation date or the postage meter date is more than one day after the  
date of deposit for mailing affidavit.

18  **(BY FEDERAL EXPRESS)** I delivered to a person authorized by Federal Express  
19 to receive documents, in an envelope or package designated by Federal Express with  
20 delivery fees paid or provided for, addressed to the person on who it is served, at the  
office address as last given by that person on any document filed in the cause and  
served on that party making service; or at that party's place of residence.

21  **(BY PERSONAL SERVICE)** I delivered such envelope by hand to the office or  
residence of the addressee.

22  **(BY FACSIMILE)** I faxed such document from Los Angeles, California to the  
23 facsimile number(s) shown on the attached Service List. The sending facsimile  
machine number is (213) 624-9073. The transmission was reported as complete and  
without error and the transmission report was properly issued by the transmitting  
facsimile machine.

24  **(STATE)** I declare under penalty of perjury under the laws of the State of California  
that the foregoing is true and correct.

25  **(FEDERAL)** I declare that I am employed in the office of a member of the bar of  
26 this Court at whose direction the service was made.

27 Executed on April 26, 2006, at Los Angeles, California

28 Betty Keys  
Betty Keys

1  
2 **PROOF OF SERVICE**

3 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

4 I am employed in the County of Los Angeles, State of California, I am over the age of 18 years and not a party to  
the within entitled action; my business address is 523 West Sixth Street, Suite 1134, Los Angeles, CA 90014

5 On May 18, 2006 I served the foregoing documents(s) described as: **A COPY OF THE ORDER COMPELLING**  
6 **TRANSFER OF ALL LIABILITY COMPANY DOCUMENTS, A STATEMENT OF ALL LIMITED LIABILITY**  
7 **COMPANY MONIES AND ACCOUNTS PAYABLE, AND OF ALL LIMITED LIABILITY COMPANY MONIES**  
8 **TO PLAINTIFF, SIGNED BY JUDGE RICARDO A. TORRES OF THE SUPERIOR COURT, DEPARTMENT**  
9 **316**

10  By placing  the original  a true copy thereof enclosed in a sealed envelope addressed as follows:

11 **Michael Harris, Esq.**  
12 **ROGERS & HARRIS**  
13 **9200 Sunset Boulevard, Suite 404**  
14 **Los Angeles, CA 90069-3506**  
15 **Fax: (310) 271-3649**

16  **(BY MAIL)** I deposited such envelope in the mail at Los Angeles,  
17 California. The envelope was mailed with postage thereon fully prepaid.  
18 I am readily familiar with the firm's practice of collection and  
19 processing correspondence for mailing. It is deposited with the U.S.  
20 Postal Service on that same day in the ordinary course of business. I  
21 am aware that on motion of party served, service is presumed invalid  
22 if postal cancellation date or postage meter date is more than one day  
23 after date of deposit for mailing affidavit.

24  **(BY FEDERAL EXPRESS)** I delivered to an authorized driver by Federal  
25 Express to receive documents, in an envelope or package designated by  
26 Federal Express with delivery fees paid or provided for, addressed to  
27 the person on who it is served, at the office address as last given by  
28 that person on any document filed in the cause and served on that party  
making service; or at that party's place of residence.

**(BY PERSONAL SERVICE)**  
I delivered such envelope(s) by hand to the office(s) of the  
addressee(s).

**(BY FACSIMILE)** I faxed such document from Los Angeles, California  
to the facsimile number(s) shown on the attached service list. The  
sending facsimile machine number is (213)624-9073. The transmission was  
reported as complete and without error and the transmission report was  
properly issued by the transmitting facsimile machine.

**(STATE)** I declare under penalty of perjury under the laws of the State  
of California, that the foregoing is true and correct.

**(FEDERAL)** I declare that I am employed in the office of a member of the bar of this court at whose  
direction the service was made.

Executed on May 18, 2006, at Los Angeles, California.

*Betty Keys*  
Betty Keys

# **EXHIBIT 67**



## Independent Producers Group

## IPG Distribution Methodology

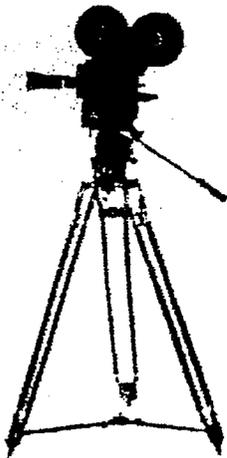
Programs Entitled 1999 Retransmission Royalties
How It Works Retransmission Royalties
IPG Distribution Methodology
How To Become A Member
Who Is Entitled Owner or Distributor?
About Independent Producers Group
News Events Status of Distributions
Additional Monies That You May Not Be Collecting
Contact Us

### ALL RETRANSMITTED PROGRAMS SHOULD BE COMPENSATED!

Historically, only the largest owners of programming have applied for and collected cable and satellite retransmission royalties. Consequently, these owners have advocated the distribution of such monies only to programs broadcast on select television stations during certain hours of the day. Given the significant costs involved in the distribution proceedings, these and other biases have gone *unchallenged* until the advent of Independent Producers Group.

Each and every program that is retransmitted generates a portion of the cable and satellite fees collected by the U.S. Copyright Office, therefore each and every retransmitted program should be compensated, *not just programs appearing on certain television stations during certain parts of the day*. IPG therefore examines a significantly greater number of broadcasts than any other party - in excess of 50% more -- and compensates program owners according to IPG's examination of this vastly greater number of broadcasts.

IPG's method of distribution is based on a factoring of multiple elements - (i) examination of broadcasts appearing on television stations generating the greatest amount of retransmission royalties and with the greatest number of retransmission subscribers, (ii) the time placement of each individual broadcast and anticipated viewership during such time placement, and (iii) the length of the examined broadcast.



#### Selection of Television Stations

#### Review of All Logged Broadcasts

#### Implementation of a Station Weight Factor

#### Implementation of a Time Period Weight Factor

#### Summation of Broadcast Lengths, Adjusted by the Station Weight Factor and the Time Period Weight Factor, In Order to Create the Sum Weighted Value

#### Distribution of Monies Received

## THEORY OF IPG DISTRIBUTION METHODOLOGY

One of the primary criteria for awarding royalties in retransmission proceedings is the value of carriage and programming to a cable system operator and satellite carrier. IPG recognizes the common sense fact that cable system operators and satellite carriers cannot predict the viewer ratings that will subsequently result for all programs appearing on the television stations that they elect to retransmit. That is, the value or appeal of any particular television station program cannot be based on ratings that will occur only after a television station has been elected to be carried.

IPG contends that it is the overall appeal of the television station to reach niches within a subscriber base that affects whether a retransmitter will carry such station, and that the overall appeal is reflected by the number of retransmitters that elect to carry a particular television station. The overall appeal may be quantified by the number of subscribers to such cable and satellite systems, and the retransmission fees attributable to any television station.

Furthermore, because a retransmitter is obligated to carry the entirety of a terrestrial signal, and the most evident assessment of a program's market value is the broadcast station's decision as to when and how often to telecast the program, the relative value of each program broadcast must be based on placement of the program in a particular time period and the frequency of its telecast.

IPG's distribution methodology thereby focuses on the foregoing factors, distributing retransmission royalties according to placement of a value on each individual broadcast based on the overall appeal of each retransmitted television station, and the time placement, frequency and length of such broadcasts.

## MECHANICS OF IPG DISTRIBUTION METHODOLOGY

### **(i) Selection of Television Stations.**

Hundreds of television stations are retransmitted by cable system operators and satellite carriers. Nevertheless, most of these stations were retransmitted to relatively insignificant numbers of subscribers or generated relatively insignificant fees from their retransmission. Although all shows appearing on all retransmitted stations are entitled to be compensated, the expenses associated with a comprehensive valuation is cost prohibitive and cost inefficient. Despite this fact, IPG has included within its distribution methodology all programming appearing on over 100 cable-retransmitted television stations and all non-de minimus satellite-retransmitted television stations (the "Sample Stations"), with more television stations to be added for the broadcast years 2000 and beyond.

The Sample Stations included within IPG's distribution methodology are selected according to the blended average rank of the television stations, based on the number of distant subscribers that received the retransmitted television signals and the revenues generated to the Copyright Office that are attributable to the retransmitted signals. IPG purchases information reflecting both the number of distant retransmission subscribers and the amount of distant retransmission fees generated by hundreds of U.S.-based television stations, constructs a blended average rank of such stations, then obtains the broadcast data for the highest ranking stations, i.e., the Sample Stations. Due to the requirement that only "distant" retransmissions be compensated, IPG only considers data as it relates to distant signal retransmissions. For purposes of its ranking and selection of television stations, IPG examines all types of cable systems, not just the largest systems (which are owned by entities that are sister to the largest program owner companies).

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**(ii) Review of All Logged Broadcasts**

Upon identifying the Sample Stations, IPG reviews the lists of all programs broadcast on the Sample Stations, 24 hours a day, for the entire broadcast year. Such data exceeds 1.2 Million logged broadcasts, and entails a wide range of information for each broadcast (e.g., date, time, station, program title, director, actors, etc.).

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**(iii) Implementation of a Station Weight Factor**

IPG thereafter utilizes a factor (the Station Weight Factor) in order to weigh the relative significance of any given station, and the broadcast of any program appearing on such station. Such Station Weight Factor was derived from the concept that the relative significance of any given station should be affected by both (i) the number of distant subscribers that could potentially view such station, and (ii) the amount of distant retransmission fees generated by such station. Given the formulas that exist for cable system operators and satellite carriers to calculate retransmission fees, a particular station might generate a relatively greater percentage of the collected fees (as compared to other stations) than the percentage of potential subscribers attributable to such station, or vice-versa.

IPG sums (i) the figure representing the percentage of Sample Stations subscribers that receive the given station, and (ii) the figure representing the percentage of fees generated by the Sample Stations. This summed figure is thereafter divided in half, and is identified as the

Weighted Average % of Subscribers and Fees (hereafter, the Station Weight Factor) for each of the Sample Stations. For cable retransmission purposes, the Station Weight Factor is derived from the subscribers and fees that exist for Form 1, Form 2 and Form 3 cable systems.

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**(iv) Implementation of a Time Period Weight Factor**

Recognizing that a cable system operator or satellite carrier is obligated to carry the entirety of a terrestrial signal, and that the appeal of any given program within the group of programs appearing on the terrestrial station will vary, IPG adjusts the value of each logged broadcast based on the value of the time period of broadcast. More specifically, IPG utilizes a factor (the Time Period Weight Factor) based on the of anticipated viewership of all persons during time period dayparts, in order to weigh the relative significance of any given broadcast.

The Time Period Weight Factor is derived from data published by Nielsen Media Research, reflecting the weekly viewing habits of all persons. Weekly viewing is assessed in terms of the number of television hours viewed during the week, according to the amount of viewing attributable to specific time periods, allowing allocation amongst such time periods. After engaging in such allocation on an hour-by-hour basis, IPG determines the Average Minutes Viewed Per Hour In Viewing Period (i.e., the Time Period Weight Factor) in order to apply such Time Period Weight Factor against each and every logged broadcast appearing on the Sample Stations, and according to the period during which such logged broadcast appears.

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**(v) Summation of Broadcast Lengths, Adjusted by the Station Weight Factor and the Time Period Weight Factor, In Order to Create the Sum Weighted Value.**

As a final step, the Station Weight Factor and the Time Period Weight Factor are applied against the broadcast length of all compensable broadcasts appearing on the Sample Stations. IPG sums the resulting value for all IPG-represented programs appearing on the Sample Stations in order to create a "Sum Weighted Value", which is applied against the Sum Weighted Value of all non-IPG programs for which claims have been made. The resulting percentage serves as the basis of IPG's claim to the available pool of cable and satellite royalties to be distributed by the Copyright Office.

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**(vi) Distribution of Monies Received**

After distribution of monies from the Copyright Office, the Sum Weighted Value applied to any given program is the basis of IPG's distribution to parties that control such IPG-represented programs. Distribution of monies received from the Copyright Office is subject to a fifteen percent reduction to IPG, and pro rata reduction of expenses incurred by IPG relating to prosecution of the cable and satellite royalty claims. All distributions shall occur promptly following distribution from the Copyright Office and third party verification of each claimant's entitlement.

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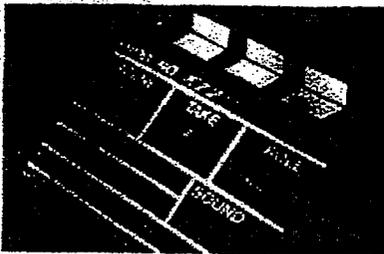
**Copyright 2000 Independent Producers Group**



## Independent Producers Group

### How To Become A Member

Programs Entitled 1999 Retransmission Royalties
How It Works Retransmission Royalties
IPG Distribution Methodology
How To Become A Member
Who Is Entitled Owner or Distributor?
About Independent Producers Group
News Events Status of Distributions
Additional Monies That You May Not Be Collecting
Contact Us



Independent Producers Group invites your company at this time to become part of the coalition representing itself before the U.S. Copyright Office and CARP. Such coalition already includes the catalogues of such notable producers as A&E Television, the British Broadcasting Corporation (BBC), the Academy of Television Arts and Sciences, and numerous others.

No payments are made to IPG for its services. IPG incurs all costs associated with the prosecution of the coalition members claims, deducting expenses from the distributed royalties at such time as the royalties are distributed. Each coalition member therefore incurs only a pro rata share of the expenses incurred by the IPG and a fifteen percent commission in order to assure that IPG will be capable of prosecuting the rights of independent producers in future proceedings.

If your company wishes to join the Independent Producers Group coalition, you may elect to have IPG add your company name to a general application made on behalf of multiple IPG-represented claimants. In order to elect this alternative, have an authorized signatory of your company execute the attached Mandate Agreement, and return it to Independent Producers Group as soon as possible. IPG will countersign the document and return a copy to you for your files. **The next filing deadline is July 31, 2000.** In order to avoid the possibility of a missed filing, please print out the Mandate Agreement, and forward the executed Mandate Agreement both by fax [send to (210) 490-9779] and by mail [send originals to the address of IPG noted above].

IPG must be notified of your desire for IPG representation no later than Monday, July 31, 2000, at 2:00 p.m. If you are having difficulty obtaining the requisite signature by the deadline above, then CALL US. IPG can always withdraw an application on your behalf, it cannot revive a deadline.

**If you have any questions about the foregoing, please feel free to contact our office.**

(print the mandate agreement)

MANDATE AGREEMENT

The undersigned claimant hereby grants and assigns Independent Producers Group (IPG) the exclusive right to apply for and collect on behalf of the undersigned all monies distributed by the United States Copyright Office and the Copyright Arbitration Royalty Panel (CARP) attributable to 1999 cable and satellite retransmission royalties distributed pursuant to 17 U.S.C. Sections 111 and 119, under the following terms and conditions:

1. The undersigned agrees to accept the distribution methodology published at the IPG web site [www.independentproducers.org](http://www.independentproducers.org), hereby incorporated by reference.
2. Promptly upon IPG's request therefor, the undersigned shall provide IPG with an alphabetical list of program titles owned or distributed by the undersigned for which the undersigned retains the right to collect cable and satellite retransmission royalties.
3. IPG shall be entitled to establish all necessary and reasonable procedures required in order to accurately distribute retransmission royalties to the appropriate claimants.
4. IPG, its officers, agents or employees shall not be liable to the undersigned or to any person, firm or corporation for any act or omission in the prosecution of undersigned's claims.
5. The undersigned warrants that to the best of undersigned's knowledge, the undersigned retains the exclusive right to apply for and collect cable and satellite retransmission royalties, as applicable, for the program titles provided by the undersigned to IPG.
6. In the event that the undersigned and another party make claim to the same program title, IPG will have no obligation to resolve such dispute, and shall be entitled to escrow funds attributable to the disputed program title until IPG is provided notification from the competing claimants of their resolution of such dispute, or until IPG is provided a ruling from a court of competent jurisdiction.
7. Any interpretation of this Agreement shall be governed by California law, subject to the exclusive personal and subject matter jurisdiction of state and federal courts located in Los Angeles County, California.
8. The undersigned agrees to provide IPG all documentation necessary to substantiate the undersigned's right to collect retransmission royalties for program titles submitted by the undersigned. All program title claims made by the undersigned shall be subject to IPG's good faith confirmation of the undersigned's entitlement thereto.

AGREED AND ACCEPTED:  
CLAIMANT

By: \_\_\_\_\_

Typed/Printed Name: \_\_\_\_\_

INDEPENDENT PRODUCERS  
GROUP

By: \_\_\_\_\_

An Authorized Signatory

Title: \_\_\_\_\_

Date: \_\_\_\_\_

(print the mandate agreement)

**Copyright 2000 Independent Producers Group**



# Independent Producers Group

## Who Is Entitled? Owner or Distributor

<a href="#">Programs Entitled 1999 Retransmission Royalties</a>
<a href="#">How It Works Retransmission Royalties</a>
<a href="#">IPG Distribution Methodology</a>
<a href="#">How To Become A Member</a>
<a href="#">Who Is Entitled Owner or Distributor?</a>
<a href="#">About Independent Producers Group</a>
<a href="#">News Events Status of Distributions</a>
<a href="#">Additional Monies That You May Not Be Collecting</a>
<a href="#">Contact Us</a>

It is the "owner of copyright" that is entitled to apply for and receive cable and satellite retransmission royalties attributable to a program title. However, because a copyright owner can convey all or a part of its copyright to third parties via contract, the right to apply for and collect cable/satellite retransmission royalties can be conveyed to a distributor, agent, etc.

It is clear that the right to collect these ancillary revenues resides with the copyright owner unless granted to a third party. If a copyright owner enters into an agreement that could possibly address these rights, it is ultimately the intent of the parties that governs whether a grant of these ancillary rights has occurred. A simple grant of "distribution" rights or "broadcast" rights does not generally satisfy the requirements set forth by governmental agencies for a party to be entitled to claim the ancillary revenues.

Copyright 2000 Independent Producers Group



## Independent Producers Group

About Independent Producers Group

<a href="#">Programs Entitled 1999 Retransmission Royalties</a>
<a href="#">How It Works Retransmission Royalties</a>
<a href="#">IPG Distribution Methodology</a>
<a href="#">How To Become A Member</a>
<a href="#">Who Is Entitled Owner or Distributor?</a>
<a href="#">About Independent Producers Group</a>
<a href="#">News Events-- Status of Distributions</a>
<a href="#">Additional Monies That You May Not Be Collecting</a>
<a href="#">Contact Us</a>

Independent Producers Group (IPG) is an organization that was created to represent the interests of independent producers before the U.S. Copyright Office and the Copyright Arbitration Royalty Panel (CARP). Recognizing that the vast majority of potential recipients of cable and satellite retransmission royalties are not receiving monies they are due, and that exercise of their claim for such monies would be cost-prohibitive, IPG was created in order to provide a viable alternative to independent producers.

