

# EXHIBIT A

1 Robert S. Besser (SBN 46541)  
2 LAW OFFICES OF ROBERT S. BESSER  
3 1221 Second Street, Suite 300  
4 Santa Monica, California 90401  
5 TEL: (310) 394-6611  
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7 Attorneys for Plaintiffs  
8 CAN'T STOP PRODUCTIONS AND  
9 SCORPIO MUSIC (BLACK SCORPIO) S.A.

10 UNITED STATES DISTRICT COURT  
11 SOUTHERN DISTRICT OF CALIFORNIA

12 SCORPIO MUSIC (BLACK SCORPIO)  
13 S. A. and CAN'T STOP PRODUCTIONS,  
14 INC.

Case No. '11CV1557 BTM RBB

15 Plaintiff,

COMPLAINT FOR DECLARATORY  
RELIEF

16 vs.

17 VICTOR WILLIS

18 Defendant.  
19 \_\_\_\_\_/

20 By this action, Plaintiffs Scorpio Music, S.A. and Can't Stop Productions, Inc., seek  
21 a declaration of this Court that Defendant Victor Willis' attempt to exercise rights of  
22 recapture pursuant to Section 203(a) of the United States Copyright Act (17 U. S. C. §  
23 203(a)) is void and of no force or effect and in support thereof allege as follows:

24 The Parties

25 1. Plaintiff Scorpio Music (Black Scorpio), S.A. ("Scorpio Music") is a corporation  
26 duly organized and existing under the laws of the nation of France and having as its  
27 principal place of business at 92, Avenue Kleber, 75116 Paris, France. At all relevant

1 times Scorpio Music was, and continues to be a company engaged in the business of  
2 publishing and otherwise commercially exploiting musical compositions.

3 2. Plaintiff Can't Stop Productions, Inc. ("Can't Stop") is a corporation duly  
4 organized and existing under the laws of the State of New York and having its principal  
5 place of business at 1995 Broadway, 16<sup>th</sup> Floor, New York, New York 10023. At all  
6 relevant times Can't Stop, through its division, Can't Stop Music, was and continues to  
7 be a company engaged in the business of publishing and otherwise commercially  
8 exploiting musical compositions.

9 3. Defendant Victor Willis, upon information and belief, is a citizen of the  
10 State of California residing at 9115 Judicial Drive, No. 4521, San Diego, California  
11 92122

12 4. Plaintiff Can't Stop, at all relevant times was and continues to be the  
13 exclusive sub-publisher and administrator in the United States of musical compositions  
14 published and owned by Scorpio Music. In that capacity Can't Stop represents  
15 Scorpio Music in the commercial exploitation of Scorpio Music's musical compositions,  
16 including enforcing Scorpio Music's rights in those compositions.

17  
18 Jurisdiction and Venue

19  
20 5. The jurisdiction of this Court is based upon 28 U.S.C. Sections 1331 and  
21 1338(a) in that the controversy arises under an Act of Congress relating to copyright;  
22 to wit, the copyright laws of the United States (17 U.S.C. Section 101 *et seq.*). This  
23 action, to the extent that it seeks declaratory relief, is also brought under 28 U.S.C.  
24 Section 2201 and Rule 57 of the Federal Rules of Civil Procedure.

1 6. Venue is proper under 28 U.S.C. Section 1391(b) in that defendant Willis  
2 resides in the City of San Diego, State of California.

3 The Facts

4 7. Between 1977 and 1979 defendant Willis entered into a series of  
5 agreements with Can't Stop which were denoted as "Adaptation Agreements" (the  
6 "Agreements")

7 8. Pursuant to the terms of the Agreements Can't Stop, acting on behalf of  
8 Scorpio Music, hired defendant to translate the lyrics of and/or create new lyrics for  
9 certain musical compositions which were owned and published in France by Scorpio  
10 Music.

11 9. Can't Stop instructed defendant Willis concerning what English lyrics it  
12 desired him to provide, and supervised defendant Willis' work in this regard by, among  
13 other things, providing him with, and paying for, the facilities in which he rendered his  
14 services.

15 10. Defendant Willis, in accordance with the terms of the Agreements, wrote  
16 and/or translated some, but not all of the English lyrics of these compositions.

