

PHASE I

The Music Claimants have not reached a settlement with any other Phase I claimant group regarding the distribution of any portion of the 2013 satellite royalty funds. Accordingly, a Phase I controversy exists regarding the distribution of the Music Claimant share of such funds.

PHASE II

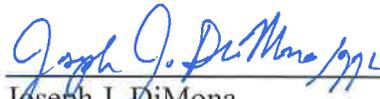
No individual Music Claimant Party has reached a settlement with any other Music Claimant Party regarding the distribution of any portion of the 2013 satellite royalty funds. Accordingly, a Phase II controversy regarding the distribution of such funds currently exists between each of ASCAP, BMI and SESAC. The Settling Music Claimants are unaware of any other Phase II controversies in the Music Claimant category. If an unanticipated Phase II claim to 2013 satellite royalty funds is made in the Music Claimant category, a Phase II controversy would exist with regards to the claim filed by such party.

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of January, 2015, a copy of the foregoing Comments of ASCAP, BMI and SESAC on the Existence of Controversies was sent by FedEx overnight delivery to the following:

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