Every year, during the month of July, the owners and distributors of programming are entitled to make application to receive a part of the aggregate cable and satellite retransmission royalties collected by the U.S. Copyright Office. [For the 1999 calendar year, the amount of cable and satellite retransmission royalties collected by the Copyright Office equaled approximately \$107 Million and \$81 Million, respectively.] If a party fails to apply during the month of July, its claim to any part of the royalty pool is **forfeited**. If a party does submit a timely-filed application, it becomes one of several companies to assert a claim to the pool of available monies. In the syndicated programming area, only 150 companies have historically applied for cable and satellite retransmission royalties. Consequently, a significant percentage of independent producers otherwise entitled to receive such royalties fail to apply and receive the royalties they are due.

In order to determine the appropriate distribution of the collected royalties amongst the various claimants, the Copyright Office provides each claimant an opportunity to participate in arbitration proceedings designed to review evidence relating to the value of the claimant's claim. The expense associated with participation will typically reach **several hundred thousand dollars**, and for the overwhelming majority of claimants this expense significantly outweighs the benefits that may be derived therefrom. For this reason, participation for most companies can only occur vis-a-vis agent representation and through a sharing of costs with other claimants.

In order to assist independent producers, IPG prepares the wealth of documents that are required to be filed with the U.S. Copyright Office during the month of July, and afterward, and invites all companies to become part of the coalition representing itself before CARP.

IPG is currently representing its members' interests in proceedings before the U.S. Copyright Office, proceedings related to the 1997 distribution of cable royalties, with proceedings for subsequent years



and for satellite claims to commence in the near future. IPG has a small staff of employees in order to assist its members with their claims, and retains attorneys in Washington, D.C. to advocate its members' interests.

**Copyright 2000 Independent Producers Group**



# Independent Producers Group

## News Events--Status of Distributions

<a href="#">Programs Entitled 1999 Retransmission Royalties</a>
<a href="#">How It Works Retransmission Royalties</a>
<a href="#">IPG Distribution Methodology</a>
<a href="#">How To Become A Member</a>
<a href="#">Who Is Entitled Owner or Distributor?</a>
<a href="#">About Independent Producers Group</a>
<a href="#">News Events--Status of Distributions</a>
<a href="#">Additional Monies That You May Not Be Collecting</a>
<a href="#">Contact Us</a>

Independent Producers Group is currently participating in proceedings before the Copyright Office and Copyright Arbitration Royalty Panel relating to the distribution of cable royalties attributable to the 1997 broadcast year. Administrative hearings could commence as early as mid-July, and the proceedings have thusfar entailed the submission of IPG's "direct case" and the exchange of information with IPG's adversary in the proceedings.

The 1997 cable royalty proceedings are required to conclude within 180 days after they commence, and any award to IPG-represented claimants will occur at that time. If all matters proceed according to the schedule of prior years, the 1998 cable royalty proceedings (relating to claims filed in July 1999) will begin in or around September 2000.

Copyright 2000 Independent Producers Group



# Independent Producers Group

## Additional Monies That You May Not Be Collecting

Programs Entitled 1999 Retransmission Royalties
How It Works Retransmission Royalties
IPG Distribution Methodology
How To Become A Member
Who Is Entitled Owner or Distributor?
About Independent Producers Group
News Events - Status of Distributions
Additional Monies That You May Not Be Collecting
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Similar to the cable/satellite retransmission fees collected and distributed in the United States, several other types of ancillary revenues are collected and distributed by foreign governments. At current count, there are approximately 25 different sources of income within North America, Europe and Australasia, within the following territories:

- |           |                     |
|-----------|---------------------|
| Australia | Liechtenstein       |
| Austria   | Luxembourg          |
| Belgium   | Netherlands         |
| Canada    | New Zealand         |
| Denmark   | Norway              |
| Finland   | Republic of Ireland |
| France    | Spain               |
| Germany   | Sweden              |
| Japan     | Switzerland         |
|           | United States       |



These ancillary revenues basically fall into four different categories, Cable/Satellite Retransmission Royalties, Private Copying Levies, Educational Institution Levies and Rental Rights Levies. Irrespective of whether your program is licensed into any of the above territories, you might have monies waiting for you there. WHY? Because the monies are distributed to program owners/distributors whose works are retransmitted into the above territories, i.e., a program could be licensed into only one territory but could be retransmitted into multiple other territories. For example, a program licensed to the BBC in the United Kingdom will generate royalties from at least a dozen other territories and sources.

Most producers are unaware of these ancillary revenues, and unaware of how to collect them. Independent Producers Group does not apply for and collect these monies, but can inform you how you may go about doing so.

The most common means of comprehensively collecting these revenues is to engage an agent to perform this overhead-intensive function. Numerous entities collect from one or a handful of the various sources of income, or combine such collection efforts with the collection

of music-related revenues. If you would like to learn more about this subject, we suggest that you refer to [www.worldwidesg.com](http://www.worldwidesg.com), the web site for Worldwide Subsidy Group.

**Copyright 2000 Independent Producers Group**



# Independent Producers Group

Contact Us

<a href="#">Programs Entitled 1999 Retransmission Royalties</a>
<a href="#">How It Works Retransmission Royalties</a>
<a href="#">IPG Distribution Methodology</a>
<a href="#">How To Become A Member</a>
<a href="#">Who Is Entitled Owner or Distributor?</a>
<a href="#">About Independent Producers Group</a>
<a href="#">News Events Status of Distributions</a>
<a href="#">Additional Monies That You May Not Be Collecting</a>
<a href="#">Contact Us</a>

**Independent Producers Group**  
 19275 Stone Oak Parkway, #711  
 San Antonio, Texas 78258  
 210.490-9887  
 210.490-9779 (fax)  
[info@independentproducers.org](mailto:info@independentproducers.org)

Please provide the following contact information:

Name

Title

Organization

Work Phone

Fax

E-mail

URL

Comments:

Copyright 2000 Independent Producers Group

# **EXHIBIT 68**

## Representation Agreement

The following shall set forth the agreement between Worldwide Subsidy Group ("WSG") and Benny Hinn Ministries ("Principal"), dated as of July 7, 2000

1. Authorization: Principal hereby grants and assigns WSG the right to apply for and collect any and all monies distributed by audiovisual copyright collection societies throughout the world (e.g., monies derived from rights set forth on Exhibit "A" hereto) for all audiovisual works owned and/or distributed by Principal (the "Programs"). Monies received by WSG pursuant to such authorization are referred to herein as the "Distribution Proceeds". The foregoing authorization shall apply to Distribution Proceeds applicable to the Term or prior to the Term, irrespective of when such Distribution Proceeds are payable.
2. Term: The term of this Agreement shall commence upon the date hereof and terminate upon completion of the first full calendar semi-annual period following written notice by either party that the Agreement is terminated, provided that the Term shall be for a period of no less than three (3) years.
3. Distribution Information: Principal will promptly inform WSG of additional Programs owned and/or distributed by Principal. Promptly following WSG's request therefor, Principal shall provide WSG pertinent information regarding the Programs that will assist in the application for and collection of Distribution Proceeds, including the number of episodes produced (if applicable), the director(s), writer(s) and actor(s) for the Program, a list of each territory for which each Program is being distributed and the identity of the local distributor. Upon further request by WSG, Principal shall provide WSG any and all documents relating to the distribution of Programs in a territory.
4. Compensation to Principal/WSG: In consideration of the foregoing, WSG shall remit to Principal sixty percent (60%) of the Distribution Proceeds. WSG makes no representation as to the existence or amount of Distribution Proceeds.
5. Accounting and Payments: WSG shall account for and make payment of Principal's share of the Distribution Proceeds within thirty (30) days after each quarter-annual period following execution of this Agreement. Upon reasonable notice, Principal shall be entitled to inspect the books and records of WSG relating to the collection of the Distribution Proceeds, provided that the books and records relating to any statement rendered hereunder may only be inspected once, that inspection for all statements occur no frequently than once in any given calendar year, and that such right terminate with respect to any statement remitted hereunder two (2) years following Principal's receipt of such statement. All statements remitted hereunder shall be deemed approved and subject to no further claim by WSG unless objection thereto is made within two (2) years following Principal's receipt of such statement.

6. Confidentiality: Principal and WSG agree that neither party shall reveal the terms of this agreement to any third party unless required to do so by the authority of a court of competent jurisdiction. WSG agrees that WSG shall not reveal to any third party not engaged by WSG any of the Distribution Information provided to WSG hereunder.
7. Representations and Warranties: Principal warrants that Principal retains the exclusive authority to the Distribution Proceeds, and has not previously conveyed the right to collect the Distribution Proceeds to any third party.
8. Additional Documents: Principal agrees to execute such additional documents as are necessary in WSG's good faith discretion to evidence Principal's grant of authorization herein. If Principal has failed to execute such additional documents within fourteen (14) days following WSG's submission of such documents to Principal, WSG is hereby authorized to execute such documents on Principal's behalf.
9. Payment Authorization: If WSG receives payments pursuant to this agreement by check made payable directly to Principal, Principal hereby grants WSG the nonexclusive and limited authority to endorse and deposit such checks into WSG's account.
10. Notices: Notices hereunder shall be in writing, and be deemed effective when received. Notices to WSG shall be to Worldwide Subsidy Group, 9903 Santa Monica Blvd., Ste. 655, Beverly Hills, California 90212. Notices to Principal shall be to Benny Hinn Ministries, P.O. Box 168487, Irving, Texas 75016.
11. Law and Jurisdiction: The parties hereto agree that any interpretation of this Agreement shall be governed by California law, subject to the exclusive personal and subject matter jurisdiction of state and federal courts located in Los Angeles County, California.

If the foregoing comports with your understanding of this matter, please so signify by signing below.

Worldwide Subsidy Group ("WSG")

Benny Hinn Ministries (Principal)

By:   
An Authorized Signatory

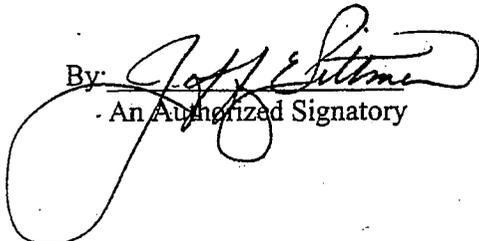
By:   
An Authorized Signatory

EXHIBIT "A"

1. Cable and Satellite Retransmission Royalties. Royalties and charges imposed by law with respect to the retransmission by cable or satellite of terrestrial broadcast signals.
2. Private Copying Levies. Levies and charges imposed by law on the distribution of blank videocassettes, videodiscs and playback devices, designed to compensate for the private copying of audiovisual works.
3. Educational Institution Levies. Royalties imposed by law with respect to the copying of audiovisual works from television broadcasts or retransmissions, where such copying is made by, or on behalf of, educational institutions.
4. Rental and Lending Levies. Royalties imposed by law with respect to the rental or lending of videocassettes and videodiscs to consumers.
5. Public Performance Television Royalties. Royalties imposed by law with respect to the exhibition to the public of audiovisual works by television broadcasts in publicly accessible businesses or establishments.
6. Public Performance Video Royalties. Royalties imposed by law with respect to the exhibition to the public of audiovisual works by television broadcasts in publicly accessible businesses or establishments.
7. Theatrical Box Office Levies. Royalties and charges imposed by law on ticket sales to consumers for viewing motion pictures in theaters.

# **EXHIBIT 69**

From: worldwidesg <worldwidesg@aol.com>  
To: mclarke <mclarke@bhmexec.org>  
Cc: MAWoodlief <MAWoodlief@bhmexec.org>; SBrown <SBrown@bhmexec.org>  
Subject: Re: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties  
Date: Mon, Nov 28, 2011 4:08 am

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Thank you Mr. Clarke, but aren't the programs "Benny Hinn", "Benny Hinn Daily", and "DaySpring Visitation with Benny Hinn" also your titles?

Denise Vernon  
Worldwide Subsidy Group

-----Original Message-----

From: Michael Clarke <mclarke@bhmexec.org>  
To: worldwidesg <worldwidesg@aol.com>  
Cc: Michael Clarke <mclarke@bhmexec.org>; Miles Woodlief <MAWoodlief@bhmexec.org>; Sheryl Brown <SBrown@bhmexec.org>  
Sent: Wed, Nov 23, 2011 12:32 pm  
Subject: RE: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Please see that attached, signifying our ownership/distribution of the "This Is Your Day" television program. Please also note that I've cc'd our new general counsel, Miles A. Woodlief. David Joe, esq., is no longer of counsel to us.

Thanks very much.

Michael D. Clarke, SVP/CFO  
World Healing Center Church  
O: 817.722.1234  
E: [mclarke@bhmexec.org](mailto:mclarke@bhmexec.org)

\_\_\_\_\_  
mdc

---

From: [worldwidesg@aol.com](mailto:worldwidesg@aol.com) [<mailto:worldwidesg@aol.com>]  
Sent: Wednesday, November 23, 2011 12:18 PM  
To: Michael Clarke  
Subject: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Subject line: **ROYALTIES OWED** for 2000-2003 cable and satellite retransmission royalties

Dear Mr./Ms. **Michael D. Clarke, SVP/CFO, David Joe, Esq.,**

You are being contacted as the identified representative (or alternate representative) of **Benny Hinn Ministries**, because your company's prior claim for cable and satellite retransmission royalties.

Several years ago, your company engaged Worldwide Subsidy Group LLC ("WSG") for the purpose of collecting U.S. cable and satellite retransmission royalties, an obscure royalty distributed by the U.S. Copyright Office. After several years, the U.S. Copyright Office has finally commenced proceedings for the distribution of 2000-2003 cable royalties. The aggregate pool of money collected by the Copyright Office for this timeframe equals **over \$780 Million**, to be distributed to all valid claimants. As part of WSG's

engagement, WSG has made annual claim on your behalf, thereby preserving your claim to royalties that would otherwise be forfeited.

WSG will be participating in the proceedings before the Copyright Office, advocating a particular methodology for the distribution of these royalties. In connection therewith, we need to identify all of our represented programs. As such, we need all represented claimants to review the attached Excel spreadsheet, which contains a list of the 2000-2003 royalty-generating programs, and identify which programs were owned or controlled during the 2000-2003 calendar years.

Please note that if you do not respond, your company may not receive any allocation of the substantial royalties that are scheduled for distribution.

We appreciate that the Excel program contains over 25,000 titles. Some titles will be allocated significantly more than others, i.e., there are \$1 Million claims and \$1 claims. However, please take note that when WSG first solicited your company it was because our preliminary analysis determined that significant royalties were owing to your company, generally no less than tens of thousands of dollars. In sum, it is well worth your while to review the attached list and identify programs controlled by your company. Please do not underestimate the value of any program, as a multitude of factors affect the value of royalties for the program, and are generally unrelated to the commercial value of the program.

**Instructions:** For those persons not thoroughly familiar with Excel, it is a very simple program with which to work. The Excel program allows one to search the information contained within each cell, simply by clicking on the "Find & Select" prompt (either on your "Home" tab or "Edit" tab, depending which Excel version is being used), and entering the information being sought, i.e., the program title. Make certain that your search does not seek just information that is an exact match within the cell, and that the search does not have to "match all cell contents". Rather, when you run a search, make certain that a match will be found even if the information is found in only "a part of the cell." Otherwise, unless you find an exact match, your search will come up short.

Please appreciate that the program titles are not always exact, and that a program title for the same show may be identified in multiple ways, e.g., "Oprah Winfrey", "The Oprah Winfrey Show", "Oprah", etc., so make certain that you identify all possible titles. In the foregoing example, only a search of "oprah" will yield all results. Make certain to keep clicking on the "Find Next" prompt until all results have been identified:

**Identify your programs:** The list of titles generating royalties appears in the first of two columns. The second column is blank, and is for the purpose of indicating which programs you control. If you find a match for a title controlled by your company during 2000-2003, enter your company name in the cell to the right of the program title, i.e., in the second column. Please indicate if your company did not control the program for the entirety of 2000-03. For example, next to the claimed title, with your company name, indicate the years of control ("XYZ Company, 2000-01"). Once all of your company's claimed programs are identified on the Excel program, save the revised Excel spreadsheet, and email it back to us.

If you or someone at your company are absolutely uncomfortable working with Excel, then forward us a list of all your programs, and we will begin the search process ourselves.

Many of the recipients of this email are receiving it as the distributor of the programs owned by third parties. If your role was as the distributor, then include the programs controlled by your company as the distributor. Please do not ask us the value of the program or the expected royalties. At this juncture, we simply do not know and cannot venture an estimate until proceedings fully commence and we are able to see the universe of all other programs being claimed by all other claimants.

We are asking that an individual knowledgeable with catalogue respond as soon as possible, **but no later than Friday, January 6, 2012**. The sooner that we receive your response, however, the better we can represent your interests.

In closing, the proceedings before the U.S. Copyright Office have been a long time coming, and WSG is anxious to partake in them in order to receive the royalties justly due to WSG's represented claimants.

If you have any questions, please feel free to contact us at (210) 789-9084.

Sincerely,

Denise Vernon  
Worldwide Subsidy Group LLC



# **EXHIBIT 70**

## Representation Agreement

The following shall set forth the agreement between Worldwide Subsidy Group ("WSG") and Creflo A. Dollar Ministries ("Principal"), dated as of July 20, 2000.

1. Authorization: Principal hereby grants and assigns WSG the right to apply for and collect any and all monies distributed by audiovisual copyright collection societies throughout the world (e.g., monies derived from rights set forth on Exhibit "A" hereto) for all audiovisual works owned and/or distributed by Principal (the "Programs"). Monies received by WSG pursuant to such authorization are referred to herein as the "Distribution Proceeds". The foregoing authorization shall apply to Distribution Proceeds applicable to the Term or prior to the Term, irrespective of when such Distribution Proceeds are payable.
2. Term: The term of this Agreement shall commence upon the date hereof and terminate upon completion of the first full calendar semi-annual period following written notice by either party that the Agreement is terminated, provided that the Term shall be for a period of no less than two (2) years.
3. Distribution Information: Principal will promptly inform WSG of additional Programs owned and/or distributed by Principal. Promptly following WSG's request therefor, Principal shall provide WSG pertinent information regarding the Programs that will assist in the application for and collection of Distribution Proceeds, including the number of episodes produced (if applicable), the director(s), writer(s) and actor(s) for the Program, a list of each territory for which each Program is being distributed and the identity of the local distributor. Upon further request by WSG, Principal shall provide WSG any and all documents relating to the distribution of Programs in a territory.
4. Compensation to Principal/WSG: In consideration of the foregoing, WSG shall remit to Principal seventy percent (70%) of the Distribution Proceeds. WSG makes no representation as to the existence or amount of Distribution Proceeds.
5. Accounting and Payments: WSG shall account for and make payment of Principal's share of the Distribution Proceeds within thirty (30) days after each quarter-annual period following execution of this Agreement. Said accounting shall be an itemized statement of all proceeds. Upon reasonable notice, Principal shall be entitled to inspect the books and records of WSG relating to the collection of the Distribution Proceeds, provided that the books and records relating to any statement rendered hereunder may only be inspected once, that inspection for all statements occur no frequently than once in any given calendar year, and that such right terminate with respect to any statement remitted hereunder two (2) years following Principal's receipt of such statement. All statements remitted hereunder shall be deemed approved and subject to no further claim by WSG unless objection thereto is made within two (2) years following Principal's receipt of such

statement, except for intentional misrepresentations discovered after the two-year period.

