

1 INTERROGATORY NO. 13:

2 State the date on which Robert Grant was appointed as a "BBT Trustee" as alleged
3 in paragraph 39 of your complaint.

4 RESPONSE TO INTERROGATORY NO. 13:

5 Discovery and investigation are ongoing in this matter and BBTI reserves the right
6 (but does not undertake) to supplement these responses as it discovers more information.
7 Subject to the foregoing objections, both general and specific, and without waiving any of
8 them, plaintiff BBTI responds to this interrogatory as follows:

9 Robert Grant was officially confirmed as BBT Trustee by the GBC in the Spring of
10 1975 during the annual GBC meetings in Mayapura, West Bengal, India. Defendant Hans
11 Kary attended the GBC meetings and approved the resolution appointing him. Upon
12 information and belief, Ramesvara dasa was previously appointed by Srila Prabhupada as
13 BBT trustee or "acting" BBT trustee some time during the twelve months before the 1975
14 GBC meetings.

15 INTERROGATORY NO. 14:

16 State precisely how ISKCON, Inc. acquired title to the various copyrights registered
17 in the name of Bhaktivedanta Book Trust.

18 RESPONSE TO INTERROGATORY NO. 14:

19 Plaintiff BBTI objects to this interrogatory on the ground that it is vague and
20 ambiguous, including specifically and without limitation with regard to the phrases "state
21 precisely", "acquired title" (which is vague as to what kind of title) and "copyrights" (which
22 is vague in that it does not specify whether it means only federal copyrights under the
23 United States Copyright Act). BBTI objects to this interrogatory to the extent that it calls
24 for the disclosure of any information protected by the attorney-client privilege or attorney
25 work product doctrine. Subject to the foregoing objections, both general and specific, and
26 without waiving any of them, plaintiff BBTI responds to this interrogatory as follows:

27 ISKCON, Inc. did business under the names "Bhaktivedanta Book Trust" and "BBT"
28 from roughly 1971 until 1976. During the relevant time period (1966 through 1976) Srila

1 Prabhupada's books, including all artwork, glossaries and elaborate purports, were "works
2 for hire" created by ISKCON, Inc. ISKCON, Inc. owned common law copyrights in them
3 from the time they were created, and became the owner of Federal copyrights as soon as
4 they were published with a copyright notice.

5 BBTI contends that the California trust document dated May 29, 1972 never created
6 a valid trust. However, if it did, and if any of the copyrights ever were owned by that
7 trust, ISKCON, Inc. owned beneficial title to such property because ISKCON, Inc. was the
8 trust beneficiary named in that document.

9 INTERROGATORY NO. 15:

10 Identify the owner of the copyrights which were registered in the name of
11 Bhaktivedanta Book Trust the day before ISKCON, Inc. first acquired title to those same
12 copyrights.

13 RESPONSE TO INTERROGATORY NO. 15:

14 BBTI objects to this interrogatory to the extent that it calls for the disclosure of any
15 information protected by the attorney-client privilege or attorney work product doctrine.
16 BBTI further objects to this interrogatory as compound, vague and ambiguous and
17 unintelligible. The interrogatory apparently asks BBTI to identify the person or entity who
18 owned the copyrights, on the day before ISKCON, Inc. acquired title to them, which, at
19 some time or another, were registered in the name of Bhaktivedanta Book Trust. Or
20 alternatively, it asks BBTI to identify the person or entity who owned the copyrights, on
21 the day before ISKCON, Inc. acquired title to them, which, at that same time, were
22 registered in the name of Bhaktivedanta Book Trust. Or yet alternatively, it asks BBTI to
23 identify the present owner of those copyrights which, on the day before ISKCON, Inc. first
24 acquired title to them, were registered in the name of Bhaktivedanta Book Trust. Another
25 alternative meaning, which BBTI rejects as absurd, is that the interrogatory refers to works,
26 the registrations for which were filed on the day before ISKCON Inc. became the owner.
27 BBTI also objects to the interrogatory on the ground that it appears to be based upon an
28 erroneous assumption that someone other than ISKCON, Inc. owned certain copyrights that

1 were registered in the name of Bhaktivedanta Book Trust on the day before ISKCON, Inc.
2 owned those copyrights. BBTI further objects to this interrogatory as vague and ambiguous
3 with respect to whether by "copyrights" it means copyrights under the U.S. Copyright Act
4 and whether "registered" refers to registration with the U.S. Copyright Office (BBTI
5 assumes that is what "registered" means).

