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July 21, 2026

Copyright Claims Board Docket No. 24-CCB-0263

Cade J. Campbell, Claimant,
v.
Dallas County Historical Foundation d/b/a The Sixth Floor Museum at Dealey Plaza,
Respondent.

CLAIMANT'S REQUEST FOR REVIEW BY THE REGISTER OF COPYRIGHTS

I. Introduction

Claimant Cade J. Campbell respectfully requests review by the Register of Copyrights of the Copyright Claims Board's July 17, 2026 Order Denying Request for Reconsideration.

This request is narrow. Claimant does not ask the Register to reweigh the entire factual record, conduct a new trial, or decide ownership in the first instance. Claimant asks the Register to review whether the Board abused its discretion in denying reconsideration without addressing a timely procedural and technical concern raised before the denial order: whether the Keya Morgan recording, previously identified in Claimant's exhibit materials, produced to Respondent during discovery, and discussed in Claimant's Request for Reconsideration, was accepted into eCCB as a playable media exhibit.

The legal question presented is precise. Claimant's Request for Reconsideration was directed to clear material error and technical mistake under 17 U.S.C. § 1506(w) and 37 C.F.R. §§ 230.1-230.2. The Board denied reconsideration as repetition, but the denial order did not address Claimant's July 15, 2026 procedural concern regarding whether the previously identified and served Keya Morgan recording had been accepted into eCCB as a playable exhibit. Register review is therefore proper under 17 U.S.C. § 1506(x) and 37 C.F.R. § 231.2, and is limited to whether the Board abused its discretion in denying reconsideration.

Claimant does not ask the Register to decide whether Jack Jordan or Jack Titus took the photograph, to reweigh the factual record, or to substitute a new ownership determination.

Claimant also does not contend that anyone 'broke the law' in the colloquial sense. The question is whether denial without addressing that timely record-status concern was an abuse of discretion under 37 C.F.R. § 231.5.

Claimant does not contend that the Keya Morgan recording, standing alone, disproves Respondent's Titus / Nancy Titus provenance theory or establishes Claimant's ownership. Its relevance is narrower. The Board used the Keya Morgan evidence as part of its ownership and provenance analysis. Once that issue became part of the Board's reasoning, it mattered whether the Board had access to the recording itself as a playable exhibit, or only written references to it. Claimant's July 15, 2026 email raised that procedural and technical concern before the Board denied reconsideration. The July 17, 2026 denial order does not address it.

II. Procedural Background

The Board issued its Final Determination on May 27, 2026. Claimant filed a timely Request for Reconsideration on June 26, 2026. Before Respondent filed its response, and before the Board denied reconsideration, Claimant sent a procedural clarification email to the CCB on July 15, 2026, copying Respondent's counsel. Respondent filed its response on July 16, 2026. The Board denied reconsideration on July 17, 2026.

In the July 15 email, Claimant explained that the Keya Morgan recording had been identified in Claimant's exhibit materials as part of Exhibit 6 / Exhibit 6A and had also been produced to Respondent's counsel during discovery. Claimant asked whether any formal notice, corrected exhibit submission, request, or other procedural clarification was appropriate because Claimant was uncertain whether the media file itself had been accepted into eCCB as a playable exhibit. See Exhibit A. Claimant's uncertainty arose after reviewing the Final Determination's treatment of the Keya Morgan evidence, which caused Claimant to question whether the Board had reviewed the recording itself or only written references to it.

The Keya Morgan issue was not a late-created issue. It appeared in Claimant's 2025 exhibit materials as Exhibit 6 / Exhibit 6A; the recording was produced to Respondent's counsel during discovery; and Claimant also addressed the Keya Morgan issue in his Request for Reconsideration. The July 15, 2026 email was not an attempt to introduce a new subject. It was a procedural request to clarify whether the previously identified, previously served, and previously discussed recording had been accepted into eCCB as a playable media exhibit. See Exhibits C, D, and F.

The July 17 denial order does not address that July 15 procedural concern. The order states that Claimant's Request repeated prior arguments and did not demonstrate clear error of law, clear error of material fact, or a technical mistake. The order also states that the Final Determination was 'not a close question of fact or law,' that Respondent's evidence was 'overwhelming and highly credible,' and that any presumption from Claimant's registration was 'easily overcome.' The order further states that the evidence showed the Museum received the Work from the widow of the 'actual photographer.' See Exhibit E.