6. Confidentiality: Principal and WSG agree that neither party shall reveal the terms of this agreement to any third party unless required to do so by the authority of a court of competent jurisdiction. WSG agrees that WSG shall not reveal to any third party not engaged by WSG any of the Distribution Information provided to WSG hereunder.
7. Representations and Warranties: Principal warrants that Principal retains the exclusive authority to the Distribution Proceeds, and has not previously conveyed the right to collect the Distribution Proceeds to any third party.
8. Additional Documents: Principal agrees to execute such additional documents as are necessary in WSG's good faith discretion to evidence Principal's grant of authorization herein. If Principal has failed to execute such additional documents within fourteen (14) days following WSG's submission of such documents to Principal, WSG is hereby authorized to execute such documents on Principal's behalf, provided however that WSG will not sign any additional documents if informed not to do so.
9. Payment Authorization: If WSG receives payments pursuant to this agreement by check made payable directly to Principal, Principal hereby grants WSG the nonexclusive and limited authority to endorse and deposit such checks into WSG's account. WSG agrees that in the event that it negotiates any check payable to Principal it will remit a copy of such check to Principal as part of WSG's accounting to Principal.
10. Notices: Notices hereunder shall be in writing, and be deemed effective when received. Notices to WSG shall be to Worldwide Subsidy Group, 9903 Santa Monica Blvd., Ste. 655, Beverly Hills, California 90212. Notices to Principal shall be to Creflo A. Dollar Ministries, c/o Brewer, Brewer, Anthony & Middlebrook, 1159 Cottonwood Lane, Ste. 150, Irving, Texas 75038.
11. Law and Jurisdiction: The parties hereto agree that any interpretation of this Agreement shall be governed by California law, subject to the exclusive personal and subject matter jurisdiction of state and federal courts located in Los Angeles County, California.

If the foregoing comports with your understanding of this matter, please so signify by signing below.

Worldwide Subsidy Group ("WSG")

By:   
An Authorized Signatory

Creflo A. Dollar Ministries (Principal)

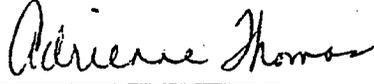
By:   
An Authorized Signatory

EXHIBIT "A"

1. Cable and Satellite Retransmission Royalties. Royalties and charges imposed by law with respect to the retransmission by cable or satellite of terrestrial broadcast signals.
2. Private Copying Levies. Levies and charges imposed by law on the distribution of blank videocassettes, videodiscs and playback devices, designed to compensate for the private copying of audiovisual works.
3. Educational Institution Levies. Royalties imposed by law with respect to the copying of audiovisual works from television broadcasts or retransmissions, where such copying is made by, or on behalf of, educational institutions.
4. Rental and Lending Levies. Royalties imposed by law with respect to the rental or lending of videocassettes and videodiscs to consumers.
5. Public Performance Television Royalties. Royalties imposed by law with respect to the exhibition to the public of audiovisual works by television broadcasts in publicly accessible businesses or establishments.
6. Public Performance Video Royalties. Royalties imposed by law with respect to the exhibition to the public of audiovisual works by television broadcasts in publicly accessible businesses or establishments.
7. Theatrical Box Office Levies. Royalties and charges imposed by law on ticket sales to consumers for viewing motion pictures in theaters.

# **EXHIBIT 71**

**From:** David Joe <davidjoe@amlawteam.com>  
**To:** worldwidesg <worldwidesg@aol.com>  
**Subject:** RE: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties  
**Date:** Wed, Dec 7, 2011 9:38 am

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Hello Denise, the only programs that we are aware of would be those same titles you have made previous recoveries for in Canada, although on the royalty statement it does not identify them, though your records should have them. They would be they producer of any program that by Creflo Dollar Ministries.

**I have located "Changing Your World" as a current program.**

*David R. Joe*  
Shareholder  
ANTHONY & MIDDLEBROOK, P.C.  
1702 E. Tyler St., Suite 1  
Harlingen, Texas 78550  
Tel (956) 428-5500  
Fax (956) 428-5518  
Cell (214) 235-5385  
E-Mail: [davidjoe@amlawteam.com](mailto:davidjoe@amlawteam.com)  
Website: [www.amlawteam.com](http://www.amlawteam.com)

CONFIDENTIALITY NOTIFICATION: This e-mail and any attachments to it is covered by the Electronic Communications Privacy Act, 18 U.S.C. Section 2510-2521 and may contain confidential information that is (1) subject to the Attorney-Client Privilege, (2) an attorney work product, or (3) strictly confidential. Do not read this e-mail if you are not the intended recipient. Disclosure, copying, distribution or use of any information in or attached to this e-mail is STRICTLY PROHIBITED. Unauthorized interception of this e-mail is a violation of federal criminal law. If you received this email in error, destroy the original and its attachments without reading or saving in any manner and immediately notify us by reply e-mail, or at (972) 444-8777. VIRUS NOTIFICATION: Our computer system is equipped with a virus scanner. However, no warranty is made that this material is free from computer virus or other defect. Any loss/damage incurred by using this material is not our responsibility. Our firm's entire liability shall be limited to resupplying the material.

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**From:** [worldwidesg@aol.com](mailto:worldwidesg@aol.com) [[worldwidesg@aol.com](mailto:worldwidesg@aol.com)]  
**Sent:** Wednesday, November 23, 2011 12:27 PM  
**To:** David Joe  
**Subject:** ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Subject line: **ROYALTIES OWED** for 2000-2003 cable and satellite retransmission royalties

Dear Mr./Ms. **David Joe, Esq., Anthony & Middlebrook,**

You are being contacted as the identified representative (or alternate representative) of **Creflo A. Dollar Ministries**, because your company's prior claim for cable and satellite retransmission royalties.

Several years ago, your company engaged Worldwide Subsidy Group LLC ("WSG") for the purpose of collecting U.S. cable and satellite retransmission royalties, an obscure royalty distributed by the U.S. Copyright Office. After several years, the U.S. Copyright Office has finally commenced proceedings for the distribution of 2000-2003 cable royalties. The aggregate pool of money collected by the Copyright Office for this timeframe equals **over \$780 Million**, to be distributed to all valid claimants. As part of WSG's engagement, WSG has made annual claim on your behalf, thereby preserving your claim to royalties that would otherwise be forfeited.

WSG will be participating in the proceedings before the Copyright Office, advocating a particular methodology for the distribution of these royalties. In connection therewith, we need to identify all of our represented programs. As such, we need all represented claimants to review the attached Excel spreadsheet, which contains a list of the 2000-2003 royalty-generating programs, and identify which programs were owned or controlled during the 2000-2003 calendar years.

Please note that if you do not respond, your company may not receive any allocation of the substantial royalties that are scheduled for distribution.

We appreciate that the Excel program contains over 25,000 titles. Some titles will be allocated significantly more than others, i.e., there are \$1 Million claims and \$1 claims. However, please take note that when WSG first solicited your company it was because our preliminary analysis determined that significant royalties were owing to your company, generally no less than tens of thousands of dollars. In sum, it is well worth your while to review the attached list and identify programs controlled by your company. Please do not underestimate the value of any program, as a multitude of factors affect the value of royalties for the program, and are generally unrelated to the commercial value of the program.

**Instructions:** For those persons not thoroughly familiar with Excel, it is a very simple program with which to work. The Excel program allows one to search the information contained within each cell, simply by clicking on the "Find & Select" prompt (either on your "Home" tab or "Edit" tab, depending which Excel version is being used), and entering the information being sought, i.e., the program title. Make certain that your search does not seek just information that is an exact match within the cell, and that the search does not have to "match all cell contents". Rather, when you run a search, make certain that a match will be found even if the information is found in only "a part of the cell." Otherwise, unless you find an exact match, your search will come up short.

Please appreciate that the program titles are not always exact, and that a program title for the same show may be identified in multiple ways, e.g., "Oprah Winfrey", "The Oprah Winfrey Show", "Oprah", etc., so make certain that you identify all possible titles. In the foregoing example, only a search of "oprah" will yield all results. Make certain to keep clicking on the "Find Next" prompt until all results have been identified.

**Identify your programs:** The list of titles generating royalties appears in the first of two columns. The second column is blank, and is for the purpose of indicating which programs you control. If you find a match for a title controlled by your company during 2000-2003, enter your company name in the cell to the right of the program title, i.e., in the second column. Please indicate if your company did not control the program for the entirety of 2000-03. For example, next to the claimed titled, with your company name, indicate the years of control ("XYZ Company, 2000-01"). Once all of your company's claimed programs are identified on the Excel program, save the revised Excel spreadsheet, and email it back to us.

If you or someone at your company are absolutely uncomfortable working with Excel, then forward us a list of all your programs, and we will begin the search process ourselves.

Many of the recipients of this email are receiving it as the distributor of the programs owned by third parties. If your role was as the distributor, then include the programs controlled by your company as the distributor. Please do not ask us the value of the program or the expected royalties. At this juncture, we simply do not know and cannot venture an estimate until proceedings fully commence and we are able to see the universe of all other programs being claimed by all other claimants.

We are asking that an individual knowledgeable with catalogue respond as soon as possible, **but no later than Friday, January 6, 2012**. The sooner that we receive your response, however, the better we can represent your interests.

In closing, the proceedings before the U.S. Copyright Office have been a long time coming, and WSG is anxious to partake in them in order to receive the royalties justly due to WSG's represented claimants.

If you have any questions, please feel free to contact us at (210) 789-9084.

Sincerely,

Denise Vernon

Worldwide Subsidy Group LLC



# **EXHIBIT 72**

Excerpt of IPG "Item 29 - - Claimant

dcast files (Creflo Dollar Ministries)"

id	date	time	day_of_w week	call_sign	origin ation_ code	syndicatio n_code	length	program_t ype	phase_1_ category	Unclaimed Broadcast	title	synopsis	year	director	actor_1
2482002	10100	1900	Saturday	WHNO	S		30	27			Creflo A. Dollar Jr.				
2190257	10200	630	Sunday	WWOR	S		30	27			Creflo A. Dollar Jr.				
2582296	10200	700	Sunday	WTLV	S		30	27			Creflo A. Dollar Jr.				
1052519	10200	700	Sunday	WDCA	S		30	27			Creflo A. Dollar Jr.				
1373301	10200	700	Sunday	WKBD	S		30	27			Creflo A. Dollar Jr.				
1721525	10200	700	Sunday	WPSG	S		30	27			Creflo A. Dollar Jr.				
1849543	10200	700	Sunday	WSBK	S		30	27			Creflo A. Dollar Jr.				
638715	10200	700	Sunday	KTLA	S		30	27			Creflo A. Dollar Jr.				
2462207	10200	700	Sunday	WDSI	S		30	27			Creflo A. Dollar Jr.				
431737	10200	730	Sunday	KMBC	S		30	27			Creflo A. Dollar Jr.				
878053	10200	730	Sunday	WAGA	S		30	27			Creflo A. Dollar Jr.				
2565643	10200	800	Sunday	WSFL	S		30	27			Creflo A. Dollar Jr.				
2594603	10200	800	Sunday	WTVZ	S		30	27			Creflo A. Dollar Jr.				
1539118	10200	800	Sunday	WNCT	S		30	27			Creflo A. Dollar Jr.				
505268	10200	800	Sunday	KPLR	S		30	27			Creflo A. Dollar Jr.				
1658878	10200	800	Sunday	WPGH	S		30	27			Creflo A. Dollar Jr.				
844971	10200	830	Sunday	KXTX	S		30	27			Creflo A. Dollar Jr.				
1397475	10200	830	Sunday	WKRN	S		30	27			Creflo A. Dollar Jr.				
2603332	10200	900	Sunday	WVUE	S		30	27			Creflo A. Dollar Jr.				
2517219	10200	930	Sunday	WMYD	S		30	27			Creflo A. Dollar Jr.				
1621532	10200	1030	Sunday	WNYW	S		30	27			Creflo A. Dollar Jr.				
844988	10200	2300	Sunday	KXTX	S		30	27			Creflo A. Dollar Jr.				
1052536	10300	30	Monday	WDCA	S		30	27			Creflo A. Dollar Jr.				
2052460	10300	100	Monday	WTFX	S		30	27			Creflo A. Dollar Jr.				
245952	10300	100	Monday	KCOP	S		30	27			Creflo A. Dollar Jr.				
2565664	10300	600	Monday	WSFL	S		30	27			Creflo A. Dollar Jr.				
2594627	10300	600	Monday	WTVZ	S		30	27			Creflo A. Dollar Jr.				
1052542	10300	600	Monday	WDCA	S		30	27			Creflo A. Dollar Jr.				
1849568	10300	600	Monday	WSBK	S		30	27			Creflo A. Dollar Jr.				
2578210	10300	630	Monday	WTGS	S		30	27			Creflo A. Dollar Jr.				

# **EXHIBIT 73**

**From:** David Joe <davidjoe@amlawteam.com>  
**To:** worldwidesg <worldwidesg@aol.com>  
**Subject:** RE: Creflo Dollar Ministries; final broadcast verification  
**Date:** Thu, May 17, 2012 11:30 am

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Denise, yes, I confirm that I have assurance from the client church that it owns all of the rights to programs with these names, as they appear in your spreadsheet below. Please confirm receipt by reply e-mail.

---

**From:** David Joe  
**Sent:** Thursday, May 17, 2012 11:06 AM  
**To:** worldwidesg@aol.com  
**Subject:** RE: Creflo Dollar Ministries; final broadcast verification

OK, I will confirm today, but to me Denise, I can't see that these titles, by the headers, could possibly be owned or controlled by anyone but the client. I will follow up, David

---

**From:** worldwidesg@aol.com [worldwidesg@aol.com]  
**Sent:** Thursday, May 17, 2012 10:57 AM  
**To:** David Joe  
**Subject:** Creflo Dollar Ministries; final broadcast verification

Dear David,

we ABSOLUTELY need your response at this time.

Thanks,  
Denise

-----Original Message-----

**From:** worldwidesg <worldwidesg@aol.com>  
**To:** davidjoe <davidjoe@amlawteam.com>  
**Sent:** Thu, May 10, 2012 11:11 am  
**Subject:** Creflo Dollar Ministries; final broadcast verification

Dear Sir/Madam,

As the final step in our process of representing your company's claim to 2000-2003 U.S. cable retransmission royalties, we have identified each broadcast of the programs that you previously informed us were owned or controlled by your company. These broadcasts appear in the attached Excel spreadsheet.

In some instances, multiple programs appear with the same title. Nevertheless, the broadcast information oftentimes provides additional information regarding the identity of the program. Consequently, and in order to preserve the integrity of your claim and the claims of all represented producers, it is imperative that your company confirm that the broadcasts appearing on the attached Excel spreadsheet were owned or controlled by your company.

At this point we need you to do two things:

- 1) Immediately forward a reply email confirming your receipt of this email and its attachment. A simple response with the word "Received" will suffice. If we do not receive this reply we will need to continue emailing and calling you until the delivery of the email is confirmed.
- 2) Immediately review the attached list of titles and identify any broadcast of a program that was not owned or controlled by your company. This must be handled in the following manner: in the column immediately next to the program title, headed "**Unclaimed Broadcast**", place an "x" only if the particular broadcast is of a program for which the free tv rights were not owned or controlled by your company at the time of the broadcast.

We are only a few weeks away from the filing of our direct case with the U.S. Copyright Office. Consequently, it is imperative that your company complete this task immediately. Failure to immediately respond could jeopardize your receipt of royalties, and we need your response no later than Tuesday, May 15, earlier if possible. We realize that this is a short time frame, however your cooperation is necessary as we are analyzing over eleven million broadcasts as part of our presentation.

Finally, allow me to remind you that this email contains highly proprietary information. Do not share this information with any third party, as doing so could potentially harm both your claim and the claims of several hundred other represented claimants.

Thank you for your immediate attention to this matter.

Denise Vernon  
Worldwide Subsidy Group

# **EXHIBIT 74**

## Representation Agreement

4

The following shall set forth the agreement between Worldwide Subsidy Group ("Agent") and Kenneth Copeland Ministries ("Principal"), dated as of June 12, 1998.

1. **Authorization:** Principal hereby grants and assigns Agent during the Term the right to apply for and collect any and all monies (the "Distribution Proceeds") distributed by audiovisual copyright collection societies throughout the world (e.g., blank videocassette levies, cable/satellite retransmission levies, etc.) for all audiovisual works owned and/or distributed by Principal (the "Programs"), including but not limited to those certain Programs attached hereto as Exhibit "A". Agent agrees to commence reasonable efforts to collect monies due in a manner that is prompt and consistent with industry standards.
2. **Term:** The term of this Agreement shall commence upon the date hereof and terminate upon completion of the first full calendar semi-annual period following written notice by either party that the Agreement is terminated, provided that the Term shall be for a period of no less than three (3) years. Notwithstanding the foregoing, the parties agree that Principal may terminate or cancel this agreement prior to conclusion of such three year period, provided that such termination occur no sooner than one year from the date hereof, and provided further that Principal shall not subsequently attempt via Principal or another agent to collect Distribution Proceeds sought by Agent under this agreement, absent Agent's written consent. Agent agrees to grant consent if Principal assigns Agent a Commission Interest at least equal to that interest stated in this agreement and pursuant to accounting provisions negotiated in good faith at such time.
3. **Distribution Information:** Principal will promptly inform Agent of additional Programs owned and/or distributed by Principal not appearing on Exhibit "A" hereto. Promptly following Agent's request therefor, Principal shall provide Agent pertinent information regarding the Programs that will assist in the application for and collection of Distribution Proceeds, including the number of episodes produced (if applicable), the director(s), writer(s) and actor(s) for the Program, a list of each territory for which each Program is being distributed and the identity of the local distributor. Upon further request by Agent, Principal shall provide Agent any and all documents relating to the distribution of Programs in a territory.
4. **Agent's Commission:** In consideration of the foregoing, Agent shall be entitled to retain twenty-five percent (25%) of the Distribution Proceeds received by Agent. Agent makes no representation as to the existence or amount of Distribution Proceeds. Agent shall be entitled to the foregoing commission upon any Distribution Proceeds applicable to the Term or prior to the Term, irrespective of when such Distribution Proceeds are payable.

