

Nos. 16-56057 & 16-56287

**UNITED STATES COURT OF APPEALS FOR
THE NINTH CIRCUIT**

Michael Skidmore, as Trustee for the Randy Craig Wolfe Trust,
Plaintiff, Appellant and Appellee,

v.

Led Zeppelin *et al.*, *Defendants*
and Appellees, and
Warner/Chappell Music, Inc.,
Defendant, Appellee and Appellant.

On Appeal from the United States District Court for the
Central District of California
The Honorable R. Gary Klausner
No. 15-cv-03462 RGK (AGR_x)

**Motion for Leave to File Reply Brief *Amicus Curiae* of
The Pullman Group, LLC and
Structured Asset Sales, LLC,**

in Support of Plaintiff-Appellant on *En Banc* Rehearing

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MOTION

1. *Amici* The Pullman Group, LLC and Structured Asset Sales, LLC seek to file this on point reply amicus brief in support of Plaintiff-Appellant on *en banc* rehearing, and in reply to the response filed by Defendant-Appellees on September 9, 2019 (Dkt. 150-2). *Amici* request that the Court graciously grant them the courtesy of an extension of time to accept this brief which will aid the Court.

2. Plaintiff-Appellant's counsel has consented to the filing of this brief. Counsel for *amici* attempted without success to obtain consent from Defendants-Appellees' counsel.

3. Structured Asset Sales, LLC is a Limited Liability Company, which invests in and owns rights to thousands of songs and musical compositions and is owned by David Pullman, based in Los Angeles, California who is its Founder, Chairman and CEO, as well as the Founder, Chairman and CEO of The Pullman Group, LLC, the creator of all Pullman Bonds, the first ever music, entertainment and intellectual property including copyright asset backed securitizations of any kind in history including the world famous financial landmark \$55 million transaction rated single-A level by multiple ratings agencies Pullman Bond for David Bowie, and Pullman Bond series for the Motown Hit Machine, Holland Dozier Holland, R & B Royalty, Ashford & Simpson, The Godfather of Soul,

James Brown and The Isley Brothers, among others backed by copyrights worth hundreds of millions of dollars. See www.pullmanbonds.com.

4. Structured Asset Sales, LLC is a beneficial owner of one-third of all of the copyright rights of the catalog of songwriter Edward Townsend, including the musical composition “Let’s Get it On.” “Let’s Get it On” was written and produced by Townsend and Marvin Gaye in 1973, registered internationally in 1973, and renewed with the United States Copyright Office in 2000.

5. *Amici* have an interest in maintaining the broad protection granted under the Copyright Act to the copyrighted works they own and in which they invest, including “Let’s Get it On.”

6. For this reason, proposed *amici* believe that this reply brief would be useful to this Court’s deliberations, and they therefore seek this Court’s leave to file the brief.

Respectfully Submitted,

s/ W. Michael Hensley
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Attorney for *Amici Curiae*
The Pullman Group, LLC and
Structured Asset Sales, LLC

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing Motion for Leave to File Reply Brief *Amicus Curiae* with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system on September 13, 2019.

All participants in the case are registered CM/ECF users, and will be served by the appellate CM/ECF system.

Dated: September 13, 2019

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