III. Governing Law and Standard for Register Review

The reconsideration standard is set by statute and regulation. Section 1506(w) of Title 17 permits a party to request reconsideration if the party identifies 'a clear error of law or fact material to the outcome, or a technical mistake.' 17 U.S.C. § 1506(w). The Copyright Office regulations repeat that standard. 37 C.F.R. § 230.1; 37 C.F.R. § 230.2.

Section 230.2 further provides that a reconsideration request must be specific as to the purported error or technical mistake and shall not merely repeat arguments already made to the Board. 37 C.F.R. § 230.2. Claimant's position is that the July 15 record-status concern was not a mere repetition of earlier argument. It was a specific technical and procedural question about whether

a previously identified and served media file had been accepted into eCCB as playable evidence before the Board ruled on reconsideration.

Register review is also governed by statute and regulation. If the Board denies reconsideration, the party who requested reconsideration may request review by the Register of Copyrights within 30 days after the denial. 17 U.S.C. § 1506(x); 37 C.F.R. §§ 231.1-231.2. The request must be no more than 12 pages, must meet the formatting requirements of 37 C.F.R. § 220.5(b), must include the reasons the party believes there was an abuse of discretion in denying reconsideration, and must be accompanied by the filing fee set forth in 37 C.F.R. § 201.3(g)(3). 37 C.F.R. § 231.2.

The Register's review is limited to whether the Board abused its discretion in denying reconsideration. 37 C.F.R. § 231.5. If review is granted, the Register may deny the request or remand the proceeding to the Board for reconsideration of specified issues and for issuance of an amended final determination. 37 C.F.R. § 231.6.

Claimant also recognizes the no-new-evidence rule. 37 C.F.R. § 231.4. The attached transcript, public access URL, and related exhibit references are provided to identify and locate the same Keya Morgan recording previously identified in Claimant's exhibit materials, produced to Respondent's counsel during discovery, and discussed in reconsideration. They are not offered as a new merits theory or as new evidence asking the Register to decide ownership from the YouTube page.

IV. The Board Abused Its Discretion by Denying Reconsideration Without Addressing the July 15 Procedural and Technical Issue

The July 15, 2026 email raised a procedural and technical record issue. It did not ask the Board to accept surprise evidence. It did not attach the recording as a new merits submission. It asked how to clarify whether a previously identified and served exhibit had actually been accepted into eCCB as a playable media file.

That distinction is important.

If the recording was properly accepted into eCCB and available to the Board, then the record can be clarified accordingly.

If the recording was not accepted into eCCB as a playable file, then the Board may have evaluated the Keya Morgan issue without the actual recording itself.

The denial order does not address either possibility. It does not state that the recording was available. It does not state that the recording was unavailable but immaterial. It does not state that Claimant's July 15 procedural inquiry was procedurally improper. It simply denies reconsideration without discussing the issue.

Because 17 U.S.C. § 1506(w) and 37 C.F.R. §§ 230.1-230.2 expressly recognize technical mistake as a basis for reconsideration, Claimant respectfully submits that the Board should have addressed the record-status concern before denying reconsideration. The issue was specific, timely raised before the denial order, and directed to the status of a previously identified exhibit. Denying reconsideration without addressing that concern was an abuse of discretion under 37 C.F.R. § 231.5.

The Board characterized the Request for Reconsideration as repeating prior arguments. This request does not ask the Register to revisit every evidentiary issue from reconsideration. It identifies the point the denial order did not address: the July 15, 2026 record-status concern regarding the Keya Morgan recording.

V. The Keya Morgan Recording Was Material to the Ownership and Provenance Analysis

The Keya Morgan evidence was not peripheral. The Final Determination used the Keya Morgan communications in evaluating ownership and provenance. Claimant's Request for Reconsideration also addressed the Keya Morgan issue because Claimant believed the Board had

treated the pre-purchase negotiation as evidence undermining ownership without considering its full context.

The recording is significant because Morgan did not merely discuss buying a physical print. He discussed a rights-bearing transaction and the need for copyright paperwork. According to the transcript, Morgan suggested that Claimant could first buy the photograph himself, after which Morgan could buy it from Claimant, stating that 'then you own it' and 'then everything is completely legal.' Morgan also stated that he needed 'something signed from someone that says I own the copyright,' explaining, 'This is a specific thing. It's called the copyright.' He further stated, 'if he owns the copyright, I have to get it registered under my personal name. Me. Keya Morgan.' Later, Morgan summarized the contemplated chain by stating, 'He'll give everything to you and then you legally own it.' Claimant also stated during the call, 'I'm the middle man. I'm the middle man in this.' See Exhibit B-1.