5. **Accounting and Payments:** Agent shall account for and make payment of Principal's share of the Distribution Proceeds within thirty (30) days after each quarter-annual period following execution of this Agreement. Upon reasonable notice, Principal shall be entitled to inspect the books and records of Agent relating to the collection of the Distribution Proceeds, provided that the books and records relating to any statement rendered hereunder may only be inspected once, that inspection for all statements occur no frequently than once in any given calendar year, and that such right terminate with respect to any statement remitted hereunder two (2) years following Principal's receipt of such statement. All statements remitted hereunder shall be deemed approved and subject to no further claim by Agent unless objection thereto is made within two (2) years following Principal's receipt of such statement.
6. **Confidentiality:** Principal and Agent agree that neither party shall reveal the terms of this agreement to any third party unless required to do so by the authority of a court of competent jurisdiction. Agent agrees that Agent shall not reveal to any third party not engaged by Agent any of the Distribution Information provided to Agent hereunder.
7. **Representations and Warranties:** Principal warrants that Principal is the owner of copyright to the Programs, and has not previously conveyed the right to collect the Distribution Proceeds to any third party.
8. **Notices:** Notices hereunder shall be in writing, and be deemed effective when received. Notices to Agent shall be to Worldwide Subsidy Group, 9903 Santa Monica Blvd., Ste. 655, Beverly Hills, California 90212. Notices to Principal shall be to Kenneth Copeland Ministries, c/o Brewer Brewer Anthony & Middlebrook, 1159 Cottonwood Lane, Ste. 150, Irving, Texas 75038.
9. **Law and Jurisdiction:** In keeping with 1 Corinthians 6:1-8, all disputes which may arise between the parties shall be resolved in accordance with the Rules of Procedure for Christian Conciliation, Institute for Christian Conciliation. If efforts to conciliate or mediate the dispute fail, then the matter shall be resolved through binding arbitration. The decision of the arbitrators shall be binding on both parties, and both parties submit themselves to the personal jurisdiction of the courts of Los Angeles, California, both state and federal, for the entry of a judgment confirming the arbitrators' award. Each party shall bear their own costs, including attorney's fees, related to any mediation, conciliation or arbitration proceeding.
10. **Communications:** Agent agrees to direct and channel communications that request information from the Principal through Principal's attorney, the law firm of Brewer Brewer Anthony & Middlebrook.

11. **Indemnity:** Agent shall indemnify and hold harmless the Principal against any expenses that arise against the Principal as a result of Agent's performance of this Agreement, except any expenses Principal has agreed to incur under the terms of this Agreement.

If the foregoing comports with your understanding of this matter, please so signify by signing below.

Worldwide Subsidy Group ("Agent")

By:   
An Authorized Signatory

Kenneth Copeland Ministries ("Principal")

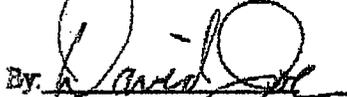
By:   
An Authorized Signatory

EXHIBIT "A" -- LIST OF PROGRAMS

Kenneth Copeland  
Kenneth Copeland Weekly

# **EXHIBIT 75**

From: David Joe <davidjoe@amlawteam.com>  
To: worldwidesg <worldwidesg@aol.com>  
Subject: RE: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties  
Date: Wed, Dec 7, 2011 9:37 am

*Kenneth Copeland*  
*- client contact*

Hello Denise, the only program that we are aware of would be that same title you have made previous recoveries for in Canada, the client is known as Kenneth Copeland Ministries.

**"Believer's Voice of Victory" sometimes abbreviated "BVOV"**

*David R. Joe*  
Shareholder  
ANTHONY & MIDDLEBROOK, P.C.  
1702 E. Tyler St., Suite 1  
Harlingen, Texas 78550  
Tel (956) 428-5500  
Fax (956) 428-5518  
Cell (214) 235-5385  
E-Mail: [davidjoe@amlawteam.com](mailto:davidjoe@amlawteam.com)  
Website: [www.amlawteam.com](http://www.amlawteam.com)

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**From:** [worldwidesg@aol.com](mailto:worldwidesg@aol.com) [[worldwidesg@aol.com](mailto:worldwidesg@aol.com)]  
**Sent:** Wednesday, November 23, 2011 12:29 PM  
**To:** David Joe  
**Subject:** ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Subject line: **ROYALTIES OWED** for 2000-2003 cable and satellite retransmission royalties

Dear Mr./Ms. **David Joe, Esq.**,

You are being contacted as the identified representative (or alternate representative) of **Eagle Mountain Int'l Church (Kenneth Copeland Ministries)**, because your company's prior claim for cable and satellite retransmission royalties.

Several years ago, your company engaged Worldwide Subsidy Group LLC ("WSG") for the purpose of collecting U.S. cable and satellite retransmission royalties, an obscure royalty distributed by the U.S. Copyright Office. After several years, the U.S. Copyright Office has finally commenced proceedings for the distribution of 2000-2003 cable royalties. The aggregate pool of money collected by the Copyright Office for this timeframe equals **over \$780 Million**, to be distributed to all valid claimants. As part of WSG's engagement, WSG has made annual claim on your behalf, thereby preserving your claim to royalties that would otherwise be forfeited.

WSG will be participating in the proceedings before the Copyright Office, advocating a particular methodology for the distribution of these royalties. In connection therewith, we need to identify all of our represented programs. As such, we need all represented claimants to review the attached Excel spreadsheet, which contains

**From:** David Joe <davidjoe@amlawteam.com>  
**To:** worldwidesg <worldwidesg@aol.com>  
**Subject:** RE: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties  
**Date:** Wed, Dec 7, 2011 9:37 am

---

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"Believer's Voice of Victory" sometimes abbreviated "BVOV"

*David R. Joe*  
Shareholder  
ANTHONY & MIDDLEBROOK, P.C.  
1702 E. Tyler St., Suite 1  
Harlingen, Texas 78550  
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Fax (956) 428-5518  
Cell (214) 235-5385  
E-Mail: [davidjoe@amlawteam.com](mailto:davidjoe@amlawteam.com)  
Website: [www.amlawteam.com](http://www.amlawteam.com)

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the distribution of 2000-2003 cable royalties. The aggregate pool of money collected by the Copyright Office for this timeframe equals *over \$780 Million*, to be distributed to all valid claimants. As part of WSG's engagement, WSG has made annual claim on your behalf, thereby preserving your claim to royalties that would otherwise be forfeited.

WSG will be participating in the proceedings before the Copyright Office, advocating a particular methodology for the distribution of these royalties. In connection therewith, we need to identify all of our represented programs. As such, we need all represented claimants to review the attached Excel spreadsheet, which contains a list of the 2000-2003 royalty-generating programs, and identify which programs were owned or controlled during the 2000-2003 calendar years.

Please note that if you do not respond, your company may not receive any allocation of the substantial royalties that are scheduled for distribution.

We appreciate that the Excel program contains over 25,000 titles. Some titles will be allocated significantly more than others, i.e., there are \$1 Million claims and \$1 claims. However, please take note that when WSG first solicited your company it was because our preliminary analysis determined that significant royalties were owing to your company, generally no less than tens of thousands of dollars. In sum, it is well worth your while to review the attached list and identify programs controlled by your company. Please do not underestimate the value of any program, as a multitude of factors affect the value of royalties for the program, and are generally unrelated to the commercial value of the program.

**Instructions:** For those persons not thoroughly familiar with Excel, it is a very simple program with which to work. The Excel program allows one to search the information contained within each cell, simply by clicking on the "Find & Select" prompt (either on your "Home" tab or "Edit" tab, depending which Excel version is being used), and entering the information being sought, i.e., the program title. Make certain that your search does not seek just information that is an exact match within the cell, and that the search does not have to "match all cell contents". Rather, when you run a search, make certain that a match will be found even if the information is found in only "a part of the cell." Otherwise, unless you find an exact match, your search will come up short.

Please appreciate that the program titles are not always exact, and that a program title for the same show may be identified in multiple ways, e.g., "Oprah Winfrey", "The Oprah Winfrey Show", "Oprah", etc., so make certain that you identify all possible titles. In the foregoing example, only a search of "oprah" will yield all results. Make certain to keep clicking on the "Find Next" prompt until all results have been identified.

**Identify your programs:** The list of titles generating royalties appears in the first of two columns. The second column is blank, and is for the purpose of indicating which programs you control. If you find a match for a title controlled by your company during 2000-2003, enter your company name in the cell to the right of the program title, i.e., in the second column. Please indicate if your company did not control the program for the entirety of 2000-03. For example, next to the claimed titled, with your company name, indicate the years of control ("XYZ Company, 2000-01"). Once all of your company's claimed programs are identified on the Excel program, save the revised Excel spreadsheet, and email it back to us.

If you or someone at your company are absolutely uncomfortable working with Excel, then forward us a list of all your programs, and we will begin the search process ourselves.

Many of the recipients of this email are receiving it as the distributor of the programs owned by third parties. If your role was as the distributor, then include the programs controlled by your company as the distributor. Please do not ask us the value of the program or the expected royalties. At this juncture, we simply do not know and cannot venture an estimate until proceedings fully commence and we are able to see the universe of all other programs being claimed by all other claimants.

We are asking that an individual knowledgeable with catalogue respond as soon as possible, **but no later than Friday, January 6, 2012**. The sooner that we receive your response, however, the better we can represent your interests.

In closing, the proceedings before the U.S. Copyright Office have been a long time coming, and WSG is anxious to partake in them in order to receive the royalties justly due to WSG's represented claimants.

If you have any questions, please feel free to contact us at (210) 789-9084.

Sincerely,

Denise Vernon

Worldwide Subsidy Group LLC



# **EXHIBIT 76**

Kenneth Copeland  
-cotelgwe

**From:** David Joe <davidjoe@amlawteam.com>  
**To:** worldwidesg <worldwidesg@aol.com>  
**Subject:** RE: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties  
**Date:** Tue, Mar 27, 2012 12:41 pm

Hello Raul, we can only confirm that the first 4 titles/names belong to KCM. 5 and 6 almost certainly do not, but the person with the definitive answer is out for several weeks.

1. Believer's Voice of Victory
2. BVOV
3. Kenneth Copeland
4. Kenneth Copeland's Believers Convention
5. R.W. Schambach October Tent Meeting Live With Kenneth Copeland
6. Believer's Chapel

**From:** David Joe  
**Sent:** Friday, March 23, 2012 12:14 PM  
**To:** [worldwidesg@aol.com](mailto:worldwidesg@aol.com)  
**Subject:** RE: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Hello Raul,

It's made its way to the right people, the list that is, and I hope to hear back soon confirming all those and any other names.

David R. Joe  
*State Bar of Texas*

Bar member  
Anthony & Middlebrook, PC  
1702 E. Tyler Street, Suite 1  
Harlingen, Texas 78550  
**Main:** 956 428 5300  
**Fax:** 956 428 5513  
**iPhone:** 214 235 5385  
**Web:** [www.amlawteam.com](http://www.amlawteam.com)  
[www.barofTX.com](http://www.barofTX.com)  
**Email:** [drjoe@amlawteam.com](mailto:drjoe@amlawteam.com)

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3/27/2012

**From:** David Joe <davidjoe@amlawteam.com>  
**To:** worldwidesg <worldwidesg@aol.com>  
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**Date:** Tue, Mar 27, 2012 12:41 pm

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1. **Believer's Voice of Victory**
2. **BVOV**
3. **Kenneth Copeland**
4. **Kenneth Copeland's Believers Convention**
5. **R.W. Schambach October Tent Meeting Live With Kenneth Copeland**
6. **Believer's Chapel**

---

**From:** David Joe  
**Sent:** Friday, March 23, 2012 12:14 PM  
**To:** worldwidesg@aol.com  
**Subject:** RE: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Hello Raul,

It's made its way to the right people, the list that is, and I hope to hear back soon confirming all those and any other names.

David R. Joe  
*State Bar of Texas*

Shareholder  
Anthony & Middlebrook, PC  
1702 E. Tyler Street, Suite 1  
Harlingen, Texas 78550  
**Main:** 956-428-5500  
**Fax:** 956-428-5518  
**iPhone:** 214-235-5385  
**Web:** [www.amlawteam.com](http://www.amlawteam.com)  
[www.churchlawgroup.com](http://www.churchlawgroup.com)  
**Email:** [davidjoe@amlawteam.com](mailto:davidjoe@amlawteam.com)

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<http://mail.aol.com/36962-112/aol-6/en-us/mail/PrintMessage.aspx>

9/17/2012

virus or other defect. Any loss/damage incurred by using this material is not our responsibility. Our firm's entire liability shall be limited to resupplying the material. **ALTERATION NOTIFICATION:** Because e-mail can be altered, the integrity of this communication cannot be guaranteed.

---

**From:** worldwidesg@aol.com [worldwidesg@aol.com]  
**Sent:** Friday, March 23, 2012 11:51 AM  
**To:** David Joe  
**Subject:** Re: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

David,

any response yet?

Raul

-----Original Message-----

**From:** David Joe <davidjoe@amlawteam.com>  
**To:** worldwidesg <worldwidesg@aol.com>  
**Sent:** Tue, Mar 20, 2012 5:30 pm  
**Subject:** RE: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Thanks raul, I have them looking into this name, too.

David R. Joe  
State Bar of Texas

Shareholder  
Anthony & Middlebrook, PC  
1702 E. Tyler Street, Suite 1  
Harlingen, Texas 78550  
**Main:** 956-428-5500  
**Fax:** 956-428-5518  
**iPhone:** 214-235-5385  
**Web:** [www.amlawteam.com](http://www.amlawteam.com)  
[www.churchlawgroup.com](http://www.churchlawgroup.com)  
**Email:** [davidjoe@amlawteam.com](mailto:davidjoe@amlawteam.com)

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**From:** [worldwidesg@aol.com](mailto:worldwidesg@aol.com) [[worldwidesg@aol.com](mailto:worldwidesg@aol.com)]  
**Sent:** Tuesday, March 20, 2012 2:56 PM  
**To:** David Joe  
**Subject:** Re: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

David, sorry, but there was also "Believer's Chapel" which may have belonged to Copeland, so could you check into this as well?

FYI, later on we will be sending out a list of all the claimed broadcasts, so if this only might be a program title, we can check later as well.

Raul

—Original Message—

**From:** David Joe <[davidjoe@amlawteam.com](mailto:davidjoe@amlawteam.com)>  
**To:** [worldwidesg](mailto:worldwidesg@aol.com) <[worldwidesg@aol.com](mailto:worldwidesg@aol.com)>  
**Sent:** Tue, Mar 20, 2012 1:29 pm  
**Subject:** RE: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Yes, I will confirm that and reply.

David R. Joe  
*State Bar of Texas*

Shareholder  
Anthony & Middlebrook, PC  
1702 E. Tyler Street, Suite 1  
Harlingen, Texas 78550  
**Main:** 956-428-5500  
**Fax:** 956-428-5518  
**iPhone:** 214-235-5385  
**Web:** [www.amlawteam.com](http://www.amlawteam.com)  
[www.churchlawgroup.com](http://www.churchlawgroup.com)  
**Email:** [davidjoe@amlawteam.com](mailto:davidjoe@amlawteam.com)

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---

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**Sent:** Tuesday, March 20, 2012 12:57 PM

**To:** David Joe

**Subject:** Re: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

David,

we had your prior response, and the email was really geared to the other 280+ producers. However, that email was in response to a list of only 25,000 titles, and we now believe that we need to look at a much larger list of 50,000 titles. At this time, we have the following titles for Kenneth Copeland Ministries:

Believer's Voice of Victory  
Kenneth Copeland  
Kenneth Copeland's Believers Convention  
R.W. Schambach October Tent Meeting Live With Kenneth Copeland

Can you please confirm that these all belong to Kenneth Copeland Ministries?

Thanks, Denise

—Original Message—

From: David Joe <[davidjoe@amlawteam.com](mailto:davidjoe@amlawteam.com)>

To: worldwidesg <[worldwidesg@aol.com](mailto:worldwidesg@aol.com)>

Sent: Tue, Mar 20, 2012 9:09 am

Subject: RE: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Hello Denise, similar to my accompanying e-mail regarding Creflo Dollar Ministries, I am sending you this e-mail again, from December, which responds to your request regarding Kenneth Copeland Ministries.

Hello Denise, the only program that we are aware of would be that same title you have made previous recoveries for in Canada, the client is known as Kenneth Copeland Ministries.

"Believer's Voice of Victory" sometimes abbreviated "BVOV"

**David R. Joe**

Shareholder

ANTHONY & MIDDLEBROOK, P.C.

1702 E. Tyler St., Suite 1

Harlingen, Texas 78550

Tel (956) 428-5500

Fax (956) 428-5518

Cell (214) 235-5385

E-Mail: [davidjoe@amlawteam.com](mailto:davidjoe@amlawteam.com)

Website: [www.amlawteam.com](http://www.amlawteam.com)

CONFIDENTIALITY NOTIFICATION: This e-mail and any attachments to it is covered by the Electronic Communications Privacy Act, 18 U.S.C. Section 2510-2521 and may contain confidential information that is (1) subject to the Attorney-Client Privilege, (2) an attorney work product, or (3) strictly confidential. Do not read this e-mail if you are not the intended recipient. Disclosure, copying, distribution or use of any information in or attached to this e-mail is STRICTLY PROHIBITED. Unauthorized interception of this e-mail is a violation of federal criminal law. If you received this email in error, destroy the original and its attachments without reading or saving in any manner and immediately notify us by reply e-mail, or at (972) 444-8777. VIRUS NOTIFICATION: Our computer system is equipped with a virus scanner. However, no warranty is made that this material is free from computer virus or other defect. Any loss/damage incurred by using this material is not our responsibility. Our firm's entire liability shall be limited to resupplying the material.

**From:** worldwidesg@aol.com [worldwidesg@aol.com]

**Sent:** Wednesday, March 14, 2012 9:07 PM

**To:** David Joe

**Subject:** ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Subject line: **ROYALTIES OWED** for 2000-2003 cable and satellite retransmission royalties

Dear David,

On February 27, we sent you an Excel spreadsheet containing several royalty-generating programs, and asked that you identify which programs were owned or controlled by your company. We realize that the spreadsheet can be intimidating or just time consuming, so if you choose not to provide us the requested information through the Excel search, we ask that you at least e-mail your program titles to us in order that we may conduct the Excel search ourselves.

