COPYRIGHT CLAIMS BOARD

Docket number: 26-CCB-0723
November 19, 2026

Sinclair Communications, LLC	*v.*	Steven Bryant
CLAIMANT		**RESPONDENT**

ORDER TO SHOW CAUSE REGARDING BAD-FAITH CONDUCT

"A claimant, including a corporate claimant's parents, subsidiaries, and affiliates, shall file no more than 30 proceedings in any 12-month period" before the Copyright Claims Board. 37 C.F.R. § 233.2(a)(1); *see* 17 U.S.C. § 1504(g). Claims count toward that numerical limitation as soon as they are filed. 37 C.F.R. § 233.2(a). This proceeding exceeds that limitation.

Richard Bales (Bales) filed this claim on behalf of Sinclair Communications, LLC (Claimant) on November 18, 2026. Bales has filed thirty-three proceedings before the Board on behalf of Sinclair, Inc. in the last twelve months, starting with *Sinclair, Inc. v. Pellegrino*, Claim No. 25-CCB-0551, filed on December 16, 2025. Claimant is a subsidiary of Sinclair, Inc. *See* Sinclair, Inc., Form 10-K, Exhibit 21 (List of Subsidiaries) (Feb. 27, 2026), https://www.sec.gov/Archives/edgar/data/912752/000197121326000012/exhibit21-q42025subsidiari.htm.

The Board notified Bales and Sinclair, Inc. of its thirty-claim limit in several other proceedings. *See* **Order to Amend Noncompliant Claim**, *Sinclair, Inc. v. Harmon*, Claim No. 26-CCB-0509 (Aug. 28, 2026); **Order to Amend Noncompliant Claim**, *Sinclair, Inc. v. Harmon*, Claim No. 26-CCB-0515 (Aug. 28, 2026). Less than two weeks ago, the Board dismissed Sinclair, Inc.'s last three proceedings because they exceeded the thirty-claim limit. *See* **Order Dismissing Claim Without Prejudice**, *Sinclair, Inc. v. Daughtry*, Claim No. 26-CCB-0698 (Nov. 6, 2026); **Order Dismissing Claim Without Prejudice**, *Sinclair, Inc. v. Akinsegun*, Claim No. 26-CCB-0700 (Nov. 6, 2026); **Order Dismissing Claim Without Prejudice**, *Sinclair, Inc. v. Rivera*, Claim No. 26-CCB-0701 (Nov. 6, 2026). Those three dismissal orders specifically stated that "to comply with the limitation on Board proceedings, Claimant may not file any claims in this forum before December 16, 2026." *See id.* Bales' choice to file this claim not through Sinclair, Inc. but through its subsidiary fares no better. Along with the other claims filed by Claimant's parent Sinclair, Inc. in the last twelve months, this is just another claim over the thirty-claim limit.

Before submitting a claim, filers are asked to certify under penalty of perjury that the information provided in the claim is accurate and truthful to the best of their knowledge. *See* **37 C.F.R. § 222.2(c)(12)**. As in Sinclair, Inc.'s previous claims before the Board, this claim alleges copyright infringement of a motion picture or audiovisual work: a television news segment. In this claim the work is titled "Suspect charged with murder tells KFDM shooting was accidental." Bales and Claimant state that the work "is available on the YouTube channel for KFDM, a television broadcast station operated by Sinclair Communications, LLC." Their assertion that Claimant operates KFDM

seems to be untrue; instead, KFDM appears to be operated by Sinclair, Inc. or by its other subsidiary, Sinclair Broadcasting Group, LLC (SBGL). KFDM's website states "KFDM is a TX based station and CBS Television and FOX affiliate, which is owned and operated by Sinclair Broadcast Group." **https://kfdm.com/station/contact.** Sinclair, Inc. is SBGL's parent company, according to their jointly-filed SEC Form 10-K, which lists KFDM among the television stations that their "local media segment owns and operates or provides programming and/or sales and other shared services to." Sinclair, Inc., Form 10-K, pp. 3 & 8-9, **https://www.sec.gov/Archives/edgar/data/1971213/000197121326000012/sbgi-20251231.htm**. By contrast, Claimant seems to operate radio stations, not television stations. Its website homepage describes Claimant as a "rarity in the world of modern radio," displays a list of five radio station logos, and states: "The stations listed on this page reflect the ownership interests of Sinclair Communications." *See* **https://sinclairstations.com/**.

No reasonable basis is apparent for asserting in the claim that Claimant operates KFDM, or for identifying Claimant, both in the claim and in an application for copyright registration that Bales submitted on the same day, as the author of the allegedly infringed work. It appears that Bales, despite having been notified that Sinclair, Inc. had exceeded the thirty-claim limit and could not file another claim this month, sought to get around that prohibition by filing this claim and applying for registration on Claimant's behalf, and by misstating Claimant's relationship to the allegedly infringed work.

Accordingly, the Board orders Bales, Claimant, and Sinclair, Inc. to show cause why continuing to file claims that violate the Board's standard limitation on proceedings filed in a twelve-month period, filing this claim on behalf of Claimant, and identifying Claimant as the author of the work and the operator of KFDM, do not constitute bad-faith conduct under **37 C.F.R. § 232.3**.

Whenever a claimant submits materials or advocates a position before the Board, they certify to the best of their "knowledge, information, and belief, formed after a reasonable inquiry under the circumstances," that:

(a) It is not being presented for any improper purpose;

(b) Any legal contentions are made in good faith based on the [claimant's] reasonable understanding of existing law;

(c) Any factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and

(d) Any denials of factual contentions have evidentiary support or, if specifically so identified, are reasonably based on belief or a lack of information.

37 C.F.R. § 232.2. This claim does not appear to meet those minimal standards.

The Board orders Bales, Claimant, and Sinclair, Inc. to file a response to this order, jointly or separately, by **December 3, 2026**. The response(s) should be filed on eCCB and may not exceed 10,000 characters in length, not including any relevant documents filed as attachments in support of the response(s). **37 C.F.R. § 220.5(a)(2)(xii)**. The response(s) shall explain why filing this claim in violation of the thirty-claim limit and asserting that Claimant is the author of the allegedly infringed television news segment does not constitute bad-faith conduct as defined in the

Board's regulations. "Bad-faith conduct occurs when a party pursues a claim, counterclaim, or defense for a harassing or other improper purpose, or without a reasonable basis in law or fact. Such conduct includes any actions taken in support of a claim, counterclaim, or defense and may occur at any point during a proceeding before the Board, including before a proceeding becomes an active proceeding." **37 C.F.R. § 220.1(c)**.

To submit the response(s), log into your eCCB account and take the following steps:

1. From your dashboard, you will see this claim under "Ongoing copyright proceedings."
2. Click the "File in existing case" button and select this proceeding from the drop-down menu of active proceedings.
3. Select "Response to Order to Show Cause" from the dropdown menu.
4. You may type your response in the text box.
5. You may also upload, as an attachment, any additional documentation you would like the Board to consider with your response.

The Board will hold a conference by Zoom concerning the issues raised in this order on **December 7, 2026, at 11:30 AM ET**. *See* 37 C.F.R. § 232.3(c). Bales, Claimant, and Sinclair, Inc. are directed to attend to explain why the conduct described in this order does not constitute bad-faith conduct. A Zoom link will be sent before that date.

If there are questions, please contact **asktheboard@ccb.gov**. Include the docket number in the subject line. The Board is unable to provide legal advice. We can provide only legal information and assistance concerning Board procedures and requirements.

Copyright Claims Board