These statements are material because they show that the November 2013 negotiations concerned copyright transfer and chain of title, not merely the purchase of an old physical photograph. They also show that Claimant was not presenting himself as the existing owner before Ron Jordan's later transfer; he was acting as an intermediary in a contemplated rights transaction involving Ron Jordan.

A public access locator for the same Keya Morgan recording is https://www.youtube.com/watch?v=JUYHrt6tPC8. Claimant does not provide this URL as a new evidentiary theory or as a substitute for the recording previously identified in Claimant's exhibit materials and produced to Respondent. Claimant provides the URL only to identify and locate the same recording whose playable eCCB status remains the procedural issue presented here. See Exhibits B-1 and B-2.

Claimant is not asking the Register to decide ownership based on the Keya Morgan recording. Claimant asks only that the Register review whether the Board abused its discretion by denying reconsideration without addressing whether this previously identified, previously served, and previously discussed recording was part of the playable eCCB record.

VI. The Recording's Relevance Is Procedural Even If the Board Credited Respondent's Titus / Nancy Titus Provenance Theory

Claimant recognizes that the Board found Respondent's provenance evidence persuasive and credited Respondent's theory that the Museum received the Work from Nancy Titus as part of a Titus collection. Claimant also recognizes that the Keya Morgan recording, by itself, does not disprove that theory.

But the issue here is not whether the Keya Morgan recording alone defeats Respondent's provenance evidence. The issue is whether the Board abused its discretion by denying reconsideration without addressing a timely record-status concern about evidence the Board itself treated as part of the ownership and provenance history.

The Keya Morgan recording bears on the pre-dispute Jordan-chain context. It tends to show that, before Claimant knew of Respondent's Titus theory, a third-party collector was treating Ron Jordan's photograph as a rights-bearing work requiring copyright paperwork. That does not decide the entire case. But it is directly relevant to the way the Board assessed the 2013 transaction, Ron Jordan's role, and Claimant's later chain-of-title evidence.

Because the Board used the Keya Morgan episode in the ownership analysis, Claimant respectfully submits that the Board should have addressed whether the recording itself was available as a playable exhibit before denying reconsideration.

VII. The Request for Reconsideration Raised Category Errors, Not Merely Dissatisfaction With the Result

Claimant recognizes that the Board characterized the Request for Reconsideration as repeating prior arguments. Claimant respectfully submits that this characterization overlooked the nature of the reconsideration request.

Claimant's Request did not merely argue that the Board should have 'believed Claimant more.' It argued that the Final Determination treated certain categories of evidence as bearing more authorship and provenance weight than those categories could logically or legally support.

For example, Claimant argued that copy history is not the same as authorship history; that possession or institutional collection placement is not the same as creation; that a print date does not itself identify the photographer; that a wider copy does not, by itself, establish who pressed the shutter; and that a collection label or donation document is provenance evidence, not independent proof that the named donor's deceased spouse authored each image in a disputed sequence.

Claimant raised these issues because the disputed issue was not merely whether copies existed in different places. The disputed issue was whether Respondent had rebutted Claimant's registration, Ron Jordan's notarized Affidavit of Fact, and Ron Jordan's notarized Bill of Sale by a preponderance of the evidence. Claimant raised these issues because the Board's conclusion depended not only on whether Respondent possessed a competing provenance narrative, but whether that narrative legally and factually overcame Claimant's registered chain of title.

The broader issues raised in reconsideration - including Ron Jordan's affidavit and Bill of Sale, the April 1964 print date, the absence of a negative, the unmounted slide, the Titus sequence, third-party prints, Love Field visual evidence, the S. Winters / Great Western Finance attribution issue, and the Gift Agreement / collection-label distinction - remain relevant here only to show why a complete and clear record mattered. Claimant does not ask the Register to reweigh those

issues. Claimant asks review of the Board's denial of reconsideration without addressing the specific Keya Morgan record-status concern.

The Board's denial order states that the 'totality of the evidence' favored Respondent and that the registration presumption was 'easily overcome.' But the order does not address Claimant's July 15 procedural concern about whether the Board's review of the Keya Morgan issue included the recording itself.

VIII. The Board's Use of "Actual Photographer" Language Shows Why the Record-Status Issue Matters

The denial order states that the evidence was 'overwhelming and highly credible' that the Museum received the Work from the widow of the 'actual photographer.'