17 11. Can't Stop thereupon assigned to Scorpio Music its rights in the lyrics  
18 provided by defendant Willis, and filed, on behalf of Scorpio Music, copyright  
19 registrations in the United States Library of Congress, Copyright Office, for the songs  
20 containing these lyrics.

21 12. The registrations credited defendant Willis as being one of several writers  
22 on each of the compositions.

23 13. Defendant Willis has received for more than thirty years, as compensation  
24 for his services and in accordance with the terms of the Agreements, a percentage of  
25 Can't Stop's receipts from the commercial exploitation of these compositions, which  
26 percentages range from 12% to 20% depending upon the composition.

1                   Defendant Willis Wrongly Seeks to Terminate Copyright Ownership

2  
3           14. In January 2011 defendant Willis served upon Can't Stop a "Notice of  
4 Termination of Post 1977 Grants of Copyright on Certain Works of Victor Willis" (the  
5 "Notice"). A true and exact copy of the Notice is attached hereto as Exhibit "A" and  
6 incorporated herein by this reference.

7           15. The Notice purports to terminate the rights of, among others, Scorpio Music  
8 and its agent, Can't Stop, in certain of the compositions (the "Compositions") which are  
9 enumerated in Schedule A of the Notice.

10           16. The Notice incorrectly states that Defendant Willis is "the author of the  
11 Works and the sole grantor of the rights under the Agreements," and wrongfully  
12 suggests that the entire copyright in all the Compositions should be reassigned to him  
13 at the expiration of the thirty- five year period set forth in the Copyright Law for songs in  
14 which the grant of a transfer of copyright was allegedly executed by defendant Willis on  
15 or after January 1, 1978.

16  
17                   Defendant Willis Refuses to Withdraw Notice Despite Can't Stop's  
18                   Response Setting Forth the Errors in His Position

19  
20           17. Can't Stop responded to the Notice by writing to Defendant Willis' attorney  
21 explaining that Defendant Willis had no legitimate right to seek the termination of Scorpio  
22 Music's copyright ownership, and demanding that the Notice be withdrawn.

23           18. Defendant Willis, through his attorney, has refused to withdraw the Notice.

24           19. That refusal is contrary to the facts and the governing law.

**Defendant Willis Cannot Terminate Copyright Assignment in Joint Work**

20. The Compositions, in their English language versions, are joint works written by more than one person.

21. In accordance with the Copyright Law joint works are considered as a "unitary whole" with each contributor's part "merged into inseparable or interdependent parts of a unitary whole" 17 U.S.C. Section 101.

22. Each of writers of the Compositions granted their copyright interests, if any, either to Can't Stop, as the agent of Scorpio Music, or to Scorpio Music itself.

23. While defendant Willis signed the Agreements, the other writers of the Compositions signed songwriter agreements with Scorpio Music.

24. 17 U.S.C. Section 203(a)(1) provides that "[i]n the case of a grant executed by two or more authors of a joint work, termination of the grant may be effected by a majority of the authors who executed it."

25. Defendant Willis, simply because he signed documents different from the ones signed by the other authors of the same joint works, is neither the sole grantor nor only author of any of the Compositions and hence, he is not a "majority of authors." As a result, defendant Willis could not terminate the copyright assignment for any of the Compositions without at least one other writer joining with him for such Composition. Willis' attempt to do so is, therefore, void as to all of the Compositions.

**Alternatively, Can't Stop Employed Defendant Willis as a Writer for Hire and He Therefore Has No Rights in Copyrights**

26. In the alternative, pursuant to the Agreements, Can't Stop employed defendant Willis and, hence, he is a writer for hire with no right in the copyrights to the Compositions for which he provided some English lyrics.

1 27. In addition to the Agreements establishing defendant Willis' "writer for hire"  
2 status, the circumstances pursuant to which defendant Willis rendered his services confirm  
3 that he functioned as an employee of Can't Stop.

4 28. Can't Stop, as part of its regular business of representing Scorpio Music in the  
5 United States, supervised and controlled the manner and means by which defendant Willis  
6 worked, including its location and duration, as well as the substance and meaning of the  
7 lyrics to be provided.

8 29. The Compositions, with some of the English lyrics provided by defendant  
9 Willis, appeared as parts of record albums (i.e., collective works), further qualifying  
10 defendant Willis' contribution to the Compositions as being works made for hire pursuant  
11 to the provisions of 17 U.S.C. Section 101(2).