As we have explained in earlier e-mails, the U.S. Copyright Office operates at a snail's pace. That is why they are just now getting to the 2000-2003 royalty claims. Despite their lag, we have abided by our contract with you and preserved your rights by making your claim for each given year. If we had not, you would have forfeited all rights to your royalties.

We have now come to the point where we need your cooperation and compliance with our contract. We have preserved your rights and expended large sums of monies to acquire and sort through an enormous amount of data so everyone can finally reap the fruits of their labors, (*IF* your programs are now identified).

If you wish to just send us a listing of your programs so we can do the search, that would be fine, but we need this information ASAP so we can claim *your* royalty rights for distribution.

Please respond by completion of the Excel spreadsheet, or send or provide your program list to us, by **no later than Monday, March 19, 2012.**

If you have any questions, please feel free to contact us at (210) 789-9084.

Sincerely,

Denise Vernon  
Worldwide Subsidy Group LLC



# **EXHIBIT 77**

**Excerpt of IPG "Item 29 -- Claimant Broadcasts (Kenneth Copeland Ministries)"**

id	date	time	day of week	call_sign	origination code	syndication code	length	program type	phase 1 category	Unclaimed Broadcast	title	synopsis	year
2590209	010200	0700	Sunday	WTTE	S		30	27	Devotional		Believer's Voice of Victory		
2469905	010200	0700	Sunday	WFXT	S		30	27	Devotional		Believer's Voice of Victory		
2462208	010200	0730	Sunday	WDSI	S		30	27	Devotional		Believer's Voice of Victory		
2486634	010200	0730	Sunday	WICZ	S		30	27	Devotional		Believer's Voice of Victory		
2421387	010200	0730	Sunday	WATL	S		30	27	Devotional		Believer's Voice of Victory		
2573765	010200	0730	Sunday	WSYT	S		30	27	Devotional		Believer's Voice of Victory		
2344930	010200	0800	Sunday	KJTV	S		30	27	Devotional		Believer's Voice of Victory		
2554957	010200	0830	Sunday	WPXT	S		30	27	Devotional		Believer's Voice of Victory		
2325333	010200	2300	Sunday	KBCW	S		30	27	Devotional		Believer's Voice of Victory		
2469929	010300	0600	Monday	WFXT	S		30	27	Devotional		Believer's Voice of Victory		
2504237	010300	0600	Monday	WJTC	S		30	27	Devotional		Believer's Voice of Victory		

# **EXHIBIT 78**

Kenneth Copeland  
-broadcast  
verification 5

From: David Joe <davidjoe@amlawteam.com>  
To: worldwidesg <worldwidesg@aol.com>  
Subject: RE: Kenneth Copeland Ministries; final broadcasts verification  
Date: Mon, May 21, 2012 1:25 pm

Denise, there was a cc named on this e-mail regarding Kenneth Copeland Ministries that is actually from a different devotional, the Creflo Dollar organization, which you might say is a "competing" devotional. Just to confirm, these KCM titles are fine though.

**From:** worldwidesg@aol.com [worldwidesg@aol.com]  
**Sent:** Friday, May 11, 2012 4:28 PM  
**To:** [Avaughan@worldchangers.org](mailto:Avaughan@worldchangers.org); David Joe  
**Subject:** Kenneth Copeland Ministries; final broadcasts verification

Dear Sir/Madam,

As the final step in our process of representing your company's claim to 2000-2003 U.S. cable retransmission royalties, we have identified each broadcast of the programs that you previously informed us were owned or controlled by your company. These broadcasts appear in the attached Excel spreadsheet.

In some instances, multiple programs appear with the same title. Nevertheless, the broadcast information oftentimes provides additional information regarding the identity of the program. Consequently, and in order to preserve the integrity of your claim and the claims of all represented producers, it is imperative that your company confirm that the broadcasts appearing on the attached Excel spreadsheet were owned or controlled by your company.

At this point we need you to do two things:

- 1) Immediately forward a reply email confirming your receipt of this email and its attachment. A simple response with the word "Received" will suffice. If we do not receive this reply we will need to continue emailing and calling you until the delivery of the email is confirmed.
- 2) Immediately review the attached list of titles and identify any broadcast of a program that was not owned or controlled by your company. This must be handled in the following manner: in the column immediately next to the program title, headed "**Unclaimed Broadcast**", place an "x" only if the particular broadcast is of a program for which the free tv rights were not owned or controlled by your company at the time of the broadcast.

We are only a few weeks away from the filing of our direct case with the U.S. Copyright Office. Consequently, it is imperative that your company complete this task immediately. Failure to immediately respond could jeopardize your receipt of royalties, and we need your response no later than Wednesday, May 16, earlier if possible. We realize that this is a short time frame, however your cooperation is necessary as we are analyzing over eleven million broadcasts as part of our presentation.

Finally, allow me to remind you that this email contains highly proprietary information. Do not share this information with any third party, as doing so could potentially harm both your claim and the claims of several hundred other represented claimants.

Thank you for your immediate attention to this matter.

Denise Vernon  
Worldwide Subsidy Group

# **EXHIBIT 79**

MANDATE AGREEMENT

The undersigned claimant hereby grants and assigns Independent Producers Group ("IPG") the exclusive right to apply for and collect on behalf of the undersigned (and all beneficial and/or legal owners of copyright identified on the attached Exhibit "A", collectively, the "Claimants") all monies distributed by the United States Copyright Office and the Copyright Arbitration Royalty Panel ("CARP") attributable to 2000 cable and satellite retransmission royalties distributed pursuant to 17 U.S.C. Sections 111 and 119, under the following terms and conditions:

1. The undersigned agrees, on behalf of itself and all beneficial and/or legal owners of copyright identified on the attached Exhibit "A", to accept the distribution methodology published at the IPG web site "www.independentproducers.org", hereby incorporated by reference.
2. Promptly upon IPG's request therefor, the Claimants shall provide IPG with an alphabetical list of program titles owned or distributed by the Claimants for which the Claimants retain the right to collect cable and satellite retransmission royalties.
3. IPG shall be entitled to establish all necessary and reasonable procedures required in order to accurately distribute retransmission royalties to the appropriate claimants.
4. IPG, its officers, agents or employees shall not be liable to the Claimants or to any person, firm or corporation for any act or omission in the prosecution of Claimants' claims.
5. The undersigned warrants that the undersigned retains the exclusive right to enter into this agreement and to apply for and collect cable and satellite retransmission royalties, as applicable, on behalf of the Claimants for the program titles provided to IPG.
6. In the event that the Claimants and another party make claim to the same program title, IPG will have no obligation to resolve such dispute, and shall be entitled to escrow funds attributable to the disputed program title until IPG is provided notification from the competing claimants of their resolution of such dispute, or until IPG is provided a ruling from a court of competent jurisdiction.
7. Any interpretation of this Agreement shall be governed by California law, subject to the exclusive personal and subject matter jurisdiction of state and federal courts located in Los Angeles County, California.
8. The undersigned, on behalf of itself and the Claimants, agrees to provide IPG all documentation necessary to substantiate the Claimants' right to collect retransmission royalties for program titles submitted to IPG. All program title claims made by the Claimants shall be subject to IPG's good faith confirmation of the Claimants' entitlement thereto.

AGREED AND ACCEPTED:

Willie Wilson Productions, Inc.

By: Willie Wilson

Typed/Printed Name: Willie Wilson

Title: President C.P.O.

Date: July 20, 2001

Independent Producers Group

By: [Signature]

An Authorized Signatory

# **EXHIBIT 80**

Representation Agreement

The following shall set forth the agreement between Worldwide Subsidy Group ("WSG") and Willie Wilson Productions, Inc. ("Principal"), dated as of April 15, 2002.

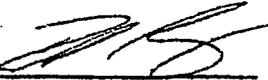
1. **Authorization:** Principal hereby grants and assigns WSG the right to apply for and collect any and all monies distributed by audiovisual copyright collection societies throughout the world (e.g., monies derived from rights set forth on Exhibit "A" hereto) for all audiovisual works owned and/or distributed by Principal (the "Programs"). Monies received by WSG pursuant to such authorization are referred to herein as the "Distribution Proceeds". The foregoing authorization shall apply to Distribution Proceeds applicable to the Term or prior to the Term, irrespective of when such Distribution Proceeds are payable.
2. **Term:** The term of this Agreement shall commence upon the date hereof and terminate upon completion of the first full calendar semi-annual period following written notice by either party that the Agreement is terminated, provided that the Term shall expire no sooner than June 30, 2003.
3. **Distribution Information:** Principal will promptly inform WSG of additional Programs owned and/or distributed by Principal. Promptly following WSG's request therefor, Principal shall provide WSG pertinent information regarding the Programs that will assist in the application for and collection of Distribution Proceeds, including the number of episodes produced (if applicable), the director(s), writer(s) and actor(s) for the Program, a list of each territory for which each Program is being distributed and the identity of the local distributor. Upon further request by WSG, Principal shall provide WSG any and all documents relating to the distribution of Programs in a territory.
4. **Compensation to Principal/WSG:** In consideration of the foregoing, WSG shall remit to Principal eighty percent (80%) of the Distribution Proceeds. WSG makes no representation as to the existence or amount of Distribution Proceeds.
5. **Accounting and Payment:** WSG shall account for and make payment of Principal's share of the Distribution Proceeds within thirty (30) days after each quarter-annual period following execution of this Agreement. Upon reasonable notice, Principal shall be entitled to inspect the books and records of WSG relating to the collection of the Distribution Proceeds, provided that the books and records relating to any statement rendered hereunder may only be inspected once, that inspection for all statements occur no frequently than once in any given calendar year, and that such right terminate with respect to any statement remitted hereunder two (2) years following Principal's receipt of such statement. All statements remitted hereunder shall be deemed approved and subject to no further claim by Principal unless objection thereto is made within two (2) years following Principal's receipt of such statement.

6. Confidentiality: Principal and WSG agree that neither party shall reveal the terms of this agreement to any third party unless required to do so by the authority of a court of competent jurisdiction or an agency seeking verification of WSG's engagement hereunder. Notwithstanding the foregoing, WSG shall be entitled to reveal relevant portions of this agreement to third parties for the specific purpose of verifying WSG's engagement hereunder, and in order to release Distribution Proceeds claimed hereunder. *This does not include attorney as third party*
7. Representations and Warranties: Principal warrants that Principal retains the exclusive authority to the Distribution Proceeds, and has not previously conveyed the right to collect the Distribution Proceeds to any third party.
8. Additional Documents: Principal agrees to execute such additional documents as are necessary in WSG's good faith discretion to evidence Principal's grant of authorization herein. If Principal has failed to execute such additional documents within fourteen (14) days following WSG's submission of such documents to Principal, WSG is hereby authorized to execute such documents on Principal's behalf.
9. Notices: Notices hereunder shall be in writing, and be deemed effective when received. Notices to WSG shall be to Worldwide Subsidy Group, 9903 Santa Monica Blvd., Ste. 655, Beverly Hills, California 90212. Notices to Principal shall be to Willie Wilson Productions, Inc., P.O. Box 129, Matteson, Illinois 60443.
10. Law and Jurisdiction: The parties hereto agree that any interpretation of this Agreement shall be governed by California law, subject to the exclusive personal and subject matter jurisdiction of state and federal courts located in Los Angeles County, California.

If the foregoing comports with your understanding of this matter, please so signify by signing below.

Worldwide Subsidy Group ("WSG")

Willie Wilson Productions, Inc. (Principal)

By:   
An Authorized Signatory

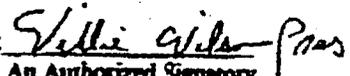
By:   
An Authorized Signatory

EXHIBIT "A"

1. Cable and Satellite Retransmission Royalties. Royalties and charges imposed by law with respect to the retransmission by cable or satellite of terrestrial broadcast signals.
2. Private Copying Levies. Levies and charges imposed by law on the distribution of blank videocassettes, videodisks and playback devices, designed to compensate for the private copying of audiovisual works.
3. Educational Institution Levies. Royalties imposed by law with respect to the copying of audiovisual works from television broadcasts or retransmissions, where such copying is made by, or on behalf of, educational institutions.
4. Rental and Lending Levies. Royalties imposed by law with respect to the rental or lending of videocassettes and videodisks to consumers.
5. Public Performance Television Royalties. Royalties imposed by law with respect to the exhibition to the public of audiovisual works by television broadcasts in publicly accessible businesses or establishments.
6. Public Performance Video Royalties. Royalties imposed by law with respect to the exhibition to the public of audiovisual works by video broadcasts in publicly accessible businesses or establishments.
7. Theatrical Box Office Levies. Royalties and charges imposed by law on ticket sales to consumers for viewing motion pictures in theaters.

# **EXHIBIT 81**

Excerpt of IPG "Item 29 -- Claimant Podcasts (Willie Wilson Productions)"

id	date	time	day of week	call sign	originatio n code	syndicatio n code	length	program_t ype	phase_1_ category	Unclaimed Broadcast	title	synopsis	year
2329679	10200	430	Sunday	KCBS	L		30	13			Singsation!		
979654	10200	530	Sunday	WCAU	S		30	21			Singsation!		
2453370	10200	600	Sunday	WDCW	S		30	21			Singsation!		
2421385	10200	600	Sunday	WATL	S		30	21			Singsation!		
11348882	10200	630	Sunday	WGNA	S		30	21			Singsation!		
2526318	10300	30	Monday	WNOL	S		30	21			Singsation!		
2329887	10900	430	Sunday	KCBS	S		30	62			Singsation!		
2337218	10900	500	Sunday	KIAH	S		30	21			Singsation!		
979859	10900	530	Sunday	WCAU	S		30	21			Singsation!		
2453615	10900	600	Sunday	WDCW	S		30	21			Singsation!		
2421628	10900	600	Sunday	WATL	S		30	21			Singsation!		
11349106	10900	630	Sunday	WGNA	S		30	21			Singsation!		
2526532	11000	30	Monday	WNOL	S		30	21			Singsation!		
2330098	11600	430	Sunday	KCBS	S		30	62			Singsation!		
2337468	11600	500	Sunday	KIAH	S		30	21			Singsation!		
980061	11600	530	Sunday	WCAU	S		30	21			Singsation!		
2453860	11600	600	Sunday	WDCW	S		30	21			Singsation!		
2421874	11600	600	Sunday	WATL	S		30	21			Singsation!		
11349331	11600	630	Sunday	WGNA	S		30	21			Singsation!		
2526750	11700	30	Monday	WNOL	S		30	21			Singsation!		
2330308	12300	430	Sunday	KCBS	S		30	62			Singsation!		
2337725	12300	500	Sunday	KIAH	S		30	21			Singsation!		
980263	12300	530	Sunday	WCAU	S		30	21			Singsation!		
2454105	12300	600	Sunday	WDCW	S		30	21			Singsation!		
2422124	12300	600	Sunday	WATL	S		30	21			Singsation!		
11349553	12300	630	Sunday	WGNA	S		30	21			Singsation!		
2526969	12400	30	Monday	WNOL	S		30	21			Singsation!		
2330521	13000	500	Sunday	KCBS	L		30	13			Singsation!		
2337984	13000	500	Sunday	KIAH	S		30	21			Singsation!		
980460	13000	530	Sunday	WCAU	S		30	21			Singsation!		
2454357	13000	600	Sunday	WDCW	S		30	21			Singsation!		
2422372	13000	600	Sunday	WATL	S		30	21			Singsation!		

# **EXHIBIT 82**

Re: Dr. Willie Wilson

Page 1 of 1

Willie Wilson  
- broadcast  
verification

From: omarorders <omarorders@omarinc.com>  
To: worldwidesg <worldwidesg@aol.com>  
Subject: Re: Dr. Willie Wilson  
Date: Thu, May 17, 2012 7:09 pm

CONFIRMED

Sent on the Sprint® Now Network from my BlackBerry®

From: worldwidesg@aol.com  
Date: Thu, 17 May 2012 19:55:42 -0400 (EDT)  
To: <omarorders@omarinc.com>  
Subject: Re: Dr. Willie Wilson

Mr. Wilson,

what we are looking for is just a confirmation that the broadcasts of "Singsation!" that were reported to you on an Excel spreadsheet are broadcasts of the show that you own. I know it sounds silly, because it is unlikely that there are two shows with such a name, but could you simply respond to this email with the statement "confirmed"?

Thanks

—Original Message—

From: omarorders <omarorders@omarinc.com>  
To: worldwidesg <worldwidesg@aol.com>  
Sent: Thu, May 17, 2012 6:02 pm  
Subject: Dr. Willie Wilson

Received. Sent on behalf of Dr. Willie Wilson.  
Sent on the Sprint® Now Network from my BlackBerry®

<http://mail.aol.com/36081-111/aol-6/en-us/mail/PrintMessage.aspx>

RESTRICTED - Subject to Protective Order in Docket No. 2008-2 CRB CD  
2000-2003 (Phase II)

5/17/2012

IPG   
111

# **EXHIBIT 83**

## MANDATE AGREEMENT

The undersigned claimant hereby grants and assigns Independent Producers Group ("IPG") the exclusive right to apply for and collect on behalf of the undersigned (and all beneficial and/or legal owners of copyright identified on the attached Exhibit "A", collectively, the "Claimants") all monies distributed by the United States Copyright Office and the Copyright Arbitration Royalty Panel ("CARP") attributable to 2000 cable and satellite retransmission royalties distributed pursuant to 17 U.S.C. Sections 111 and 119, under the following terms and conditions:

1. The undersigned agrees, on behalf of itself and all beneficial and/or legal owners of copyright identified on the attached Exhibit "A", to accept the distribution methodology published at the IPG web site "www.independentproducers.org", hereby incorporated by reference.
2. Promptly upon IPG's request therefor, the Claimants shall provide IPG with an alphabetical list of program titles owned or distributed by the Claimants for which the Claimants retain the right to collect cable and satellite retransmission royalties.
3. IPG shall be entitled to establish all necessary and reasonable procedures required in order to accurately distribute retransmission royalties to the appropriate claimants.
4. IPG, its officers, agents or employees shall not be liable to the Claimants or to any person, firm or corporation for any act or omission in the prosecution of Claimants' claims.
5. The undersigned warrants that the undersigned retains the exclusive right to enter into this agreement and to apply for and collect cable and satellite retransmission royalties, as applicable, on behalf of the Claimants for the program titles provided to IPG.
6. In the event that the Claimants and another party make claim to the same program title, IPG will have no obligation to resolve such dispute, and shall be entitled to escrow funds attributable to the disputed program title until IPG is provided notification from the competing claimants of their resolution of such dispute, or until IPG is provided a ruling from a court of competent jurisdiction.
7. Any interpretation of this Agreement shall be governed by California law, subject to the exclusive personal and subject matter jurisdiction of state and federal courts located in Los Angeles County, California.
8. The undersigned, on behalf of itself and the Claimants, agrees to provide IPG all documentation necessary to substantiate the Claimants' right to collect retransmission royalties for program titles submitted by to IPG. All program title claims made by the Claimants shall be subject to IPG's good faith confirmation of the Claimants' entitlement thereto.

