

1 MAURICE D. PESSAH (SBN: 275955)

2 *maurice@pessahgroup.com*

3 ELI MELAMED (SBN: 301790)

4 *emelamed@pessahgroup.com*

5 JOSH RUBINTON (SBN: 362785)

6 *jrubinton@pessahgroup.com*

7 **PESSAH LAW GROUP, PC**

8 9100 Wilshire Blvd., Suite 850E

9 Beverly Hills, CA 90212

10 Tel. (310) 772-2261

11 Attorneys for Claimant

12 AMAZING GRACE MOVIE, LLC

13 **JAMS**

14 AMAZING GRACE MOVIE, LLC, a
15 California Limited Liability Company,

16 Claimant,

17 vs.

18 ANDREW MAYORAS, as
19 Representative of the ESTATE OF
20 ARETHA FRANKLIN; KECALF
21 FRANKLIN, in his personal capacity;
22 ROES 1-50,

23 Respondents.

Case No. 5345000713

24 **DECLARATION OF MAURICE D.**
25 **PESSAH IN SUPPORT OF**
26 **CLAIMANT'S MOTION TO**
27 **ENFORCE INTERIM AWARD**

1 5. Having received no response from Respondent, I followed up by email
2 on November 21, 2025, and was informed that Respondent and his counsel were
3 unavailable. Attached herein as **Exhibit B** is a true and correct copy of my
4 November 21, 2025 email and the subsequent response indicating Respondent's
5 unavailability.

6 6. Subsequently, on November 24, 2025, I called Respondent's counsel,
7 seeking to ensure that all necessary permissions were obtained. Respondent's
8 counsel again informed me that they were unavailable for a conversation and would
9 instead provide a response on Tuesday, November 25, 2025. I stressed the urgency
10 of the situation and summarized my prior attempts to contact Respondent. At that
11 time, the Estate did not raise any issues related to Springtime Music, Inc ("SMI").

12 7. On Tuesday, November 25, 2025, I received an email from Brian
13 Caplan asserting that SMI "separately owns and controls the PA copyright interest
14 in the arrangement of Amazing Grace at issue and the synchronization licensing
15 rights related thereto." Mr. Caplan further claimed that he had "been informed that
16 SMI will be offering a synchronization license to the producers of the Melania
17 Trump documentary for a proposed fee of \$200,000." Attached herein as **Exhibit**
18 **C** is a true and correct copy of the November 25, 2025 email sent by Brian Caplan.

19 8. On November 25, 2025, the same day Brian Caplan informed me of
20 Respondent's new position, Doug Colton sent an email to David Fritz, counsel for
21 the producers of the *Melania* Documentary, seeking \$200,000 for the issuance of a
22 synchronization license. Notably, the language of Mr. Colton's email was nearly
23 identical to the language used by Mr. Caplan in his November 25, 2025 email.
24 Attached herein as **Exhibit D** is a true and correct copy of the November 25, 2025
25 email sent by Mr. Colton.

26 9. Recognizing the close ties between Respondent and SMI, I conducted
27 a search through the Michigan Secretary of State website and discovered that the
28 Estate of Aretha Franklin is listed as the president, secretary, treasurer, and director

1 of SMI. I also discovered that Andrew Mayoras is identified as the registered agent
2 for SMI. Attached herein as **Exhibit E** is a true and correct screenshot of the
3 Michigan Secretary of State information relating to SMI.

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6
7 I declare under the penalty of perjury of the laws of the State of California
8 that the foregoing is true and correct.

9 Executed this 3rd day of December, 2025 at Beverly Hills, California.

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Maurice D. Pessah

Exhibit A

From: [Maurice Pessah](#)
To: [Andy Mayoras](#); [Jonathan Colman](#); [Brian D. Caplan](#); [Eli Melamed](#); [Joshua Rubinton](#)
Subject: Amazing Grace Movie, LLC v. Estate of Franklin
Date: Thursday, November 20, 2025 4:09:55 PM

Counsel,

In light of the injunction issued as part of the Emergency Arbitrator's Interim Award (the "Award"), please confirm that all necessary licenses, permissions and authorizations will be issued for Claimant to proceed with the Producer's Offer. Please be advised that any further interference with Claimant's rights, or any violation of the Award, will be aggressively pursued.

Your prompt confirmation, no later than noon (ET) tomorrow, is encouraged.