12 30. Section 203(a) of the U. S. Copyright Act, under which Willis purports to  
13 exercise his rights, specifically excludes works made for hire.

14  
15 Defendant Willis' Claim is Time-Barred  
16

17 31. Defendant Willis entered into the Agreements more than thirty years ago.

18 32. During this period Can't Stop, pursuant to the terms of the Agreements, has  
19 paid him hundreds of thousands of dollars.

20 33. Equitable concepts such as laches and estoppel, as well as the relevant statute  
21 of limitations, preclude any attempt by defendant Willis to contest the validity of his status  
22 as a writer for hire.  
23  
24  
25  
26

1                    Even If Defendant Willis Has Recapture Rights He Cannot Obtain a Greater  
2                    Proportion of the Copyright in the Compositions Than His Percentage Set Forth in the  
3                    Agreements

4                    34. Upon information and belief, defendant Willis claims the right to recapture at  
5                    least half (i.e., fifty percent) of the copyrights in each of the Compositions.

6                    35. Upon information and belief, defendant Willis ignores the existence of other  
7                    people listed as writers of the Compositions to claim that he, alone, wrote all of their lyrics.

8                    36. Although, as noted above, defendant Willis has no right to any portion of the  
9                    copyrights, and the statute of limitations and equitable doctrines preclude him from  
10                    disputing authorship attribution, in the event it is found otherwise, defendant Willis'  
11                    maximum reversionary share of the copyright should be governed by, and be equal to, the  
12                    percentage of royalties set forth in the Agreements which defendant Willis received as his  
13                    compensation for services rendered.

14                    37. The percentage referred to in paragraph 36, above, ranges from 12 to 20%.

15                    Defendant Willis Cannot Terminate Existing Licenses and Derivative Works

16  
17                    38. Even if Willis is found to have the right to terminate his alleged copyright  
18                    transfer relating to the Compositions, he is precluded from terminating any licenses issued,  
19                    or derivative works authorized, by Plaintiffs, which existed prior to the termination of the  
20                    copyright assignment.

21  
22                    Claim

23                    39. Plaintiff Can't Stop repeats and realleges each and every allegation set forth  
24                    in paragraphs 1 through 39 hereof with the same force and effect as if more fully set forth  
25                    herein.





1           46. Plaintiffs have no adequate remedy at law.

2  
3                   WHEREFORE, Plaintiffs Can't Stop Productions, Inc. and Scorpio Music  
4 (Black Scorpio) S.A. pray that this Court:

5           a.       Render a declaratory judgment providing that defendant Victor Willis has no  
6 right, title or interest in the copyrights to the Compositions;

7           b.       Enter an order requiring defendant Willis to withdraw the Notice of  
8 Termination and submit to the United States Copyright Office whatever written document(s)  
9 it requires to effectuate such withdrawal, with copies to Plaintiffs;

10           c.       Enter an order enjoining defendant Victor Willis, or any of his agents,  
11 licensees, representatives or assignees, from making any claims to the copyrights in the  
12 Compositions or in any other manner encumbering or restricting Can't Stop Productions,  
13 Inc.'s and Scorpio Music (Black Scorpio) S.A.'s rights in the Compositions.

14           d.       In the alternative, and in the event defendant Willis is found to have a right  
15 to terminate the rights of Can't Stop Productions, Inc. and Scorpio Music (Black Scorpio)  
16 S.A. in the Compositions, that such reversion of rights to defendant Willis (i) be limited to  
17 the same percentage ownership as he receives as compensation relating to the  
18 Compositions and as set forth in the Agreements; and (ii) that defendant Willis be enjoined  
19 from terminating any licenses issued, or derivative works authorized, by Plaintiffs, which  
20 existed prior to the termination of the copyright assignment.

21           e.       Award plaintiff Can't Stop Productions, Inc. and Scorpio Music (Black  
22 Scorpio) S.A. their costs and disbursements incurred in this suit, together with a  
23 reasonable allowance for counsel fees as provided by Section 505 of the Copyright Act,  
24 17 U.S.C. Section 505.

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f. Grant such other and further relief as the Court may deem just and proper.

Dated: July 14, 2011

LAW OFFICES OF ROBERT S. BESSER

By   
ROBERT S. BESSER

Attorneys for Plaintiffs, CAN'T STOP  
PRODUCTIONS AND SCORPIO MUSIC  
(BLACK SCORPIO) S.A.