### AGREED AND ACCEPTED:

Life Outreach International

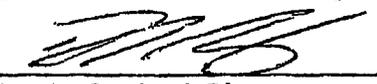
By: 

Typed/Printed Name: J. E. Gardiner

Title: Comptroller

Date: 7/18/01

Independent Producers Group

By: 

An Authorized Signatory

# **EXHIBIT 84**

LETTER OF EXTENSION

Reference is hereby made to the Mandate Agreement previously executed between Independent Producers Group ("IPG") and the undersigned claimant relating to the collection of monies distributed by the United States Copyright Office and the Copyright Arbitration Royalty Panel ("CARP"), and attributable to cable and satellite retransmission royalties distributed pursuant to 17 U.S.C. Sections 111 and 119.

1. IPG and the undersigned hereby agree that the terms of the Mandate Agreement shall further apply to retransmission royalties attributable to calendar year 2001 broadcasts and broadcasts occurring thereafter until the next concluding semi-annual period following written notice of termination by either the undersigned claimant or IPG.
2. All other terms of the agreement shall remain in full force and effect.

AGREED AND ACCEPTED:

**Life Outreach International**

**Independent Producers Group**

By: 

By:   
An Authorized Signatory

Typed/Printed Name: J. E. Gardiner  
Title: Director of Administration/ Comptroller  
Date: 10 May 2002

# **EXHIBIT 85**

Life Outreach Int'l.  
- catalogue

**From:** Tara Ganaway <tara.ganaway@loi.org>  
**To:** worldwidesg <worldwidesg@aol.com>  
**Cc:** Joyce Gardiner <joyce.gardiner@loi.org>  
**Subject:** 2000-2003 TITLES - ROYALTY GENERATING (2).xls  
**Date:** Wed, Jan 11, 2012 2:26 pm  
**Attachments:** 2000-2003\_TITLES\_-\_ROYALTY\_GENERATING\_(2).xls (2049K)

Dear Denise,

Attached please find the 2000-2003 Titles that I have highlighted as those that belong to Life Outreach International.

If you should have any questions/concerns please advise.

Regards,

Tara Ganaway

Administrative Assistant to the

VP of Administration

*The information in this message may be proprietary and/or confidential, and protected from disclosure. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify LIFE Outreach International immediately by replying to this message and deleting it from your computer.*

ROYALTY-GENERATING TITLES

James Robeson	Life Outreach
James Robison Africa	Life Outreach International
James Robison: Sudan	Life Outreach International
Life Outreach	Life Outreach International
Life Today	Life Outreach International
Life Today With James Robison	Life Outreach International
New Life Today	Life Outreach International
\$1 Total Gym Trial Offer	
\$10 Million Dollar Challenge	
\$29.99 Epil Bronze With Therma Spa	
\$39 Price Clock	
\$39 Roll-out	
\$39 Rollout	
\$39.95 Revo	
\$49 F W Plus	
\$49 Forever White	
\$49 Forever White Plus	
\$49 Forward Plus	
\$49 FW Plus	
\$49 Plus	
\$9.95 Rich Dad	
\$9.95 Trial Fund	
\$9.95 Trial Offer	
\$99 No Brainer	
\$99 Yoga V2	
Street	
60s Gold	
70s: The Decade That Changed Television	
80s Classics	
80s With Martha Quinn	
Allo, 'Allo	
Allo, 'Allo!	
N Gear	
Til There Was You	
Twas the Night Before Christmas	
*Batteries not included	

# **EXHIBIT 86**

Excerpt of IPG "Item 29 - - Claimant (Life Outreach International)"

id	date	time	day of week	call_sign	origin code	syndication code	length	program_type	phase_1_category	Unclaimed Broadcast	title	synopsis	year
9536292	30803	2100	Saturday	WPHL	S		30	62 I	Devotiona		James Robeson		
2542312	10300	800	Monday	WPCW	L		30	27			James Roberson		
2482068	10300	1430	Monday	WHNO	L		30	27			James Roberson		
2542353	10400	800	Tuesday	WPCW	L		30	27			James Roberson		
2482095	10400	1430	Tuesday	WHNO	L		30	27			James Roberson		
2542393	10500	800	Wednesda	WPCW	L		30	27			James Roberson		
2482122	10500	1430	Wednesda	WHNO	L		30	27			James Roberson		
2542432	10600	800	Thursday	WPCW	L		30	27			James Roberson		
2482149	10600	1430	Thursday	WHNO	L		30	27			James Roberson		
2542470	10700	800	Friday	WPCW	L		30	27			James Roberson		
2482176	10700	1430	Friday	WHNO	L		30	27			James Roberson		
2542561	11000	800	Monday	WPCW	L		30	27			James Roberson		
2482264	11000	1430	Monday	WHNO	L		30	27			James Roberson		
2542602	11100	800	Tuesday	WPCW	L		30	27			James Roberson		
2482303	11100	1430	Tuesday	WHNO	L		30	27			James Roberson		

# **EXHIBIT 87**

Page 1 of 1  
Life Outreach  
-catalogue  
-broadcast  
verification

From: Tara Ganaway <tara.ganaway@loi.org>  
To: worldwidesg <worldwidesg@aol.com>  
Cc: Joyce Gardiner <joyce.gardiner@loi.org>  
Subject: Life Outreach International Final broadcast verification  
Date: Thu, May 17, 2012 3:46 pm

Dear Denise,

What do you require for Life Outreach to do?

According to your email all we had to do is send a received notice which Joyce did on Friday the 11<sup>th</sup> of May.

I have gone through the list and to the best of our ability the list looks correct. We had no changes.

If we need to respond differently please advise.

Regards,  
Tara Ganaway  
Administrative Assistant to the  
VP of Administration

# **EXHIBIT 88**

**MANDATE AGREEMENT**

The undersigned claimant hereby grants and assigns Independent Producers Group ("IPG") the exclusive right to apply for and collect on behalf of the undersigned (and all beneficial and/or legal owners of copyright identified on the attached Exhibit "A", collectively, the "Claimants") all monies distributed by the United States Copyright Office and the Copyright Arbitration Royalty Panel ("CARP") attributable to 2001 cable and satellite retransmission royalties distributed pursuant to 17 U.S.C. Sections 111 and 119, under the following terms and conditions:

1. The undersigned agrees, on behalf of itself and all beneficial and/or legal owners of copyright identified on the attached Exhibit "A", to accept the distribution methodology published at the IPG web site "www.independentproducers.org", hereby incorporated by reference.
2. Promptly upon IPG's request therefor, the Claimants shall provide IPG with an alphabetical list of program titles owned or distributed by the Claimants for which the Claimants retain the right to collect cable and satellite retransmission royalties.
3. IPG shall be entitled to establish all necessary and reasonable procedures required in order to accurately distribute retransmission royalties to the appropriate claimants.
4. IPG, its officers, agents or employees shall not be liable to the Claimants or to any person, firm or corporation for any act or omission in the prosecution of Claimants' claims.
5. The undersigned warrants that the undersigned retains the exclusive right to enter into this agreement and to apply for and collect cable and satellite retransmission royalties, as applicable, on behalf of the Claimants for the program titles provided to IPG.
6. In the event that the Claimants and another party make claim to the same program title, IPG will have no obligation to resolve such dispute, and shall be entitled to escrow funds attributable to the disputed program title until IPG is provided notification from the competing claimants of their resolution of such dispute, or until IPG is provided a ruling from a court of competent jurisdiction.
7. Any interpretation of this Agreement shall be governed by California law, subject to the exclusive personal and subject matter jurisdiction of state and federal courts located in Los Angeles County, California.
8. The undersigned, on behalf of itself and the Claimants, agrees to provide IPG all documentation necessary to substantiate the Claimants' right to collect retransmission royalties for program titles submitted by to IPG. All program title claims made by the Claimants shall be subject to IPG's good faith confirmation of the Claimants' entitlement thereto.

**AGREED AND ACCEPTED:**

Billy Graham Evangelistic Association

By: Joel B. Aarsvold

Typed/Printed Name: Joel B. Aarsvold

Title: Secretary

Date: July 30, 2002

Independent Producers Group

By: [Signature]  
An Authorized Signatory

Exhibit A to Mandate Agreement

**Billy Graham Evangelistic Association**

For each joint claimant not executing the claim to which this Exhibit A is attached, the following information is hereby provided:

Joint Claimant's Name - World Wide Pictures  
Address - 1300 Harmon Place,  
City, State, Country - Minneapolis, MN 55403-1988 USA  
Phone # - 612/338-0500  
Fax # - 612/338-1513  
Contact Person - Justin Arnot

# **EXHIBIT 89**

**MANDATE AGREEMENT**

The undersigned claimant hereby grants and assigns Independent Producers Group (IPG) the exclusive right to apply for and collect on behalf of the undersigned all monies distributed by the United States Copyright Office and the Copyright Arbitration Royalty Panel (CARP) attributable to 2002 cable and satellite retransmission royalties distributed pursuant to 17 U.S.C. Sections 111 and 119, under the following terms and conditions:

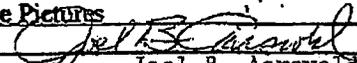
1. The undersigned agrees to accept the distribution methodology published at the IPG web site [www.independentproducers.org](http://www.independentproducers.org), hereby incorporated by reference.
2. Promptly upon IPG's request therefor, the undersigned shall provide IPG with an alphabetical list of program titles owned or distributed by the undersigned for which the undersigned retains the right to collect cable and satellite retransmission royalties.
3. IPG shall be entitled to establish all necessary and reasonable procedures required in order to accurately distribute retransmission royalties to the appropriate claimants.
4. IPG, its officers, agents or employees shall not be liable to the undersigned or to any person, firm or corporation for any act or omission in the prosecution of undersigned's claims.
5. The undersigned warrants that to the best of undersigned's knowledge, the undersigned retains the exclusive right to apply for and collect cable and satellite retransmission royalties, as applicable, for the program titles provided by the undersigned to IPG.
6. In the event that the undersigned and another party make claim to the same program title, IPG will have no obligation to resolve such dispute, and shall be entitled to escrow funds attributable to the disputed program title until IPG is provided notification from the competing claimants of their resolution of such dispute, or until IPG is provided a ruling from a court of competent jurisdiction.
7. Any interpretation of this Agreement shall be governed by California law, subject to the exclusive personal and subject matter jurisdiction of state and federal courts located in Los Angeles County, California.
8. The undersigned agrees to provide IPG all documentation necessary to substantiate the undersigned's right to collect retransmission royalties for program titles submitted by the undersigned. All program title claims made by the undersigned shall be subject to IPG's good faith confirmation of the undersigned's entitlement thereto.

**AGREED AND ACCEPTED: CLAIMANT**

**INDEPENDENT PRODUCERS GROUP**

Company Name: Billy Graham Evangelistic Association/  
World Wide Pictures

By: \_\_\_\_\_

By: 

An Authorized Signatory

Typed/Printed Name: Joel B. Aarsvold

Title: Secretary/Treasurer

Date: July 22, 2003

# **EXHIBIT 90**

**MANDATE AGREEMENT**

The undersigned claimant hereby grants and assigns Independent Producers Group (IPG) the exclusive right to apply for and collect on behalf of the undersigned all monies distributed by the United States Copyright Office and the Copyright Arbitration Royalty Panel (CARP) attributable to 2003 cable and satellite retransmission royalties distributed pursuant to 17 U.S.C. Sections 111 and 119, under the following terms and conditions:

1. The undersigned agrees to accept the distribution methodology published at the IPG web site [www.independentproducers.org](http://www.independentproducers.org), hereby incorporated by reference.
2. Promptly upon IPG's request therefor, the undersigned shall provide IPG with an alphabetical list of program titles owned or distributed by the undersigned for which the undersigned retains the right to collect cable and satellite retransmission royalties.
3. IPG shall be entitled to establish all necessary and reasonable procedures required in order to accurately distribute retransmission royalties to the appropriate claimants.
4. IPG, its officers, agents or employees shall not be liable to the undersigned or to any person, firm or corporation for any act or omission in the prosecution of undersigned's claims.
5. The undersigned warrants that to the best of undersigned's knowledge, the undersigned retains the exclusive right to apply for and collect cable and satellite retransmission royalties, as applicable, for the program titles provided by the undersigned to IPG.
6. In the event that the undersigned and another party make claim to the same program title, IPG will have no obligation to resolve such dispute, and shall be entitled to escrow funds attributable to the disputed program title until IPG is provided notification from the competing claimants of their resolution of such dispute, or until IPG is provided a ruling from a court of competent jurisdiction.
7. Any interpretation of this Agreement shall be governed by California law, subject to the exclusive personal and subject matter jurisdiction of state and federal courts located in Los Angeles County, California.
8. The undersigned agrees to provide IPG all documentation necessary to substantiate the undersigned's right to collect retransmission royalties for program titles submitted by the undersigned. All program title claims made by the undersigned shall be subject to IPG's good faith confirmation of the undersigned's entitlement thereto.

**AGREED AND ACCEPTED: CLAIMANT**

**INDEPENDENT PRODUCERS GROUP**

Company Name: Billy Graham Evangelistic Association/  
World Wide Pictures  
 By: [Signature]  
 Typed/Printed Name: Stephen G. Scholle  
 Title: VP of Administration & General Counsel  
 Date: 7/22/07

By: \_\_\_\_\_  
 An Authorized Signatory

# **EXHIBIT 91**

Writer's E-Mail: [jarnot@bgea.org](mailto:jarnot@bgea.org)  
Direct Dial: (704) 401-2585  
Fax: (704) 401-3008

June 28, 2005

Marian Oshita, Vice President  
Independent Producers Group  
9903 Santa Monica Blvd., # 655  
Beverly Hills, California 90212

Via Facsimile (310/372-1969) & Certified Mail

Dear Ms. Oshita:

The purpose of this letter is to terminate our agreements with Independent Producers Group dated July 22, 2003 and July 20, 2004, respectively, effective immediately. Those agreements specifically limited your services to television programming year 2002 and 2003. You and your company or affiliates are no longer authorized to claim to represent, to represent, or to file any future claims for our organization in any domestic or international matters.

Please provide me with copies and an accounting of all claims filed on behalf of Billy Graham Evangelistic Association and/or Worldwide Pictures, Inc. from any and all royalties collected from the Licensing Division of the United States Copyright Office, the Copyright Collective of Canada, and/or from any other entities with whom you may have filed claims. In addition, I would appreciate it if you would notify all copyright collectives with whom you have filed royalty claims that you no longer represent my organization. Kindly direct each entity to send future correspondence to my attention at the address printed on this letterhead.

Please feel free to call upon me with any questions or for discussion. Thank you.

Sincerely,

  
Justin T. Arnot  
Assistant General Counsel

JTA:nza

# **EXHIBIT 92**

Re: WSG -w- Billy Graham Evangelistic Association

Page 1 of 4

Billy Graham Evang. Ass  
-cctolojue

From: Hildebrand, Jason R. <jhildebrand@bgea.org>  
To: worldwidesg <worldwidesg@aol.com>  
Subject: Re: WSG -w- Billy Graham Evangelistic Association  
Date: Wed, Mar 28, 2012 5:46 pm

Denise,  
I did not notice these on the spreadsheet. We would control the first three listed, all devotional, but not the Gaither program.  
Thanks,  
Jason

On Mar 28, 2012, at 6:42 PM, "worldwidesg@aol.com" <worldwidesg@aol.com> wrote:

Jason,

as we were inputing the information, we noticed that you had not included the following titles:

Billy Graham Classic Crusades  
Billy Graham Ministries  
Billy Graham Youth Special  
Gaither Gospel Hour: A Billy Graham Music Homecoming

Was this in error? If the intention was to cull down the titles to only those which you know appeared in 2001-2003, I checked and confirmed that each of these titles appeared during that timeframe.

Denise

-----Original Message-----

From: Hildebrand, Jason R. <jhildebrand@bgea.org>  
To: worldwidesg <worldwidesg@aol.com>  
Sent: Wed, Mar 28, 2012 4:36 pm  
Subject: Re: WSG -w- Billy Graham Evangelistic Association

Ms. Vernon,

Thank you for your e-mail. All titles would be devotional.

Please let me know if you have any other questions.

Jason

On Mar 28, 2012, at 5:31 PM, "worldwidesg@aol.com" <worldwidesg@aol.com> wrote:

Mr. Hildebrand,

thank you for your response. Please appreciate that WSG wants to do a good job for your organization, and obtain the maximum claim for your organization.

Reviewing your titles, however, I have one more question to ask. The U.S. proceedings appropriate royalties on a variety of bases. "Devotional" programming, i.e., programming of particularly religious content, is in a separate category from all other types of programming, e.g., sports, entertainment.

Can you please inform us specifically which program titles you would consider "devotional"?

Thank you again,

<http://mail.aol.com/35810-111/aol-6/en-us/mail/PrintMessage>

Re: WSG -w- Billy Graham Evangelistic Association

Page 1 of 3

Billy Graham E  
- catalogue

From: Hildebrand, Jason R. <jhildebrand@bgea.org>  
To: worldwidesg <worldwidesg@aol.com>  
Subject: Re: WSG -w- Billy Graham Evangelistic Association  
Date: Wed, Mar 28, 2012 4:36 pm

Ms. Vernon,

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Jason

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Can you please inform us specifically which program titles you would consider "devotional"?

Thank you again,

Denise Vernon

-----Original Message-----

From: Hildebrand, Jason R. <jhildebrand@bgea.org>  
To: worldwidesg <worldwidesg@aol.com>  
Sent: Wed, Mar 28, 2012 3:09 pm  
Subject: RE: WSG -w- Billy Graham Evangelistic Association

Ms. Vernon,

Per your request, attached is the spreadsheet you provided to Billy Graham Evangelistic Association ("BGEA"), with BGEA listed as the owner for years 2001 - 2003 for the following titles:

- 2704 - Billy Graham
- 2705 - Billy Graham Crusade
- 2706 - Billy Graham Special
- 3914 - Caught
- 8290 - For Pete's Sake
- 11075 - Jerusalem
- 16291 - No Longer Alone
- 16685 - One Nation Under God
- 17826 - Power Play
- 18839 - Repeat Performance
- 20589 - Something To Sing About
- 22189 - The Homecoming

Please let us know if we can assist you further.

