Electronically Filed
Docket: 23-CCB-0024
Filing Date: 03/28/2024 05:34:06 PM EDT

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
CHARLES D. JARRELL (BAR NO. 172108)
865 South Figueroa Street, Suite 2800
Los Angeles, California 90017-2543
Phone: (213) 622-5555
Fax: (213) 620-8816
E-Mail: cjarrell@allenmatkins.com

Attorneys for Respondent
LAW ROCKS, INC.

COPYRIGHT CLAIMS BOARD

MICHELLE SHOCKED, Claimant, vs. LAW ROCKS, INC., Respondent.	Case No. 23-CCB-0024 STATEMENT OF OMI CRAWFORD

I, Omi Crawford, state as follows:

1. I am the Director of Law Rocks. Inc. ("Law Rocks" or "Claimant"). I have personal knowledge of the facts set forth in this Declaration, except those matters identified as being made on information and belief, if any, and, if called as a witness, could and would testify competently to such facts under oath. I make this declaration in connection with the April 10, 2024 Merits Conference in the above-referenced matter.

2. Law Rocks is a 501(c)(3) nonprofit organization, founded in 2009 in London. Our website is www.lawrocks.org. The mission of Law Rocks is "to promote music education for underprivileged youth and raise funds for local nonprofit organizations by combining the power of music and the generosity of the global legal community." Law Rocks has raised more than $7 million in its existence, and charities around the world have benefited from Law Rocks events, and the funds that are raised at these events.

3. Law Rocks allows bands featuring legal professionals and attorneys to participate in the shows, and each band selects a local charity to support. All shows are videotaped, and participants are advised in advance of the videotaping. Until Ms. Shocked lodged her complaints following the October 20 New York event, we had never received any objection to, or complaint regarding, the videotaping of Law Rocks shows. To the contrary, we consistently hear from participants how grateful they are to have a high quality video recording of their performance.

4. On August 22, 2022, Law Rocks received an application to participate in the New York show from Michelle Shocked via its electronic application form that is accessible through the Law Rocks site at www.lawrocks.org. The Application indicated it was completed by Ms. Shocked, and listed her name and email address.

5. The Law Rocks band application form includes a section, "Important additional details about playing the event", and advises applying bands that "The concert will be professionally filmed…". Ms. Shocked selected "I accept" for this section.

6. Also on August 22, 2022, I received an email from "mshocked@michelleshocked.com" which indicated that "Michelle" had completed the application form for her band.

7. Following submission of her Application, I emailed Ms. Shocked on August 23, 2022, and provided her (and her colleague Drew Kastner) with the Law Rocks Band Welcome Kit. In my email, I emphasized the importance of the information in the Welcome Kit. The Band Welcome Kit also re-confirms the fact that the performance would be filmed.

8. Following my Welcome email, Law Rocks received a further submittal from Ms. Shocked on August 23, 2022, in which she listed additional information, including her website, twitter, facebook and Instagram sites, as well as uploaded her photo. Ms. Shocked then sent me another email stating "Just to confirm I've completed the band profile. Thanks!"

9. I never received any complaints from Ms. Shocked regarding the filming of the event, until after the event.

10. Ms. Shocked's band raised less than $1,000 in tickets and sponsorships in connection with the October 20 New York event, which is well below the expected $5,000

fundraising commitment confirmed in the application materials. The other bands that performed on October 20 fortunately raised enough money to ensure that the event costs were covered. The Claimant's band raised $1,049 in donation funds, which were sent to Ms. Shocked.

11. I understand that Ms. Shocked claims that an additional donation was made on her band's behalf on the evening of the event. She is mistaken. Although Law Rocks did bend its normal set list restrictions so that Ms. Shocked's band could play an additional song, Law Rocks did not receive any consideration or funds based on this courtesy.

12. On October 21, 2022, Law Rocks sent a thank you email to all of the participating bands, which provided links to photos from the event, and noted that "Video will be edited and sent within two weeks." Ms. Shocked responded on October 22, 2022, lodging a number of questions regarding the event, including: "Was any mention made in the participation for Law Rocks process [sic] that video recordings were being made?"

13. I responded to Ms. Shocked that same day, and noted that "the application does include the information that the charity event will be professionally filmed," but advised Ms. Shocked that: "From your email I'm assuming you would request we do not include video of your set on our channel or downloads or anywhere else. We would of course respect that for you or anyone else who asked." Ms. Shocked nonetheless continued to email me, claiming that the video was "shot without authorization."

14. I understand that, subsequent to these exchanges, our counsel Charles Jarrell had a number of conversations with Ms. Shocked's counsel, Drew Kastner. These discussions yielded an agreement by Law Rocks to permanently discard and destroy all video recordings of Ms. Shocked's October 20, 2022 performance.

15. Our staff deleted the file and I personally communicated with our videographer, and instructed them to ensure that any and all video recordings of Ms. Shocked's performance were discarded and destroyed. I received confirmation in writing that this occurred.

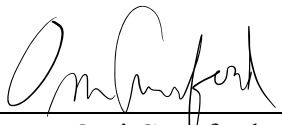
16. I have never seen a video recording of Ms. Shocked's October 20, 2022 performance. Neither I nor Law Rocks have distributed, sold, posted, disseminated or published

any such video. I believe that all video recordings of Ms. Shocked from the event have been permanently discarded and destroyed.

17. Law Rocks incurred costs of more than $35,000.00 in connection with the October 20, 2022 New York Law Rocks event.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Executed on March 28, 2024, at Los Angeles, California.



Omi Crawford

Proof of Delivery

I hereby certify that on Thursday, March 28, 2024, I provided a true and correct copy of the Statement of Omi Crawford to the following:

Michelle Shocked, represented by Michelle Shocked, served via ESERVICE at account@michelleshocked.com

Signed: /s/ Charles D. Jarrell