*Exhibit A*  
10

JS 44 (Rev. 12/07)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

<p><b>I. (a) PLAINTIFFS</b>  <b>SCORPIO MUSIC (BLACK SCORPIO) S.A. and CAN'T STOP PRODUCTIONS, INC.</b></p> <p><b>(b) County of Residence of First Listed Plaintiff</b> <u>Paris, France</u>                  (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p><b>(c) Attorney's (Firm Name, Address, and Telephone Number)</b>  <b>LAZ OFFICES OF ROBERT S. BESSER (310) 394-6611</b>  <b>1221 Second Street, Third Floor, Santa Monica, CA 90401</b></p>	<p><b>DEFENDANTS</b>  <b>VICTOR WILLIS</b></p> <p>County of Residence of First Listed Defendant <u>San Diego</u>                  (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.</p> <p>Attorneys (If Known)  <u>'11CV1557 BTM RBB</u></p>
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<p><b>II. BASIS OF JURISDICTION</b> (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;"></td> <td style="width:10%; text-align: center;"><b>PTF</b></td> <td style="width:10%; text-align: center;"><b>DEF</b></td> <td style="width:33%;"></td> <td style="width:10%; text-align: center;"><b>PTF</b></td> <td style="width:10%; text-align: center;"><b>DEF</b></td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p><b>PERSONAL INJURY</b></p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<p><b>PERSONAL INJURY</b></p> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p><b>PERSONAL PROPERTY</b></p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <input type="checkbox"/> 510 Motions to Vacate Sentence <p><b>Habeas Corpus:</b></p> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<p><b>OTHER STATUTES</b></p> <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
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**V. ORIGIN** (Place an "X" in One Box Only)

1 Original Proceeding     2 Removed from State Court     3 Remanded from Appellate Court     4 Reinstated or Reopened     5 Transferred from another district (specify)     6 Multidistrict Litigation     7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION** Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
17 U.S.C. Sections 101 et seq.

Brief description of cause:  
Declaratory relief re attempt by Defendant to recapture copyrights

**VII. REQUESTED IN COMPLAINT:**  CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23    **DEMAND \$** \_\_\_\_\_    CHECK YES only if demanded in complaint: **JURY DEMAND:**  Yes  No

**VIII. RELATED CASE(S) IF ANY** (See instructions):    JUDGE \_\_\_\_\_    DOCKET NUMBER \_\_\_\_\_

DATE: 07/14/2011    SIGNATURE OF ATTORNEY OF RECORD: [Signature]

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFF \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

*Exhibit A*  
*11*

# EXHIBIT "A"

**Harold Seider**  
8212 De Longprs Avenue  
Los Angeles, California 90046  
323-650-0130

**VIA FIRST CLASS REGULAR MAIL**

Date: January 21 2011

c/o Can't Stop Productions, Inc.,  
Jay L. Wallberg  
Markum and Kleigman  
655 Third Avenue 16<sup>th</sup> Floor  
New York, NY 10017

and  
c/o Can't Stop Music, a division of Can't Stop Productions, Inc  
Stephen L. Kopitko, Esq.,  
1995 Broadway 16<sup>th</sup> Floor  
New York, NY 10023

and  
Scorpio Music and Black Scorpio SARL  
92 Avenue Kleber  
75116 Paris France

and  
Francis Dreyfus Music and Societe Dreyfus Music Francis  
26 Avenue Kleber  
75116 Paris France

and  
Universal Music Publishing MGB France and Le Rideau Rouge Editions SA  
16 Rue Des Fosses Saint Jacques  
75005 Paris France

and  
You You Music Editions  
29 Avenue Mac Mahon  
75809 Paris Cedex 17, France

Re: Notice of Termination of Post 1977 Grants of  
Copyright on Certain Works of Victor Willis

Sirs:

**PLEASE TAKE NOTICE** that, pursuant to Section 203(a) of the U.S. Copyright Act of 1976, 17 U.S.C. §203(a), Victor Willis hereby terminates the grants of rights for certain musical works of Victor Willis (the "Work(s)"), including, but not limited to copyright, all publication rights and all rights under

Exhibit A  
13

copyright, made pursuant to the applicable agreements ("Agreement(s)") referenced beside each Work set forth on the Schedule "A" attached hereto and incorporated herein by this reference ("Schedule") The attached Schedule identifies for each Work, the applicable (i) Effective Date of Termination, (ii) Agreement and Execution Date, (iii) Original Grantee(s) and/or the Purported Successor(s) in Interest, (iv) Registration Numbers and Dates, and (v) Date(s) of Publication of the Works.