6 Subject to the foregoing objections, both general and specific, and without waiving
7 any of them, plaintiff BBTI responds to this interrogatory as follows: For works created
8 by ISKCON, Inc. after July 1966, ISKCON, Inc. became the owner of common law
9 copyrights at the moment they were created. Of these works, those that were published
10 with notice before the copyrights were transferred in 1976 to ISKCON of California
11 became protected by federal copyrights owned by ISKCON, Inc. from the time of each
12 such publication. Some works also apparently were donated to ISKCON, Inc. by other
13 parties. ISKCON Press and ISKCON Books were not separate entities but were divisions
14 of ISKCON, Inc., as was "Bhaktivedanta Book Trust". Works in which Srila Prabhupada
15 owned federal or common law copyrights in his own name were donated to the Indian Trust
16 on or about March 30, 1972, but others, which were actually owned by ISKCON, Inc.,
17 could not be donated by Srila Prabhupada (as they were owned by the corporation,
18 ISKCON, Inc.) All valid copyrights ever registered in the name of "Bhaktivedanta Book
19 Trust" in the U.S. Copyright office are today owned by Plaintiff BBTI, and no other
20 person.

21 INTERROGATORY NO. 16:

22 Identify the owner of the copyrights which were registered in the name of
23 Bhaktivedanta Book Trust on May 30, 1972.

24 RESPONSE TO INTERROGATORY NO. 16:

25 BBTI objects to this interrogatory to the extent that it calls for the disclosure of any
26 information protected by the attorney-client privilege or attorney work product doctrine.
27 BBTI objects to this interrogatory on the ground that it is vague and ambiguous with
28 respect to the word "registered". BBTI assumes this refers to copyright registrations with

1 the United States Copyright office. BBTI objects to this interrogatory on the ground that
2 it is vague and ambiguous as to time, in that it could seek the identity of the present owner
3 of copyrights that, on May 30, 1972, were registered in the name of "Bhaktivedanta Book
4 Trust", or alternatively could seek the owner as of May 30, 1972, of copyrights which at
5 one time or another were registered in that name (other alternative meanings exist).
6 Discovery and investigation are ongoing in this matter and BBTI reserves the right (but
7 does not undertake) to supplement these responses as it discovers more information.

8 Subject to all the foregoing objections, both general and specific, BBTI responds as
9 follows: BBTI is informed and believes that no copyrights were registered with the United
10 States Copyright Office in the name of Bhaktivedanta Book Trust on May 30, 1972. All
11 valid copyrights ever registered in the name of "Bhaktivedanta Book Trust" in the U.S.
12 Copyright office are today owned by Plaintiff BBTI, and no other person.

13 INTERROGATORY NO. 17:

14 Identify the owner of the copyrights which were registered in the name of
15 Bhaktivedanta Book Trust on December 31, 1972.

16 RESPONSE TO INTERROGATORY NO. 17:

17 BBTI objects to this interrogatory to the extent that it calls for the disclosure of any
18 information protected by the attorney-client privilege or attorney work product doctrine.
19 BBTI objects to this interrogatory on the ground that it is vague and ambiguous with
20 respect to the word "registered". BBTI assumes this refers to copyright registrations with
21 the United States Copyright office. BBTI further objects to this interrogatory as compound,
22 vague as to time, ambiguous and unintelligible, in that it is not clear whether it seeks the
23 owner as of December 31, 1972 or the present owner.

24 Subject to all the foregoing objections, both general and specific, and without
25 waiving any of them, BBTI responds as follows: On December 31, 1972, either ISKCON,
26 Inc. or the Indian Trust; currently, Plaintiff BBTI.