**ANNOTATIONS AND COMMENTS**

17 U.S.C. § 507; *Calhoun v. Lillenas Publ’g*, 298 F.3d 1228, 1236 (11th Cir. 2002) (Birch, J., specially concurring), *cert. denied*, 539 U.S. 903, 123 S. Ct. 2251 (2003).