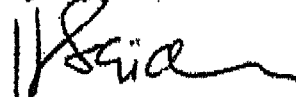
Based upon reasonable investigation of the records of the NYS Department of State Division of Corporations, BMI, SACEM and the United States Copyright Office, it appears that each of you, at the respective addresses noted above, are or may be the current owners of or claimants to the rights in and to one or more of the Works under the Agreements, as specifically set forth on the attached Schedule. Accordingly, service of this Notice of Termination is being made upon each of you at the addresses noted above.

This Notice is served upon you and effected by Victor Willis, the author of the Works and the sole grantor of the rights under the Agreements, by and through his attorney-in-fact and authorized agent, Harold Seider, c/o of the address first listed above.

The undersigned represents that he is the duly authorized agent of Victor Willis

Thank you for your cooperation.

Very truly yours,



HAROLD SEIDER

As Attorney-in-fact and Duly Authorized  
Agent of Victor Willis

cc: Victor Willis w/encls.  
Brian D. Caplan, Esq. w/encls

**SCHEDULE A**  
to  
**NOTICE of TERMINATION**  
**OF A GRANT OF TRANSFER OF COPYRIGHT**  
(pursuant to Section 203 of the Copyright Act, 17 U.S.C. 203)

Dated the \_\_\_\_ day of January, 2011

- |           |                                  |  |
|-----------|----------------------------------|--|
| <b>1.</b> | <b>Song Title</b>                | <b>Y. M. C. A.</b>   |
|           | <b>Author(s) Executing Grant</b> | <b>Victor Willis</b>   |
|           | <b>Registration No. and Date</b> | <b>PA-25-983/<br/>1-22-1979</b>  |
|           | <b>Claimant(s)</b>               | <b>(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.<br/>and<br/>(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright</b> |
|           | <b>Publication Date</b>          | <b>12 September 1978</b>   |
|           | <b>Agreement and Date</b>        | <b>The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8<sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".</b>           |
|           | <b>Effective Date</b>            | <b>Termination is to become effective at midnight on the 13<sup>th</sup> day of September 2013</b>   |
| <b>2.</b> | <b>Song Title</b>                | <b>I'm A Cruiser</b>   |
|           | <b>Author(s) Executing Grant</b> | <b>Victor Willis</b>   |



<b>Registration No. and Date</b>	<b>PA-19-712/ 12/11/1978</b>
<b>Claimant(s)</b>	<b>(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc., and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright</b>
<b>Publication Date</b>	<b>12 September 1978</b>
<b>Agreement and Date</b>	<b>The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8<sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".</b>
<b>Effective Date</b>	<b>Termination is to become effective at midnight on the 13<sup>th</sup> day of September 2013</b>
<b>3. Song Title</b>	<b>Hot Cop</b>
<b>Author(s) Executing Grant</b>	<b>Victor Willis</b>
<b>Registration No. and Date</b>	<b>PA-19-713/ 12-11-1978</b>
<b>Claimant(s)</b>	<b>(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc., and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright</b>
<b>Publication Date</b>	<b>12 September 1978</b>

<b>Agreement and Date</b>	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8 <sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
<b>Effective date</b>	Termination is to become effective at midnight on the 13 <sup>th</sup> day of September 2013
<b>4. Song Title</b>	<b>Ups and Downs</b>
<b>Author(s) Executing Grant</b>	Victor Willis
<b>Registration No. and Date</b>	PA-19-715/ 12-11-1978
<b>Claimant(s)</b>	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc. and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
<b>Publication Date</b>	12 September 1978
<b>Agreement and Date</b>	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8 <sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
<b>Effective Date</b>	Termination is to become effective at midnight on the 13 <sup>th</sup> day of September 2013
<b>5. Song Title</b>	<b>My Roomate</b>

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-19-714/  
12-11-1978

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

**Publication Date** 12 September 1978

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8<sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 13<sup>th</sup> day of September 2013

6. **Song Title** **The Women**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-19-711/  
12-11-1978

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and

(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

**Publication Date** 12 September 1978

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8<sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 13<sup>th</sup> day of September 2013

