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SCOTT DOUGLAS ORA (Trustee of the Leo Robin Trust), Claimant, vs. WARNER CHAPPELL MUSIC, INC., Respondent.	CCB No. 22-CCB-0072 RESPONDENT WARNER CHAPPELL MUSIC, INC.'S RESPONSE TO CLAIMANT'S REQUEST TO WITHDRAW CLAIM

RESPONSE

More than seven months after filing this action, and after forcing Warner Chappell Music, Inc. ("Warner Chappell") to plead to his claims, participate in discovery, and respond to his request for additional discovery, Claimant now essentially says "never mind" and asks to withdraw his claims without explanation. Moreover, his turnabout is not due to anything new disclosed in discovery. Instead, well before Claimant filed this action, Warner Chappell provided documentation confirming that the two Compositions are works for hire owned by Warner Chappell and for which Fox Studios had the right to use in *The Aftermath* without paying a license fee. In short, Claimant has throughout lacked a reasonable basis in law or fact for the claims he asserted. Allowing Claimant to dismiss his claims without prejudice at this late stage would not be fair, and Warner Chappell does not agree to it.

Accordingly, Warner Chappell respectfully submits that Claimant's claims are properly dismissed with prejudice, with the CCB retaining jurisdiction should Warner Chappell elect to seek an award of attorney's fees.

Dated: June 26, 2023

Peter Anderson, Esq.
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Warner Chappell Music, Inc.

Proof of Delivery

I hereby certify that on Monday, June 26, 2023, I provided a true and correct copy of the RESPONDENT WARNER CHAPPELL MUSIC, INC.'S RESPONSE TO CLAIMANT'S REQUEST TO WITHDRAW CLAIM to the following:

Scott Douglas Ora, individually, and in his derivative capacity as trustee of the Leo Robin Trust, on behalf of the Leo Robin Trust, represented by Scott D Ora, served via ESERVICE at sdo007@aol.com

Signed: /s/ Farrah Vazquez