

NOTICE

Round Hill Music, LP, Round Hill Music Royalty Fund II LP, and Artists Rights Management LLC (collectively “Plaintiffs”) bring this action against Bobby Ray Simmons, Jr. *p/k/a* B.o.B. and Bobby Ray Touring Inc. (collectively “Defendants”) for breach of contract and for foreclosure under the New York Uniform Commercial Code (“NY UCC”).

Defendants entered into an Assignment Agreement and Security Agreement with RAZOR/TEI I LLC (“RAZOR/TEI”), both dated January 1, 2017. The Assignment Agreement granted RAZOR/TEI all right, title and interest to collect certain royalties from the public performance of all sound recordings featuring Bobby Ray Simmons, Jr. *p/k/a* B.o.B. The Security Agreement granted RAZOR/TEI a first-priority security interest in certain rights associated with the sound recording performance rights and revenues described in the Acquisition Agreement. RAZOR/TEI filed a valid UCC Financing Statement on May 16, 2017 (attached hereto as Exhibit A). Subsequently, RAZOR/TEI transferred its rights under the Acquisition Agreement and Security Agreement to Artists Rights Management LLC, and Artists Rights Management LLC was thereafter acquired by Round Hill Music Royalty Fund II LP.

In an intentional violation of the Assignment Agreement, Defendants have prevented Plaintiffs from collecting the royalties that Plaintiffs are contractually entitled to collect. Defendants’ breach of the Assignment Agreement also constitutes an Event of Default under the terms of the Security Agreement, giving Plaintiffs the right to exercise all remedies provided for in the Security Agreement and by Article 9 of the New York Uniform Commercial Code.

Plaintiffs now bring this action to reduce their security interest to judgment and to collect damages they have suffered as a result of Defendants’ willful and intentional breach of the Assignment Agreement of at least \$3,000,000, together with attorneys’ fees, costs, and expenses.

Upon your failure to appear, judgment will be taken against you by default for the judgment sought, and for money damages in a sum that is no less than \$3,000,000, plus attorneys' fees, costs and expenses, as well as interest (if any) as provided by statute.

Dated: May 26, 2022
New York, New York

/s/ Joshua I. Schiller _____
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