7. **Song Title** **I Love America**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-38-593/  
6-20-1979 (Supplemental filing)  
to PA-29-910/  
2-15-1979 (initial filing)

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on Supplemental copyright registration (PA-38-593), and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright  
and  
(3) Lerideau Rouge, as copyright claimant on initial copyright registration (PA-29-910)  
and  
(4) Francis Dreyfus Music, as copyright claimant on initial copyright registration (PA-29-910)

and

(5) You You Music Editions, as possible successor in interest of Lerideau Rouge and Francis Dreyfus Music, and described by SACEM as a co-publisher

**Publication Date** 14 June 1978

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 13<sup>th</sup> day of February, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013

**8. Song Title** **Got A Feeling**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA29-908/  
2-15-1979 (Initial filing)  
PA-38-592/  
6-20- 1979 (Supplemental filing)

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on Supplemental copyright registration, (38-592) and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc,  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright  
and  
(3) Lerideau Rouge, as copyright claimant on initial copyright registration (PA-29-908)  
and  
(4) Francis Dreyfus Music, as copyright claimant on

initial copyright registration (PA-29-908)  
and  
(5) You You Music Editions, as possible successor  
in interest of Lerideau Rouge and Francis  
Dreyfus Music, and described by SACEM as a co-  
publisher

**Publication Date** 14 June 1978

**Agreement and Date** The grant to which this notification applies is  
described on the form used as an "Adaptation  
Agreement" dated the 13<sup>th</sup> day of February, 1978  
by and between Victor Willis, as grantor, but  
described on the form used as "Adapter" and Can't  
Stop Music, a division of Can't Stop Productions,  
Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight  
on the 15<sup>th</sup> day of June 2013

**9. Song Title** **Another Lonely Man**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA29-909/  
2-15-1979 (Initial filing)  
PA-38-594/  
6-20-1979 (Supplemental filing)

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright  
claimant on Supplemental copyright registration,  
(38-594) and as purported successor in interest to  
Can't Stop Music, a division of Can't Stop  
Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't  
Stop Productions, Inc., as original publisher and  
original grantee of the copyright  
and  
(3) Lerideau Rouge, as copyright claimant on  
initial copyright registration (PA-29-909)  
and

(4) Francis Dreyfus Music, as copyright claimant on initial copyright registration (PA-29-909)  
and  
(5) You You Music Editions, as possible successor in interest of Lerideau Rouge and Francis Dreyfus Music, and described by SACEM as a co-publisher

**Publication Date** 14 June 1978

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 13<sup>th</sup> day of February, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013

**10. Song Title** **Where Is My Woman**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** Pau 25-296/  
6-06-1978

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright of English lyrics  
and  
(3) Lerideau Rouge as original copyright claimant  
and  
(4) Francis Dreyfus Music as original copyright claimant

<b>Publication Date</b>	15 May 1978 or 14 June 1978 (included on Casablanca album NBLP 7101 released as indicated on copyright registration no. SR000001612 dated 1978-06-02 for this album)
<b>Agreement and Date</b>	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8 <sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
<b>Effective Date</b>	Termination is to become effective at midnight on the 16 <sup>th</sup> day of May 2013 or 15 <sup>th</sup> day of June 2013
<b>11. Song Title</b>	<b>In The Navy</b>
<b>Author(s) Executing Grant</b>	Victor Willis
<b>Registration No. and Date</b>	PA-27-111/ 3-13-1979
<b>Claimant(s)</b>	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.,  and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
<b>Publication Date</b>	05 March 1979
<b>Agreement and Date</b>	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 12 <sup>th</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't



	<b>Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".</b>
<b>Effective Date</b>	<b>Termination is to become effective at midnight on the 6<sup>th</sup> day of March 2014</b>
<b>12. Song Title</b>	<b>Go West</b>
<b>Author(s) Executing Grant</b>	<b>Victor Willis</b>
<b>Registration No. and Date</b>	<b>PA-29-525/ 4-9-1979</b>
<b>Claimant(s)</b>	<b>(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc., and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright</b>
<b>Publication Date</b>	<b>23 March 1979</b>
<b>Agreement and Date</b>	<b>The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 12<sup>th</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".</b>
<b>Effective Date</b>	<b>Termination is to become effective at midnight on the 24<sup>th</sup> day of March 2014</b>
<b>13. Song Title</b>	<b>Get Away Holiday</b>
<b>Author(s) Executing Grant</b>	<b>Victor Willis</b>
<b>Registration No. and Date</b>	<b>PA29-528/ 4-9-1979</b>

