Response from Michael Bloom Regarding Claimant's Request for Reconsideration

I, Michael Bloom, respectfully submit this response to Claimant Lahna Turner’ s request for reconsideration of the January 6, 2025, Final Determination by the Copyright Claims Board. I assert that the Board's findings were correct and well-supported by the law and evidence. The Claimant's argument that the Board raised co-authorship as a new issue after her reply and restricted her from further submissions is unfounded. The Board’ s inquiry into my potential status as a co-author was necessary, given my role as the director of "Just Correct." Furthermore, the decision to limit submissions to documentary evidence was a procedural choice aimed at focusing on the relevant contractual agreements.

I maintain that the Final Determination accurately applied the standards of co-authorship as defined by the Copyright Act and relevant judicial precedent. The Claimant’ s failure to provide adequate evidence to refute my established ownership and contributions does not constitute a clear error of law or fact. The legal principles cited by Turner, particularly regarding the burdens of proof and the nature of co-authorship, were correctly interpreted by the Board. My designation as a co-author aligns with the collaborative nature of the work and the intentions demonstrated by all parties involved. Therefore, I respectfully request that the Board uphold its Final Determination and deny Turner ’ s request for reconsideration, as no substantial errors have been demonstrated.