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February 12, 2024

Copyright Claims Board
101 Independence Ave. S.E.
Washington D.C. 20559-6000

RE: 22-CCB-0046 Opposition to "Confidentiality" and Opposition to Use of Protective Order

Attention Copyright Claims Board:

I write this letter on behalf of Claimant Mary Oakes ("Claimant" or "Ms. Oakes") and in opposition to Respondent Angel Jameson and Heart of Gold Pageant Systems Inc's ("Respondents") "Mary Oakes Confidentiality Agreement", filed as Case Doc #81.

Essentially, the Respondents ask the Board to limit the Claimant's access to direct testimony that Respondent has filed as evidence in this case. Respondent further limited multiple documents under the Board's standard protective order, restricting documents from the docket that are neither privileged nor confidential. Respondent is attempting to limit the Claimant's access to information regarding Respondent's defense of this matter. This is not in the interest of justice, nor is it allowable within the rules of the Copyright Claims Board.

Moreover, as a party to this action, Ms. Oakes has already been provided access to the documents and is entitled to review them. This letter should not be considered Claimant's response to Defendant's documents or to the CCB's February 1, 2024 Order allowing 30 days for Claimant to address any evidence submitted by Respondent. This letter is meant only to address Respondent's filing "Mary Oakes Confidentiality Agreement" which attempts to limit Claimant's access to documentation as well as Respondent's "Restricted" designations in their submitted documents.

In conclusion, Claimant requests that the CCB disregard Respondents' Case Doc #81 filing, which attempts to prejudice Claimant by limiting her access to direct testimony provided as evidence against her. Further, Claimant request the CCB review Respondent's "restricted" documents in order to determine whether they fall in line with the CCB protective order parameters.

Sincerely,

/s/Taryn R. Murray
Taryn R. Murray, Esq.
Attorney for Claimant

Proof of Delivery

I hereby certify that on Monday, February 12, 2024, I provided a true and correct copy of the Response to Doc. No. 81 to the following:

Heart of Gold Pageant System Inc., represented by Legalcorp Solutions, LLC, served via MANUALEEMAIL

Angel Jameson, represented by Angel M Jameson, served via ESERVICE at jamesonservices@gmail.com

Signed: /s/ Taryn R. Murray