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<b>Claimant(s)</b>	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc, and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
<b>Publication Date</b>	23 March 1979
<b>Agreement and Date</b>	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 12 <sup>th</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
<b>Effective Date</b>	Termination is to become effective at midnight on the 24 <sup>th</sup> day of March 2014
<b>14. Song Title</b>	<b>I Wanna Shake Your Head</b>
<b>Author(s) Executing Grant</b>	Victor Willis
<b>Registration No. and Date</b>	PA-29-527/ 4-9-1979
<b>Claimant(s)</b>	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc, and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
<b>Publication Date</b>	23 March 1979
<b>Agreement and Date</b>	The grant to which this notification applies is described on the form used as an "Adaptation

	<p>Agreement" dated the 12<sup>th</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".</p>
Effective Date	Termination is to become effective at midnight on the 24 <sup>th</sup> day of March 2014
<b>15. Song Title</b>	<b>Citizens of the World</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-29-526/ 4-9-1979
Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc,  and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
Publication Date	23 March 1979
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 12 <sup>th</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
Effective Date	Termination is to become effective at midnight on the 24 <sup>th</sup> day of March 2014
<b>16. Song Title</b>	<b>Manhattan Woman</b>

<b>Author(s) Executing Grant</b>	<b>Victor Willis</b>
<b>Registration No. and Date</b>	<b>PA-27-112/ 3-13-1979</b>
<b>Claimant(s)</b>	<b>(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc,  and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright</b>
<b>Publication Date</b>	<b>05 March 1979</b>
<b>Agreement and Date</b>	<b>The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 12<sup>th</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".</b>
<b>Effective Date</b>	<b>Termination is to become effective at midnight on the 6<sup>th</sup> day of March 2014</b>
<b>17. Song Title</b>	<b>Where Are The Men</b>
<b>Author(s) Executing Grant</b>	<b>Victor Willis</b>
<b>Registration No. and Date</b>	<b>PA-40-226/ 8-3-1979</b>
<b>Claimant(s)</b>	<b>(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc,  and</b>

(2) **Can't Stop Music**, a division of **Can't Stop Productions, Inc.**, as original publisher and original grantee of Victor Willis of the copyright

**Publication Date** 02 July 1979

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 15<sup>th</sup> day of May 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 3<sup>rd</sup> day of July 2014

**18. Song Title** **It's A Man's World**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-40-225/  
8-3-1979

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) **Can't Stop Music**, a division of **Can't Stop Productions, Inc.**, as original publisher and original grantee of Victor Willis of the copyright

**Publication Date** 02 July 1979

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 15<sup>th</sup> day of May 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date	Termination is to become effective at midnight on the 3 <sup>rd</sup> day of July 2014
19. Song Title	<b>Sery Man</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-40-227/ 8-3-1979
Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc., and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
Publication Date	02 July 1979
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 15 <sup>th</sup> day of May 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
Effective Date	Termination is to become effective at midnight on the 3 <sup>rd</sup> day of July 2014
20. Song Title	<b>Bad Reputation</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-40-224/ 8-3-1979

<b>Claimant(s)</b>	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc. and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright
<b>Publication Date</b>	02 July 1979
<b>Agreement and Date</b>	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 15 <sup>th</sup> day of May 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
<b>Effective Date</b>	Termination is to become effective at midnight on the 3 <sup>rd</sup> day of July 2014
<b>21. Song Title</b>	<b>Lady Night</b>
<b>Author(s) Executing Grant</b>	Victor Willis
<b>Registration No. and Date</b>	PA-48-434/ 10-24-1979
<b>Claimant(s)</b>	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc. and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright and (3) You You Music Editions, described by SACEM as a co-publisher
<b>Publication Date</b>	10 April 1979

<b>Agreement and Date</b>	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 2 <sup>nd</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
<b>Effective Date</b>	Termination is to become effective at midnight on the 11 <sup>th</sup> day of April 2014
<b>22. Song Title</b>	<b>Swiss Kiss</b>
<b>Author(s) Executing Grant</b>	Victor Willis
<b>Registration No. and Date</b>	PA-48-435/ 10-24-1979
<b>Claimant(s)</b>	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc, and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright and (3) You You Music Editions, described by SACEM as a co-publisher.
<b>Publication Date</b>	10 April 1979
<b>Agreement and Date</b>	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 2 <sup>nd</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
<b>Effective Date</b>	Termination is to become effective at midnight on the 11 <sup>th</sup> day of April 2014