<http://mail.aol.com/35810-111/aol-6/en-us/mail/PrintMessage.aspx>

RESTRICTED - Subject to Protective Order in Docket No. 2008-2 CRB CD  
2000-2003 (Phase II)

IPG 1064

ROYALTY-GENERATING TITLES

Billy Graham	Billy Graham Evangelistic Association, 2001-2003
Billy Graham Crusade	Billy Graham Evangelistic Association, 2001-2003
Billy Graham Special	Billy Graham Evangelistic Association, 2001-2003
Caught	Billy Graham Evangelistic Association, 2001-2003
For Pete's Sake	Billy Graham Evangelistic Association, 2001-2003
Jerusalem	Billy Graham Evangelistic Association, 2001-2003
No Longer Alone	Billy Graham Evangelistic Association, 2001-2003
One Nation Under God	Billy Graham Evangelistic Association, 2001-2003
Power Play	Billy Graham Evangelistic Association, 2001-2003
Repeat Performance	Billy Graham Evangelistic Association, 2001-2003
Something to Sing About	Billy Graham Evangelistic Association, 2001-2003
The Homecoming	Billy Graham Evangelistic Association, 2001-2003
Billy Graham Classic Crusades	Billy Graham Evangelistic Association, 2001-2003
Billy Graham Ministries	Billy Graham Evangelistic Association, 2001-2003
Billy Graham Youth Special	Billy Graham Evangelistic Association, 2001-2003
10	
24	
227	
340	
09/11/11	
10/08/11	
\$1 Total Gym Trial Offer	
\$10 Million Dollar Challenge	
\$29.99 Epi Bronze With Therma Spa	
\$39 Price Clock	
\$39 Rollout	
\$39 Roll-out	
\$39.95 Revo	
\$49 F W Plus	
\$49 Forever White	
\$49 Forever White Plus	
\$49 Forward Plus	
\$49 FW Plus	
\$49 Plus	
\$9.95 Rich Dad	

From: Hildebrand, Jason R. <jhildebrand@bgea.org>  
To: worldwidesg <worldwidesg@aol.com>  
Subject: Re: WSG -w- Billy Graham Evangelistic Association  
Date: Wed, Mar 28, 2012 5:46 pm

---

Denise,  
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Thanks,  
Jason

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Billy Graham Ministries  
Billy Graham Youth Special  
Gaither Gospel Hour: A Billy Graham Music Homecoming

Was this in error? If the intention was to cull down the titles to only those which you know appeared in 2001-2003, I checked and confirmed that each of these titles appeared during that timeframe.

Denise

—Original Message—

From: Hildebrand, Jason R. <jhildebrand@bgea.org>  
To: worldwidesg <worldwidesg@aol.com>  
Sent: Wed, Mar 28, 2012 4:36 pm  
Subject: Re: WSG -w- Billy Graham Evangelistic Association

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Please let me know if you have any other questions.

Jason

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Reviewing your titles, however, I have one more question to ask. The U.S. proceedings appropriate royalties on a variety of bases. "Devotional" programming, i.e., programming of particularly religious content, is in a separate category from all other types of programming, e.g., sports, entertainment.

Can you please inform us specifically which program titles you would consider "devotional"?

Thank you again,

Denise Vernon

—Original Message—

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To: worldwidesg <worldwidesg@aol.com>

Sent: Wed, Mar 28, 2012 3:09 pm

Subject: RE: WSG -w- Billy Graham Evangelistic Association

Ms. Vernon,

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- 2704 – Billy Graham
- 2705 – Billy Graham Crusade
- 2706 - Billy Graham Special
- 3914 – Caught
- 8290 – For Pete's Sake
- 11075 – Jerusalem
- 16291 – No Longer Alone
- 16685 – One Nation Under God
- 17826 – Power Play
- 18839 – Repeat Performance
- 20589 – Something To Sing About
- 22189 – The Homecoming

Please let us know if we can assist you further.

Thank you,

Jason

Jason R. Hildebrand  
Associate Counsel  
Billy Graham Evangelistic Association  
1 Billy Graham Parkway  
Charlotte, NC 28201  
Phone: 704-401-2586  
Fax: 704-401-3008  
[jhildebrand@bgea.org](mailto:jhildebrand@bgea.org)  
[www.billygraham.org](http://www.billygraham.org)

From: [worldwidesg@aol.com](mailto:worldwidesg@aol.com) [mailto:[worldwidesg@aol.com](mailto:worldwidesg@aol.com)]

Sent: Friday, March 23, 2012 8:36 PM

To: Aarsvold, Joel; Hildebrand, Jason R.

Cc: [brianb@ix.netcom.com](mailto:brianb@ix.netcom.com)

Subject: WSG -w- Billy Graham Evangelistic Association

Gentlemen,

WSG entered into two agreements with Billy Graham Evangelistic Association ("BGEA"), one on July 22, 2003, and another on July 20, 2004, relating to the collection of 2002 and 2003 U.S. retransmission royalties. Pursuant to paragraphs 2 and 8 of each agreement, your organization is to provide WSG with its list of titles, and otherwise cooperate with WSG's substantiation of your catalogue. In connection therewith, starting in November 2011 WSG began forwarding numerous emails to Mr. Aarsvold requesting such title specification, to which no response has been forthcoming.

Per my conversation with Jason Hildebrand this afternoon, I was informed that BGEA is refusing to formally acknowledge its titles. Reference was made to BGEA termination letter, dated June 28, 2005, as the basis for such refusal. Such termination letter specifically acknowledges WSG's entitlement to make claim for 2002 and 2003 retransmission royalties, but provides no evident basis for BGEA's refusal to comply with its contractual obligations.

WSG has complied, and continues to comply, with its obligations under the agreements. WSG preserved BGEA's claims to 2002 and 2003 royalties, has expended hundreds of thousands of dollars in the acquisition of broadcast data necessary to substantiate BGEA's claims, and made scores of filings over the last ten years in order to avoid the forfeiture of BGEA's claims. It is therefore confusing on what basis BGEA believes that it is entitled to disregard its obligations under the agreement. BGEA is legally (and contractually) incapable of collecting on these claims itself, as such entitlement was created pursuant to WSG's "joint claims" filed with the U.S. Copyright Office in 2003 and 2004, and multiple "notices of intent to participate" filings over the last decade, thereby precluding collection of BGEA royalties except vis-à-vis WSG.

WSG assesses that BGEA's claims are worth substantial amounts. WSG will not walk away from these claims. If BGEA persists with its refusal, WSG will have no recourse other than to seek redress against BGEA in the state or federal courts appearing in Los Angeles County, California, pursuant to paragraph 7 of the agreements.

Let me clarify that I do not enjoy raising such matters, however BGEA's refusal to cooperate, which is afforded without explanation, is a brazen breach of contract. BGEA cannot unilaterally determine that a contract is of no further force or effect or that it will no longer cooperate, and such position is particularly distasteful after significant services have already been provided by WSG.

The alternative to a lawsuit against BGEA is for BGEA to cooperate by simply providing WSG with the titles of programs it owns or controls, allow WSG to complete its services, and for BGEA to receive its royalties. As noted, BGEA is legally incapable of collecting these royalties via WSG's prior filings. As such, there appears to be no upside to BGEA's refusal to

cooperate, as BGEA will receive nothing. Given such circumstances, the choice of alternatives appears obvious.

Please immediately confirm BGEA's intention to comply with its contractual obligations, and provide WSG with BGEA's list of programs, in order that this matter not reduce itself to a legal dispute.

Thank you, and I look forward to your immediate response.

Denise Vernon  
Worldwide Subsidy Group

# **EXHIBIT 93**

From: Hildebrand, Jason R. <jhildebrand@bgea.org>  
To: worldwidesg <worldwidesg@aol.com>  
Subject: RE: Billy Graham Evang. Assn.; final broadcast verification  
Date: Thu, May 17, 2012 12:31 pm  
Attachments: Copy\_of\_Billy\_Graham\_Evangelistic\_Association.xls (309K)

Billy Graham  
- broadcast  
certificate

Denise,

Attached is the spreadsheet with "x" marked in the appropriate cells.

Thank you,  
Jason

Jason R. Hildebrand  
Associate Counsel  
Billy Graham Evangelistic Association  
1 Billy Graham Parkway  
Charlotte, NC 28201  
Phone: 704-401-2586  
Fax: 704-401-3008  
[jhildebrand@bgea.org](mailto:jhildebrand@bgea.org)  
[www.billygraham.org](http://www.billygraham.org)

**From:** [worldwidesg@aol.com](mailto:worldwidesg@aol.com) [<mailto:worldwidesg@aol.com>]  
**Sent:** Thursday, May 17, 2012 11:43 AM  
**To:** Aarsvold, Joel; Hildebrand, Jason R.  
**Subject:** Billy Graham Evang. Assn.; final broadcast verification

Dear Mr. Aarsvold and Mr. Hildebrand,

we ABSOLUTELY need your response at this time.

Thanks,  
Denise

-----Original Message-----

**From:** worldwidesg <[worldwidesg@aol.com](mailto:worldwidesg@aol.com)>  
**To:** jaarsvold <[jaarsvold@bgea.org](mailto:jaarsvold@bgea.org)>  
**Sent:** Thu, May 10, 2012 10:41 am  
**Subject:** Billy Graham Evang. Assn.; final broadcast verification

Dear Sir/Madam,

As the final step in our process of representing your company's claim to 2000-2003 U.S. cable retransmission royalties, we have identified each broadcast of the programs that you previously informed us were owned or controlled by your company. These broadcasts appear in the attached Excel spreadsheet.

In some instances, multiple programs appear with the same title. Nevertheless, the broadcast information oftentimes provides additional information regarding the identity of the program. Consequently, and in order to preserve the integrity of your claim and the claims of all represented producers, it is imperative that your company confirm that the broadcasts appearing on the attached Excel spreadsheet were owned or controlled by your company.

**From:** Hildebrand, Jason R. <jhildebrand@bgea.org>  
**To:** worldwidesg <worldwidesg@aol.com>  
**Subject:** RE: Billy Graham Evang. Assn.; final broadcast verification  
**Date:** Thu, May 17, 2012 12:31 pm  
**Attachments:** Copy\_of\_Billy\_Graham\_Evangelistic\_Association.xls (309K)

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Denise,

Attached is the spreadsheet with "x" marked in the appropriate cells.

Thank you,

Jason

Jason R. Hildebrand  
Associate Counsel  
Billy Graham Evangelistic Association  
1 Billy Graham Parkway  
Charlotte, NC 28201  
Phone: 704-401-2586  
Fax: 704-401-3008  
[jhildebrand@bgea.org](mailto:jhildebrand@bgea.org)  
[www.billygraham.org](http://www.billygraham.org)

**From:** [worldwidesg@aol.com](mailto:worldwidesg@aol.com) [<mailto:worldwidesg@aol.com>]  
**Sent:** Thursday, May 17, 2012 11:43 AM  
**To:** Aarsvold, Joel; Hildebrand, Jason R.  
**Subject:** Billy Graham Evang. Assn.; final broadcast verification

Dear Mr. Aarsvold and Mr. Hildebrand,

we ABSOLUTELY need your response at this time.

Thanks,

Denise

<http://mail.aol.com/36962-112/aol-6/en-us/mail/PrintMessage.aspx>

9/17/2012

## —Original Message—

From: worldwidesg <worldwidesg@aol.com>  
To: jaarsvold <jaarsvold@bgea.org>  
Sent: Thu, May 10, 2012 10:41 am  
Subject: Billy Graham Evang. Assn.; final broadcast verification

Dear Sir/Madam,

As the final step in our process of representing your company's claim to 2000-2003 U.S. cable retransmission royalties, we have identified each broadcast of the programs that you previously informed us were owned or controlled by your company. These broadcasts appear in the attached Excel spreadsheet.

In some instances, multiple programs appear with the same title. Nevertheless, the broadcast information oftentimes provides additional information regarding the identity of the program. Consequently, and in order to preserve the integrity of your claim and the claims of all represented producers, it is imperative that your company confirm that the broadcasts appearing on the attached Excel spreadsheet were owned or controlled by your company.

At this point we need you to do two things:

- 1) Immediately forward a reply email confirming your receipt of this email and its attachment. A simple response with the word "Received" will suffice. If we do not receive this reply we will need to continue emailing and calling you until the delivery of the email is confirmed.
  
- 2) Immediately review the attached list of titles and identify any broadcast of a program that was not owned or controlled by your company. This must be handled in the following manner: in the column immediately next to the program title, headed "**Unclaimed Broadcast**", place an "x" only if the particular broadcast is of a program for which the free tv rights were not owned or controlled by your company at the time of the broadcast.

We are only a few weeks away from the filing of our direct case with the U.S. Copyright Office. Consequently, it is imperative that your company complete this task immediately. Failure to immediately respond could jeopardize your receipt of royalties, and we need your response no later than Tuesday, May 15, earlier if possible. We realize that this is a short time frame, however your cooperation is necessary as we are analyzing over eleven million broadcasts as part of our presentation.

Finally, allow me to remind you that this email contains highly proprietary information. Do not share this information with any third party, as doing so could potentially harm both your claim and the claims of several hundred other represented claimants.

Thank you for your immediate attention to this matter.

Denise Vernon

Worldwide Subsidy Group

<http://mail.aol.com/36962-112/aol-6/en-us/mail/PrintMessage.aspx>

9/17/2012

# **EXHIBIT 94**

Excerpt of IPG "Item 30 - - Unclaimed Broadcasts (Billy Graham Evangelistic Association)"

id	date	time	day of week	call sign	originatio n code	syndicatio n code	length	program_t ype	phase_1_ category	Unclaimed Broadcast	title
5471124	120101	1800	Saturday	WWOR	S		60	10	Devotiona		Billy Graham
4955780	120101	2000	Saturday	WPHL	S		60	10	Devotiona		Billy Graham
4755146	120101	2000	Saturday	WLVI	S		60	10	Devotiona		Billy Graham
5237760	120301	1900	Monday	WTRF	S		60	10	Devotiona		Billy Graham
3428720	120301	1900	Monday	KARK	S		60	10	Devotiona		Billy Graham
4789011	120301	2000	Monday	WMAR	S		60	10	Devotiona		Billy Graham
5437117	120301	2000	Monday	WWBT	S		60	10	Devotiona		Billy Graham
4592833	120301	2000	Monday	WIS	S		60	10	Devotiona		Billy Graham
4288531	120401	1900	Tuesday	WCFT	S		60	10	Devotiona		Billy Graham
4799949	120401	1900	Tuesday	WMC	S		60	10	Devotiona		Billy Graham
4299574	120401	2000	Tuesday	WCHS	S		60	10	Devotiona		Billy Graham
5029282	120401	2000	Tuesday	WPTA	S		60	10	Devotiona		Billy Graham
4424040	120501	1900	Wednesda y	WFAA	S		60	10	Devotiona		Billy Graham
3742091	120501	1900	Wednesda y	KMOV	S		60	10	Devotiona		Billy Graham
4145437	120501	2100	Wednesda y	WAFB	S		60	10	Devotiona		Billy Graham
5298005	120501	2100	Wednesda y	WTVF	S		60	10	Devotiona		Billy Graham

Excerpt of IPG "Item 30 - - Unclaimed Brothers (Billy Graham Evangelistic Association)

synopsis	year	director	actor_1	actor_2
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				
Theme: "Sept. 11 and the Love of God." Musical performances by Crystal Lewis and George Beverly Shea. From Fresno, Calif				

# **EXHIBIT 95**

From: Ken Vancil <kenv@jvim.com>  
To: worldwidesg <worldwidesg@aol.com>  
Subject: RE: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties  
Date: Tue, Dec 27, 2011 10:31 am  
Attachments: Copy\_of\_2000-2003\_TITLES\_-\_ROYALTY\_GENERATING\_Jack\_Van\_Impe\_Ministries.xls (2050K)

---

From: worldwidesg@aol.com [mailto:worldwidesg@aol.com]  
Sent: Wednesday, November 23, 2011 1:47 PM  
To: kenv@jvim.com  
Subject: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Subject line: **ROYALTIES OWED** for 2000-2003 cable and satellite retransmission royalties

Dear Mr./Ms. **Ken Vancil**,

You are being contacted as the identified representative (or alternate representative) of **Jack Van Impe Ministries International**, because your company's prior claim for cable and satellite retransmission royalties.

Several years ago, your company engaged Worldwide Subsidy Group LLC ("WSG") for the purpose of collecting U.S. cable and satellite retransmission royalties, an obscure royalty distributed by the U.S. Copyright Office. After several years, the U.S. Copyright Office has finally commenced proceedings for the distribution of 2000-2003 cable royalties. The aggregate pool of money collected by the Copyright Office for this timeframe equals **over \$780 Million**, to be distributed to all valid claimants. As part of WSG's engagement, WSG has made annual claim on your behalf, thereby preserving your claim to royalties that would otherwise be forfeited.

WSG will be participating in the proceedings before the Copyright Office, advocating a particular methodology for the distribution of these royalties. In connection therewith, we need to identify all of our represented programs. As such, we need all represented claimants to review the attached Excel spreadsheet, which contains a list of the 2000-2003 royalty-generating programs, and identify which programs were owned or controlled during the 2000-2003 calendar years.

Please note that if you do not respond, your company may not receive any allocation of the substantial royalties that are scheduled for distribution.

We appreciate that the Excel program contains over 25,000 titles. Some titles will be allocated significantly more than others, i.e., there are \$1 Million claims and \$1 claims. However, please take note that when WSG first solicited your company it was because our preliminary analysis determined that significant royalties were owing to your company, generally no less than tens of thousands of dollars. In sum, it is well worth your while to review the attached list and identify programs controlled by your company. Please do not underestimate the value of any program, as a multitude of factors affect the value of royalties for the program, and are generally unrelated to the commercial value of the program.

**Instructions:** For those persons not thoroughly familiar with Excel, it is a very simple program with which to work. The Excel program allows one to search the information contained within each cell, simply by clicking on the "Find & Select" prompt (either on your "Home" tab or "Edit" tab, depending which Excel version is being used), and entering the information being sought, i.e., the program title. Make certain that your search does not seek just information that is an exact match within the cell, and that the search does not have to "match all cell contents". Rather, when you run a search, make certain that a match will be found even if the information is found in only "a part of the cell." Otherwise, unless you find an exact match, your search will come up short.