Claimant respectfully submits that this language underscores the importance of a complete and clear record. The identity of the actual photographer was the central disputed issue. Claimant's position was that Respondent's evidence showed collection history, possession, and circulation, but did not independently establish authorship strongly enough to overcome Claimant's registration and notarized chain-of-title documents. Both provenance chains depended on deceased individuals, family provenance, and later documents; the concern is not that the Board credited one chain over the other, but that the denial order treated Respondent's disputed authorship theory as the chain of the 'actual photographer' while treating Claimant's chain of title as merely purported.

The Keya Morgan recording does not settle the identity of the photographer. But it is part of the ownership and provenance record the Board discussed. If the Board relied on the Keya Morgan episode while not having the recording itself available as a playable exhibit, then reconsideration should not have been denied without addressing that technical concern.

IX. Requested Relief

Claimant respectfully requests that the Register find that the Board abused its discretion under 37 C.F.R. § 231.5 by denying reconsideration without addressing Claimant's timely July 15, 2026 procedural concern regarding the Keya Morgan recording.

Claimant respectfully requests that the Register remand the matter to the Board under 37 C.F.R. § 231.6 for the limited purpose of addressing:

1. whether the Keya Morgan recording was accepted into eCCB as a playable media exhibit;

2. whether the Board reviewed the recording itself, as opposed to written references to it;

3. whether any technical correction, docket clarification, or limited record correction is appropriate regarding Exhibit 6 / Exhibit 6A; and

4. whether the Board's reconsideration denial should be amended or reconsidered in light of that record-status clarification.

Claimant does not request a general rehearing, a wholesale reweighing of the evidence, or a ruling that the Keya Morgan recording proves ownership. Claimant requests only limited review of whether the Board abused its discretion by denying reconsideration without addressing the July 15, 2026 procedural concern regarding whether the previously identified, previously served, and previously discussed Keya Morgan recording was accepted into eCCB as a playable exhibit.

Respectfully submitted,

/s/ *Cade J. Campbell*
Cade J. Campbell
Claimant, pro se
5820 CR 1022
Joshua, TX 76058
entertainmenthistoryllc@gmail.com

Date: July 21, 2026

Certificate of Service

I certify that on July 21, 2026, I filed this Request for Review by the Register of Copyrights through eCCB and served a true and correct copy on Respondent's counsel through the eCCB service system and/or by the method required by the Copyright Claims Board.

/s/ ***Cade J. Campbell***
Cade J. Campbell
Claimant, pro se

Exhibit List

Exhibit A: July 15, 2026 Email to the CCB and Respondent's Counsel

Purpose: Shows that Claimant raised the Keya Morgan record-status concern before the Board denied reconsideration on July 17, 2026, and that Respondent's counsel was copied on the procedural inquiry.

Exhibit B-1: Transcript of Previously Identified Exhibit 6 / 6A Keya Morgan Recording

Purpose: Shows why the playable-file issue was material. The transcript is offered to explain the previously identified Keya Morgan recording, not as a new merits submission asking the Register to decide ownership from the transcript.

Exhibit B-2: Public-Access YouTube Page Screenshot / Public Access Locator

Purpose: Shows the public-access locator for the same Keya Morgan recording. It is offered to identify and locate the previously identified recording, not as a new merits submission or as a substitute for the eCCB media file.

Exhibit C: Exhibit List / Exhibit Table Identifying Exhibit 6 / 6A as the Keya Morgan Recording

Purpose: Shows that the Keya Morgan recording was previously identified in Claimant's exhibit materials and was not a surprise item first raised after the Final Determination.

Exhibit D: April 3, 2025 Email Producing the Recording to Respondent's Counsel

Purpose: Shows that Respondent had the Keya Morgan recording during discovery, before the Final Determination and before reconsideration.

Exhibit E: July 17, 2026 Order Denying Request for Reconsideration

Purpose: Shows that the denial order did not address Claimant's July 15, 2026 procedural concern about whether the actual Keya Morgan recording had been accepted into eCCB as a playable media exhibit.

Exhibit F: Excerpt from Claimant's June 26, 2026 Request for Reconsideration

Purpose: Shows that the Keya Morgan issue was not newly raised after reconsideration. Claimant's Request for Reconsideration expressly argued that the Board materially misread the Keya Morgan evidence and used negotiation context as ownership weakness.

Proof of Delivery

I hereby certify that on Tuesday, July 21, 2026, I provided a true and correct copy of the Claimant's Request for Review by the Register of Copyrights to the following:

Dallas County Historical Foundation AKA Sixth Floor Museum at Dealey Plaza, represented by Kara Anderson, served via ESERVICE at kara.foister@troutman.com

Signed: /s/ Cade J Campbell