- 23. Song Title** **Viva California**
- Author(s) Executing Grant** **Victor Willis**
- Registration No. and Date** **PA-48-436/  
10-24-1979**
- Claimant(s)** **(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc, and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright and  
(3) You You Music Editions, described by SACEM as a co-publisher**
- Publication Date** **10 April 1979**
- Agreement and Date** **The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 2<sup>nd</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher",**
- Effective Date** **Termination is to become effective at midnight on the 11<sup>th</sup> day of April 2014**
- 24. Song Title** **The Gay Paris**
- Author(s) Executing Grant** **Victor Willis**
- Registration No. and Date** **PA-48-437/  
10-24-1979**

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Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Cant Stop Productions, Inc. and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright and (3) You You Music Editions, described by SACEM as a co-publisher
Publication Date	10 April 1979
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 2 <sup>nd</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
Effective Date	Termination is to become effective at midnight on the 11 <sup>th</sup> day of April 2014
25. Song Title	<b>French Pillow Talk</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-48-438/ 10-24-1979
Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc. and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

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and

(3) You You Music Editions, described by SACEM as a co-publisher

**Publication Date** 10 April 1979

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 2<sup>nd</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 11<sup>th</sup> day of April 2014

**26. Song Title** **Magic Night**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-86-058/  
6-19-1980.

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

**Publication Date** 20May 1980

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 14<sup>th</sup> day of August 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 21<sup>st</sup> day of May 2015

**27. Song Title** **Milkshake**

**Author(s) Executing Grant** **Victor Willis**

**Registration No. and Date** **PA-86-060/  
6-19-1980**

**Claimant(s)** **(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc,**  
**and**  
**(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright**

**Publication Date** **20May 1980**

**Agreement and Date** **The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 14<sup>th</sup> day of August 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".**

**Effective Date** **Termination is to become effective at midnight on the 21<sup>st</sup> day of May 2015**

**28. Song Title** **Saint Louis**

**Author(s) Executing Grant** **Victor Willis**

**Registration No. and Date** **PA-12-948/  
9-11-1978**

<b>Claimant(s)</b>	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc. and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright
<b>Publication Date</b>	14 June 1978
<b>Agreement and Date</b>	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" that is undated but reasonably believed to have been entered into subsequent to 1/1/1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
<b>Effective Date</b>	Termination is to become effective at midnight on the 15 <sup>th</sup> day of June 2013
<b>29. Song Title</b>	<b>Broadway</b>
<b>Author(s) Executing Grant</b>	Victor Willis
<b>Registration No. and Date</b>	PA-12-949/ 9-11-1978
<b>Claimant(s)</b>	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc. and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright
<b>Publication Date</b>	14 June 1978
<b>Agreement and Date</b>	The grant to which this notification applies is described on the form used as an "Adaptation

Agreement" that is undated but reasonably believed to have been entered into subsequent to 1/1/1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date

Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013

30. **Song Title**

**Star of Paris**

**Author(s) Executing Grant**

**Victor Willis**

**Registration No. and Date**

**PA-12-950/  
9-11-1978**

**Claimant(s)**

**(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright**

**Publication Date**

**14 June 1978**

**Agreement and Date**

**The grant to which this notification applies is described on the form used as an "Adaptation Agreement" that is undated but reasonably believed to have been entered into subsequent to 1/1/1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".**

**Effective date**

**Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013**

31. **Song Title**

**Josephine Superstar**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-12-952/  
9-11-1978

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Cant Stop Productions, Inc.,  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright

**Publication Date** 14 June 1978

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" that is undated but reasonably believed to have been entered into subsequent to 1/1/1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013

**32. Song Title** **Around the World**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-12-951/  
9-11-1978

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.,  
and

(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright

**Publication Date** 14 June 1978

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" that is undated but reasonably believed to have been entered into subsequent to 1/1/1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013

**33. Song Title** Don't Cry Mommy

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-12-953/  
9-11-1978

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc,  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright

**Publication Date** 14 June 1978

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" that is undated but reasonably believed to have been entered into subsequent to 1/1/1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't



**Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".**

**Effective Date**

**Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013**