Please appreciate that the program titles are not always exact, and that a program title for the same show may be identified in multiple ways, e.g., "Oprah Winfrey", "The Oprah Winfrey Show", "Oprah", etc., so make certain

<http://mail.aol.com/36962-112/aol-6/en-us/mail/PrintMessage.aspx>

9/17/2012

that you identify all possible titles. In the foregoing example, only a search of "oprah" will yield all results. Make certain to keep clicking on the "Find Next" prompt until all results have been identified.

**Identify your programs:** The list of titles generating royalties appears in the first of two columns. The second column is blank, and is for the purpose of indicating which programs you control. If you find a match for a title controlled by your company during 2000-2003, enter your company name in the cell to the right of the program title, i.e., in the second column. Please indicate if your company did not control the program for the entirety of 2000-03. For example, next to the claimed title, with your company name, indicate the years of control ("XYZ Company, 2000-01"). Once all of your company's claimed programs are identified on the Excel program, save the revised Excel spreadsheet, and email it back to us.

If you or someone at your company are absolutely uncomfortable working with Excel, then forward us a list of all your programs, and we will begin the search process ourselves.

Many of the recipients of this email are receiving it as the distributor of the programs owned by third parties. If your role was as the distributor, then include the programs controlled by your company as the distributor. Please do not ask us the value of the program or the expected royalties. At this juncture, we simply do not know and cannot venture an estimate until proceedings fully commence and we are able to see the universe of all other programs being claimed by all other claimants.

We are asking that an individual knowledgeable with catalogue respond as soon as possible, **but no later than Friday, January 6, 2012**. The sooner that we receive your response, however, the better we can represent your interests.

In closing, the proceedings before the U.S. Copyright Office have been a long time coming, and WSG is anxious to partake in them in order to receive the royalties justly due to WSG's represented claimants.

If you have any questions, please feel free to contact us at (210) 789-9084.

Sincerely,

Denise Vernon

Worldwide Subsidy Group LLC



# **EXHIBIT 96**

Excerpt of IPG "Item 27 - Responses to 2000-2003  
Lists of Titles (Jack Van Impe Ministries)"

ROYALTY-GENERATING TITLES

Dr. Jack Van Impe	Jack Van Impe Ministries
Jack Van Impe	Jack Van Impe Ministries
Jack Van Impe Presents	Jack Van Impe Ministries
\$1 Total Gym Trial Offer	
\$10 Million Dollar Challenge	
\$29.99 Epil Bronze With Therma Spa	
\$39 Price Clock	
\$39 Roll-out	
\$39 Rollout	
\$39.95 Revo	
\$49 F W Plus	
\$49 Forever White	
\$49 Forever White Plus	
\$49 Forward Plus	
\$49 FW Plus	
\$49 Plus	
\$9.95 Rich Dad	
\$9.95 Trial Fund	
\$9.95 Trial Offer	
\$99 No Brainer	
\$99 Yoga V2	
\$treet	
60s Gold	
70s: The Decade That Changed Television	
80s Classics	
80s With Martha Quinn	
Allo, 'Allo	
Allo, 'Allo!	
N Gear	
Til There Was You	
Twass the Night Before Christmas	
*Batteries not Included	
... ce soir on joue	
...And a Time to Heal: Reflections From Wedgwood Baptist Church	
...First Do No Harm	
340	

# **EXHIBIT 97**

RE: ERROR: ROYALTIES OWED for 2000-2003 cable and satellite retransmission roya... Page 1 of 1

Jack Van Impe Ministri  
-caldogme

From: Ken Vancil <kenv@jvim.com>

To: worldwidesg <worldwidesg@aol.com>

Subject: RE: ERROR: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Date: Tue, Feb 28, 2012 12:02 pm

Attachments: Copy\_of\_TITLES\_-\_2000-2003\_50k\_full.xls (4141K)

From: worldwidesg@aol.com [mailto:worldwidesg@aol.com]

Sent: Tuesday, February 28, 2012 12:45 PM

To: kenv@jvim.com

Subject: ERROR: ROYALTIES OWED for 2000-2003 cable and satellite retransmission royalties

Dear Mr./Ms. Ken Vancil,

You just received an email from us that attached a list of 50,000+ titles that are eligible for 2000-2003 cable retransmission royalties. Please note that we just discovered that the list inadvertently omitted the last several hundred titles. As such, please rely on the attached Excel file, rather than the Excel file provided to you earlier today.

If you have any questions, please feel free to contact us at (210) 789-9084.

Sincerely,

Denise Vernon

Worldwide Subsidy Group LLC



<http://mail.aol.com/35647-111/aol-6/en-us/mail/PrintMessage.aspx>

3/2/2012

RESTRICTED - Subject to Protective Order in Docket No. 2008-2 CRB CD  
2000-2003 (Phase II)

IPG 1066

2000-03 TITLES

TITLE	DISTRIBUTOR
Dr. Jack Van Impe	Jack Van Impe Ministries
Jack Van Impe	Jack Van Impe Ministries
Jack Van Impe Presents	Jack Van Impe Ministries
\$1 Total Gym Trial Offer	Jack Van Impe Ministries
\$10 Million Dollar Challenge	
\$10 Raise	
\$2 Bill	
\$20 Show	
\$29.99 Epil Bronze With Therma Spa	
\$39 Price Clock	
\$39 Roll-out	
\$39 Rollout	
\$39.95 Revo	
\$49 F W Plus	
\$49 Forever White	
\$49 Forever White Plus	
\$49 Forward Plus	
\$49 FW Plus	
\$49 Plus	
\$9.95 Rich Dad	
\$9.95 Trial Fund	
\$9.95 Trial Offer	
\$99 No Brainer	
\$99 Yoga V2	
Street	
'60s Gold	
'70s Groovin' in Detroit	
'70s The Decade That Changed Television	
'80s Classics	
'80s Retro TV Dance Party	
'80s With Martha Quinn	
'86 Mets Curtain Call	
'Allo, 'Allo	
'Allo, 'Allo!	
'N Gear	
'Neath Brooklyn Bridge	

# **EXHIBIT 98**

Excerpt of IPG "Item 29 - - Claimant Podcasts (Jack Van Impe Ministries)

id	date	time	day of week	call_sign	originatio n code	syndicatio n code	length	program type	phase 1 category	Unclaimed Broadcast	title	synopsis
5794996	10101		Monday	WMYD	S		30	27	Devotional		Dr. Jack Van Impe	
3775341	10101	130	Monday	KPLR	S		30	27	Devotional		Dr. Jack Van Impe	
4321742	10101	130	Monday	WDCA	S		30	27	Devotional		Dr. Jack Van Impe	
5726468	10601	2130	Saturday	WDTA	S		30	27	Devotional		Dr. Jack Van Impe	
5815064	10601	2200	Saturday	WPCB	S		30	27	Devotional		Dr. Jack Van Impe	
5734514	10601	2300	Saturday	WFMZ	S		30	27	Devotional		Dr. Jack Van Impe	
4957056	10701	530	Sunday	WPIX	S		30	27	Devotional		Dr. Jack Van Impe	
5092975	10701	700	Sunday	WRIC	S		30	27	Devotional		Dr. Jack Van Impe	
5730638	10701	730	Sunday	WEUX	S		30	27	Devotional		Dr. Jack Van Impe	
5881587	10701	800	Sunday	WTGS	S		30	27	Devotional		Dr. Jack Van Impe	
5537796	10701	830	Sunday	WYOU	S		30	27	Devotional		Dr. Jack Van Impe	
5413684	10701	830	Sunday	WVTV	S		30	27	Devotional		Dr. Jack Van Impe	
5143433	10701	830	Sunday	WSEE	S		30	27	Devotional		Dr. Jack Van Impe	
3385540	10701	830	Sunday	CKWS	S		30	27	Devotional		Dr. Jack Van Impe	
5815083	10701	1030	Sunday	WPCB	S		30	27	Devotional		Dr. Jack Van Impe	
4658490	10701	1100	Sunday	WKBN	S		30	27	Devotional		Dr. Jack Van Impe	
5734540	10701	2230	Sunday	WFMZ	S		30	27	Devotional		Dr. Jack Van Impe	
5663286	10701	2300	Sunday	WACY	S		30	27	Devotional		Dr. Jack Van Impe	
5786938	10701	2300	Sunday	WLMT	S		30	27	Devotional		Dr. Jack Van Impe	
5854925	10701	2300	Sunday	WQRF	S		30	27	Devotional		Dr. Jack Van Impe	
4369684	10701	2330	Sunday	WECT	S		30	27	Devotional		Dr. Jack Van Impe	
5877046	10701	2330	Sunday	WSYT	S		30	27	Devotional		Dr. Jack Van Impe	
5596776	10701	2330	Sunday	KBCW	S		30	27	Devotional		Dr. Jack Van Impe	
3743080	10701	2335	Sunday	KMSP	S		30	27	Devotional		Dr. Jack Van Impe	
5795275	10801		Monday	WMYD	S		30	27	Devotional		Dr. Jack Van Impe	
3775602	10801	130	Monday	KPLR	S		30	27	Devotional		Dr. Jack Van Impe	
4321985	10801	130	Monday	WDCA	S		30	27	Devotional		Dr. Jack Van Impe	
5726728	11301	2130	Saturday	WDTA	S		30	27	Devotional		Dr. Jack Van Impe	
5815335	11301	2200	Saturday	WPCB	S		30	27	Devotional		Dr. Jack Van Impe	
5734727	11301	2300	Saturday	WFMZ	S		30	27	Devotional		Dr. Jack Van Impe	
4957279	11401	530	Sunday	WPIX	S		30	27	Devotional		Dr. Jack Van Impe	
5093176	11401	700	Sunday	WRIC	S		30	27	Devotional		Dr. Jack Van Impe	

# **EXHIBIT 99**

From: Ken Vancil <kenv@jvim.com>  
To: worldwidesg <worldwidesg@aol.com>  
Subject: FW: Jack Van Impe Ministries; final broadcast verification  
Date: Fri, May 18, 2012 12:17 pm  
Attachments: Jack\_Van\_Impe\_Ministries.xls (863K)

Jack Van Impe  
-broadcast  
verification

Yes, these titles belong to our ministry.

From: worldwidesg@aol.com [mailto:worldwidesg@aol.com]  
Sent: Thursday, May 17, 2012 12:19 PM  
To: jvimi@jvim.com; kenv@jvim.com  
Subject: Jack Van Impe Ministries; final broadcast verification

Gentlemen,

we ABSOLUTELY need your response at this time.

Thanks,  
Denise

-----Original Message-----

From: worldwidesg <worldwidesg@aol.com>  
To: jvimi <jvimi@jvim.com>; kenv <kenv@jvim.com>  
Sent: Thu, May 10, 2012 8:35 pm  
Subject: Jack Van Impe Ministries; final broadcast verification

Dear Sir/Madam,

As the final step in our process of representing your company's claim to 2000-2003 U.S. cable retransmission royalties, we have identified each broadcast of the programs that you previously informed us were owned or controlled by your company. These broadcasts appear in the attached Excel spreadsheet.

In some instances, multiple programs appear with the same title. Nevertheless, the broadcast information oftentimes provides additional information regarding the identity of the program. Consequently, and in order to preserve the integrity of your claim and the claims of all represented producers, it is imperative that your company confirm that the broadcasts appearing on the attached Excel spreadsheet were owned or controlled by your company.

At this point we need you to do two things:

- 1) Immediately forward a reply email confirming your receipt of this email and its attachment. A simple response with the word "Received" will suffice. If we do not receive this reply we will need to continue emailing and calling you until the delivery of the email is confirmed.
- 2) Immediately review the attached list of titles and identify any broadcast of a program that was not owned or controlled by your company. This must be handled in the following manner: in the column immediately next to the program title, headed "Unclaimed Broadcast", place an "x" only if the particular broadcast is of a program for which the free tv rights were not owned or controlled by your company at the time of the broadcast.

From: Ken Vancil <kenv@jvim.com>  
To: worldwidesg <worldwidesg@aol.com>  
Subject: FW: Jack Van Impe Ministries; final broadcast verification  
Date: Fri, May 18, 2012 12:17 pm  
Attachments: Jack\_Van\_Impe\_Ministries.xls (863K)

---

Yes, these titles belong to our ministry.

From: [worldwidesg@aol.com](mailto:worldwidesg@aol.com) [<mailto:worldwidesg@aol.com>]  
Sent: Thursday, May 17, 2012 12:19 PM  
To: [jvimi@jvim.com](mailto:jvimi@jvim.com); [kenv@jvim.com](mailto:kenv@jvim.com)  
Subject: Jack Van Impe Ministries; final broadcast verification

Gentlemen,

we ABSOLUTELY need your response at this time.

Thanks,

Denise

—Original Message—

From: worldwidesg <worldwidesg@aol.com>  
To: [jvimi@jvim.com](mailto:jvimi@jvim.com); [kenv@jvim.com](mailto:kenv@jvim.com)  
Sent: Thu, May 10, 2012 8:35 pm  
Subject: Jack Van Impe Ministries; final broadcast verification

Dear Sir/Madam,

As the final step in our process of representing your company's claim to 2000-2003 U.S. cable retransmission royalties, we have identified each broadcast of the programs that you previously informed us were owned or controlled by your company. These broadcasts appear in the attached Excel spreadsheet.

In some instances, multiple programs appear with the same title. Nevertheless, the broadcast information oftentimes provides additional information regarding the identity of the program. Consequently, and in order to preserve the integrity of your claim and the claims of all represented producers, it is imperative that your company confirm that the broadcasts appearing on the attached Excel spreadsheet were owned or controlled by your company.

At this point we need you to do two things:

<http://mail.aol.com/36962-112/aol-6/en-us/mail/PrintMessage.aspx>

9/17/2012

- 1) Immediately forward a reply email confirming your receipt of this email and its attachment. A simple response with the word "Received" will suffice. If we do not receive this reply we will need to continue emailing and calling you until the delivery of the email is confirmed.
  
- 2) Immediately review the attached list of titles and identify any broadcast of a program that was not owned or controlled by your company. This must be handled in the following manner: in the column immediately next to the program title, headed "**Unclaimed Broadcast**", place an "x" only if the particular broadcast is of a program for which the free tv rights were not owned or controlled by your company at the time of the broadcast.

We are only a few weeks away from the filing of our direct case with the U.S. Copyright Office. Consequently, it is imperative that your company complete this task immediately. Failure to immediately respond could jeopardize your receipt of royalties, and we need your response no later than Tuesday, May 15, earlier if possible. We realize that this is a short time frame, however your cooperation is necessary as we are analyzing over eleven million broadcasts as part of our presentation.

Finally, allow me to remind you that this email contains highly proprietary information. Do not share this information with any third party, as doing so could potentially harm both your claim and the claims of several hundred other represented claimants.

Thank you for your immediate attention to this matter.

Denise Vernon

Worldwide Subsidy Group

# **EXHIBIT 100**

Salem Baptist  
-broadcast  
verification

From: Veronica Abney <vabney@sbcoc.org>

To: worldwidesg <worldwidesg@aol.com>

Subject: RE: Salem Baptist Church; final broadcast verification

Date: Thu, May 17, 2012 4:10 pm

Attachments: Salem\_Baptist\_Church\_of\_Chicago\_Inc\_Unclaimed\_5-17-12.xlsx (36K)

Attached is the revised list of the unclaimed Spreadsheet.

From: worldwidesg@aol.com [mailto:worldwidesg@aol.com]

Sent: Friday, May 11, 2012 1:21 PM

To: Veronica Abney; Denise A. Rogers

Subject: Salem Baptist Church; final broadcast verification

Dear Sir/Madam,

As the final step in our process of representing your company's claim to 2000-2003 U.S. cable retransmission royalties, we have identified each broadcast of the programs that you previously informed us were owned or controlled by your company. These broadcasts appear in the attached Excel spreadsheet.

In some instances, multiple programs appear with the same title. Nevertheless, the broadcast information oftentimes provides additional information regarding the identity of the program. Consequently, and in order to preserve the integrity of your claim and the claims of all represented producers, it is imperative that your company confirm that the broadcasts appearing on the attached Excel spreadsheet were owned or controlled by your company.

At this point we need you to do two things:

- 1) Immediately forward a reply email confirming your receipt of this email and its attachment. A simple response with the word "Received" will suffice. If we do not receive this reply we will need to continue emailing and calling you until the delivery of the email is confirmed.
- 2) Immediately review the attached list of titles and identify any broadcast of a program that was not owned or controlled by your company. This must be handled in the following manner: in the column immediately next to the program title, headed "Unclaimed Broadcast", place an "x" only if the particular broadcast is of a program for which the free tv rights were not owned or controlled by your company at the time of the broadcast.

We are only a few weeks away from the filing of our direct case with the U.S. Copyright Office. Consequently, it is imperative that your company complete this task immediately. Failure to immediately respond could jeopardize your receipt of royalties, and we need your response no later than Tuesday, May 15, earlier if possible. We realize that this is a short time frame, however your cooperation is necessary as we are analyzing over eleven million broadcasts as part of our presentation.

Finally, allow me to remind you that this email contains highly proprietary information. Do not share this information with any third party, as doing so could potentially harm both your claim and the claims of several hundred other represented claimants.

Thank you for your immediate attention to this matter.

Denise Vernon  
Worldwide Subsidy Group

# **EXHIBIT 400**

Excerpt of IPG "Item 30 - - Unclaimed Broadcasts (Salem Baptist Church)"

id	date	time	day_of_week	call_sign	originatio n code	syndicatio n code	length	program type	phase 1 category	Unclaimed Broadcast	title	synopsis
8508694	102002	5	Sunday	WBTV	L		30	27	Devotional	X	Greater Salem Church	With Anthony Jinwright
8508901	102702	5	Sunday	WBTV	L		30	27	Devotional	X	Greater Salem Church	With Anthony Jinwright
8509105	110302	5	Sunday	WBTV	L		30	27	Devotional	X	Greater Salem Church	With Anthony Jinwright
8509306	111002	5	Sunday	WBTV	L		30	27	Devotional	X	Greater Salem Church	With Anthony Jinwright
8509510	111702	5	Sunday	WBTV	L		30	27	Devotional	X	Greater Salem Church	With Anthony Jinwright
8509710	112402	5	Sunday	WBTV	L		30	27	Devotional	X	Greater Salem Church	With Anthony Jinwright
8509897	120102	5	Sunday	WBTV	L		30	27	Devotional	X	Greater Salem Church	With Anthony Jinwright
8510130	120902	39	Monday	WBTV	L		30	27	Devotional	X	Greater Salem Church	With Anthony Jinwright
8510311	121502	5	Sunday	WBTV	L		30	27	Devotional	X	Greater Salem Church	With Anthony Jinwright
8510518	122202	5	Sunday	WBTV	L		30	27	Devotional	X	Greater Salem Church	With Anthony Jinwright