

January 13, 2023

BY EMAIL

Michael D. Hobbs, Jr.
John M. Bowler
Sam Hatcher
Troutman Pepper Hamilton
Sanders LLP
600 Peachtree Street, N.E., Suite 3000
Atlanta, GA 30308

Thomas H. Lee
Frost Brown Todd LLC
150 3rd Avenue South, Suite 1900
Nashville, TN 37201

Janet M. Kleinfelter
James P. Urban
Kevin M. Kreutz
Office of the Attorney General
P.O. Box 20207
Nashville, TN 37202

Re: Public.Resource.org *et al.* v. Matthew Bender & Co. *et al.*

Dear Counsel:

It has recently come to our client's attention that, in January 2021, the U.S. Copyright Office rejected your clients' application for copyright registration for the Tennessee Code Annotated. See the enclosed correspondence from the Copyright Office.

This seems inconsistent with your clients' repeated assertions in this litigation that the State of Tennessee holds a copyright on the Tennessee Code Annotated.

Would you please explain to us how those assertions are accurate in light of this apparent 2021 decision by the Copyright Office?

Attorneys at Law

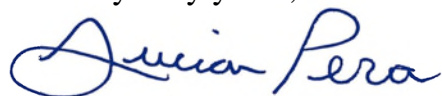
Alabama
Colorado
Florida
Georgia
Louisiana
Mississippi
North Carolina
South Carolina
Tennessee
Texas
Washington, DC

Lucian T. Pera

Direct: 901.524.5278
E-Fax: 901.524.5378
lucian.pera@arlaw.com

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in blue ink that reads "Lucian Pera". The signature is written in a cursive style with a large initial 'L' and a long, sweeping underline.

Lucian T. Pera

c: Joshua Counts Cumby



United States Copyright Office

Library of Congress · 101 Independence Avenue SE · Washington, DC 20559-6000 · www.copyright.gov

December 23, 2022

Carl Malamud
carl@media.org
95 Kennedy Lane
Healdsburg, CA 95448

Our Reference: SR: 1-11997673375

Our search in the appropriate Copyright Office In-process Files under the names Claudia Gurevich and Jimmy Nguyen and the titles TENNESSEE CODE ANNOTATED 2020 SUPPLEMENT VOLUMES 1-12B, INDEX (35 PKGS), TENNESSEE CODE ANNOTATED 2020 REPLACEMENT VOLUMES 3A, 8A, 9, 9A, 9D, JUDICIAL COUNCIL OF CALIFORNIA CIVIL JURY INSTRUCTIONS (CACI) 2019 EDITION (2 VOLS), JUDICIAL COUNCIL OF CALIFORNIA CRIMINAL JURY INSTRUCTIONS 2020 EDITION (2 VOLS.), JUDICIAL COUNCIL OF CALIFORNIA CIVIL JURY INSTRUCTIONS (CACI) 2020 EDITION (2 VOLS), and JUDICIAL COUNCIL OF CALIFORNIA CIVIL JURY INSTRUCTIONS 2020 EDITION (2 VOLS.) disclosed receipt of the following records identified under these names and specific titles and further identified these cases as being rejected.

In-Process Number:	SR 1-10054382706
Priority:	3- Routine
Reminders:	refuse - code commish
Date Received:	January 8, 2021
Contacts:	Claudia Gurevich
Title:	TENNESSEE CODE ANNOTATED 2020 SUPPLEMENT VOLUMES 1-12B, INDEX (35 PKGS)
Services Request Sub Type:	TX
Certified By:	Claudia Gurevich
Status:	Closed
Registration Decision:	Rejected
Registration Decision Date:	January 26, 2021

In-Process Number:	SR 1-10037852652
Priority:	3- Routine
Reminders:	refuse
Date Received:	January 3, 2021
Contacts:	Claudia Gurevich
Title:	TENNESSEE CODE ANNOTATED 2020

REPLACEMENT VOLUMES 3A, 8A, 9,
9A, 9D
Services Request Sub Type: TX
Certified By: Claudia Gurevich
Status: Closed
Registration Decision: Rejected
Registration Decision Date: January 26, 2021

In-Process Number: SR 1-9998654395
Priority: 3- Routine
Reminders:
Date Received: December 21, 2020
Contacts: Jimmy Nguyen
Title: JUDICIAL COUNCIL OF CALIFORNIA
CIVIL JURY INSTRUCTIONS (CACI)
2019 EDITION (2 VOLS)

Services Request Sub Type: TX
Certified By: Jimmy Nguyen
Status: Closed
Registration Decision: Rejected
Registration Decision Date: November 5, 2021

In-Process Number: SR 1-885240321 1
Priority: 3- Routine
Reminders: refuse
Date Received: May 5, 2020
Contacts: Claudia Gurevich
Title: JUDICIAL COUNCIL OF CALIFORNIA
CRIMINAL JURY INSTRUCTIONS 2020
EDITION (2 VOLS.)

Services Request Sub Type: TX
Certified By: Claudia Gurevich
Status: Closed
Registration Decision: Rejected
Registration Decision Date: July 1, 2021

In-Process Number: SR 1-9636408546
Priority: 3- Routine
Reminders: E-mailed 4/14/21
Date Received: October 27, 2020
Contacts: Jimmy Nguyen
Title: JUDICIAL COUNCIL OF CALIFORNIA
CIVIL JURY INSTRUCTIONS (CACI)
2020 EDITION (2 VOLS)

Services Request Sub Type: TX

Certified By: Jimmy Nguyen
Status: Closed
Registration Decision: Rejected
Registration Decision Date: November 5, 2021

In-Process Number: SR 1-9067528302
Priority: 3- Routine
Reminders: HOLD - CORRES sent 7/01, wmfh v auth
Date Received: July 28, 2020
Contacts: Claudia Gurevich
Title: JUDICIAL COUNCIL OF CALIFORNIA
CIVIL JURY INSTRUCTIONS 2020
EDITION (2 VOLS.)
Services Request Sub Type: TX
Certified By: Claudia Gurevich
Status: Closed
Registration Decision: Rejected
Registration Decision Date: July 1, 2021

The additional information related to these cases 1-9067528302, 1-9636408546, 1-8852403211, 1-9998654395, 1-10037852652 and 1-10054382706 may be contained within correspondence records, the application, and the deposit. You may submit a request for copies via email at copycerts@loc.gov.

Your credit card has been charged a total of \$400.00, in payment for this search.

Tali Raphael
Copyright Records Specialist
Records Research and Certification Section
United States Copyright Office