Maurice D. Pessah
Attorney at Law
PESSAH LAW GROUP, PC

9100 Wilshire Blvd.
Suite 850E
Beverly Hills, CA 90212
Direct. [\(310\) 772-2261](tel:(310)772-2261)
Mobile. [\(310\) 500-8221](tel:(310)500-8221)
maurice@pessahgroup.com

Exhibit B



Joshua Rubinton <jrubinton@pessahgroup.com>

Re: EXT: Re: Amazing Grace Movie, LLC v. Estate of Franklin

Jonathan Colman <JColman@brmmlaw.com>

Fri, Nov 21, 2025 at 8:49 AM

To: Maurice Pessah <maurice@pessahgroup.com>, Andy Mayoras <awmayoras@brmmlaw.com>, "Brian D. Caplan" <bcaplan@reitlerlaw.com>, Eli Melamed <emelamed@pessahgroup.com>, Joshua Rubinton <jrubinton@pessahgroup.com>

Maurice,

Andy and Brian are unavailable today.

Jon

Jonathan M. Colman

Attorney and Counselor

www.brmmlaw.com | jcolman@brmmlaw.com

1301 W. Long Lake Road, Suite 340

Troy, MI 48098

P:248.641.7070

F:248.641.7073

**BARRON, ROSENBERG,
MAYORAS & MAYORAS P.C.**
ESTATE PLANNING | ELDER LAW | FAMILY LAW | PROBATE | LITIGATIONClick [here](#) for my full bio.

This email is confidential, intended for only the recipient(s) named above and may contain information that is privileged, attorney work product or is exempt from disclosure under applicable law. If you have received this message in error or are not the named recipient(s), please immediately notify sender at jcolman@brmmlaw.com and delete this email.

From: Maurice Pessah <maurice@pessahgroup.com>**Date:** Friday, November 21, 2025 at 11:46 AM**To:** Andy Mayoras <awmayoras@brmmlaw.com>, Jonathan Colman <JColman@brmmlaw.com>, Brian D. Caplan <bcaplan@reitlerlaw.com>, Eli Melamed <emelamed@pessahgroup.com>, Joshua Rubinton <jrubinton@pessahgroup.com>**Subject:** EXT: Re: Amazing Grace Movie, LLC v. Estate of Franklin

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Counsel-

Following up.

Maurice D. Pessah
Attorney at Law
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9100 Wilshire Blvd.
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Beverly Hills, CA 90212
Direct. (310) 772-2261
Mobile. (310) 500-8221
maurice@pessahgroup.com

On Nov 20, 2025, at 4:09 PM, Maurice Pessah <maurice@pessahgroup.com> wrote:

Counsel,

In light of the injunction issued as part of the Emergency Arbitrator's Interim Award (the "Award"), please confirm that all necessary licenses, permissions and authorizations will be issued for Claimant to proceed with the Producer's Offer. Please be advised that any further interference with Claimant's rights, or any violation of the Award, will be aggressively pursued.

Your prompt confirmation, no later than noon (ET) tomorrow, is encouraged.

Maurice D. Pessah
Attorney at Law
PESSAH LAW GROUP, PC

9100 Wilshire Blvd.
Suite 850E
Beverly Hills, CA 90212
Direct. (310) 772-2261
Mobile. (310) 500-8221
maurice@pessahgroup.com

Exhibit C

From: [Caplan Brian D.](#)
To: [Maurice Pessah](#)
Cc: [Jonathan Colman](#); [LiCalsi, Paul](#)
Subject: Follow Up
Date: Tuesday, November 25, 2025 11:21:07 AM

Dear Maurice,

As you have already been advised, the Estate of Aretha Franklin will abide by the Interim Award issued by arbitrator Barbara Reeves in the Jams arbitration proceeding(the "Interim Award"), unless and until the award is reversed in subsequent arbitration or legal proceedings. Therefore, the Estate will not withhold consent to the proposed usage by Amazing Grace Movie, LLC. absent future contrary arbitration or court order.

As you know, Springtime Music, Inc. ("SMI") was not a party to the arbitration, and the arbitrator did not address the rights of non-parties to the arbitration. Specifically, in the Interim Award, Arbitrator Reeves stated:

Respondent's argument that Claimant must obtain other consents or licenses from third parties is beyond the scope of this request for emergency relief(see paragraph 58 of the Interim Award); and

Other consents or licenses may or may not be necessary, may or may not have been obtained, and may or may not be required by the producers of the Documentary. As set forth above, that is not before the Emergency Arbitrator in this emergency relief proceeding(see paragraph 78 of the Interim Award).

SMI separately owns and controls the PA copyright interest in the arrangement of Amazing Grace at issue and the synchronization licensing rights related thereto.

Nowhere in the 2019 Settlement Agreement is there an obligation for the Estate to provide a gratis license for the new use of Aretha Franklin's performance of Amazing Grace in the Melania Trump documentary or any other future use.

In light of the foregoing, please be advised that I have been informed that SMI will be offering a synchronization license to the producers of the Melania Trump documentary for a proposed fee of \$200,000, which is the same fee that Warner Music Group has previously quoted the producers for use of the master recording to the song that they own.

Guide yourself accordingly.

Very truly yours, Brian Caplan

Brian D. Caplan

Reitler Kailas & Rosenblatt LLP

885 Third Avenue, 20th Floor

New York, New York 10022

Main: 212-209-3050

Direct: 212-209-3059

Cell: 914-260-8552

Fax: 212-371-5500

Email: bcaplan@reitlerlaw.com

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Exhibit D

----- Forwarded message -----

From: **Doug Colton** <dcolton@sukincoltonlaw.com>

Date: Tue, Nov 25, 2025 at 10:31 PM

Subject: Amazing Grace - Melania documentary

To: dfritz@boyarskifritz.com <dfritz@boyarskifritz.com>, jbrooks@boyarskifritz.com <jbrooks@boyarskifritz.com>

Dear David and Johnna:

Our firm represents Springtime Music, Inc. which controls the right to license Aretha Franklin's arrangement of Amazing Grace ("the Composition"). We are writing to advise you that the Estate of Aretha Franklin ("the Estate") has advised us it is not withholding consent for Amazing Grace Movie, LLC to synchronize its recording (the "Recording") in the Melania Trump Documentary ("the Production"). The Estate will abide by the Interim Award issued by the arbitrator in that regard unless it is overturned. Accordingly, our client is willing to authorize the synchronization of the Composition in the Production on the same economic terms as with respect to the Recording at US \$200,000.

The foregoing is subject to the licensee executing our client's formal license agreement, and obtaining any and all necessary consents, rights and permissions from any third party. Please contact us if you would like to proceed or have any questions.

Best,

Doug Colton

Doug Colton

dcolton@sukincoltonlaw.com

www.sukincoltonlaw.com



***Sukin
Colton
Law
Association***

New York, London and Nashville

1185 Avenue of the Americas

3rd Floor

New York, New York 10036

212-662-1010

Exhibit E

SPRINGTIME PUBLISHING, INC.

Matched Names: SPRINGTIME MUSIC, INC.
SPRINGTIME MUSIC, INC.

<i>Entity Name</i>	SPRINGTIME PUBLISHING, INC.
<i>Identification #</i>	800232122
<i>Jurisdiction</i>	Michigan
<i>Entity Type</i>	Domestic Profit Corporation
<i>Entity Status</i>	Active
<i>AR Standing</i>	Good
<i>Common Shares</i>	1000
<i>AR Due Date</i>	05/15/2026
<i>Initial Filing Date</i>	04/18/1985
<i>Last Report with Officers and Directors</i>	2019
<i>Resident Agent Name</i>	ANDREW W MAYORAS
<i>Registered Office Street Address</i>	1301 W LONG LAKE ROAD, SUITE 340, TROY, MI 48098
<i>Registered Office Mailing Address</i>	1301 W LONG LAKE ROAD, SUITE 340, TROY, MI 48098
<i>President Name & Address</i>	ESTATE OF ARETHA FRANKLIN C/O 30150 TELEGRAPH ROAD, 444, BINGHAM FARMS, MI 48025
<i>Secretary Name & Address</i>	ESTATE OF ARETHA FRANKLIN C/O 30150 TELEGRAPH ROAD, 444, BINGHAM FARMS, MI 48025
<i>Treasurer Name & Address</i>	ESTATE OF ARETHA FRANKLIN C/O 30150 TELEGRAPH ROAD, 444, BINGHAM FARMS, MI 48025
<i>Directors Names & Addresses</i>	ESTATE OF ARETHA FRANKLIN C/O 30150 TELEGRAPH ROAD, 444, BINGHAM FARMS, MI 48025