

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION**

<b>In re:</b>  <b>LOCAL FIRST MEDIA GROUP INC.</b>  <b>Debtor in a foreign proceeding.</b>	<b>Case No. 25-41368</b>  <b>Chapter 15</b>
<b>In re:</b>  <b>LOCAL FIRST PROPERTIES INC.,</b>  <b>Debtor in a foreign proceeding.</b>	<b>Case No. 25-41369</b>  <b>Chapter 15</b>
<b>In re:</b>  <b>BTC USA HOLDINGS MANAGEMENT INC.,</b>  <b>Debtor in a foreign proceeding.</b>	<b>Case No. 25-50050</b>  <b>Chapter 15</b>
<b>In re:</b>  <b>LOCAL FIRST PROPERTIES USA INC.,</b>  <b>Debtor in a foreign proceeding.</b>	<b>Case No. 25-50051</b>  <b>Chapter 15</b>
<b>In re:</b>  <b>ALASKA BROADCAST COMMUNICATIONS, INC.,</b>  <b>Debtor in a foreign proceeding.</b>	<b>Case No. 25-50052</b>  <b>Chapter 15</b>
<b>In re:</b>  <b>BROADCAST 2 PODCAST, INC.,</b>  <b>Debtor in a foreign proceeding.</b>	<b>Case No. 25-50053</b>  <b>Chapter 15</b>

In re:

FRONTIER MEDIA LLC,

Debtor in a foreign proceeding.

Case No. 25-50054

Chapter 15

**NOTICE OF (I) FILING OF PETITIONS PURSUANT TO CHAPTER 15 OF THE BANKRUPTCY CODE; (II) DEADLINE TO OBJECT TO ENTRY OF RECOGNITION ORDER AND MOTION FOR JOINT ADMINISTRATION; AND (III) HEARING FOR COURT TO CONSIDER CHAPTER 15 PETITIONS, ENTRY OF RECOGNITION ORDER AND THE MOTION FOR JOINT ADMINISTRATION**

**PLEASE TAKE NOTICE** that on May 13, 2025, FTI Consulting Canada Inc. (“FTI”), solely in its capacity as court-appointed receiver (in such capacity, the “**Receiver**”) of the above-captioned debtors (collectively, the “**Debtors**”), based upon the Receivership Order dated February 21, 2025 (the “**Receivership Order**”)<sup>1</sup> entered by the Court of King’s Bench of Alberta in the Calgary Courts Centre, Calgary, Alberta, Canada, Court File No. 501-01744 (the “**Canadian Court**” and the “**Canadian Proceeding**”) filed petitions (collectively, the “**Chapter 15 Petitions**”) under chapter 15 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), commencing the Debtors’ chapter 15 cases (collectively, the “**Chapter 15 Cases**”) ancillary to the Canadian Proceedings, with the United States Bankruptcy Court for the Eastern District of Texas (the “**Court**”).

**PLEASE TAKE FURTHER NOTICE** that the Debtors have filed a motion in the Chapter 15 Cases requesting that the Chapter 15 Cases be jointly administered for procedural purposes only (the “**Joint Admin Motion**”).

**PLEASE TAKE FURTHER NOTICE** that the Receiver has filed the *Verified Petition For Recognition As Foreign Main Proceedings, Or Alternatively As Foreign Nonmain Proceedings, Pursuant To Sections 1515 And 1517 Of The United States Bankruptcy Code And Related Relief And (II) Authorizing Receiver’s Use Of Cash Collateral* (the “**Verified Petition**”), requesting that the Court enter a final order (the “**Recognition Order**”), after notice and a hearing, (a) granting recognition of the Canadian Proceedings as foreign main proceedings, or, in the alternative, as foreign nonmain proceedings, under section 1517 of the Bankruptcy Code, (b) enforcing the Receivership Order on a permanent basis in the United States and (c) granting such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that the Court has scheduled a hearing for **June 16, 2025 at 9:30 a.m. (prevailing Central Time)** with respect to the Verified Petition and the Joint Admin Motion (the “**Recognition Hearing**”). The Hearing will be held before the Honorable Brenda T. Rhoades at the United States Bankruptcy Court for Eastern District of Texas, 660 North Central Expressway, Suite 300B, Plano, Texas 75074.

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<sup>1</sup> A true and correct copy of the Receivership Order can also be downloaded free of charge at FTI’s website: <http://cfcanada.fticonsulting.com/LocalFirst/>.

**PLEASE TAKE FURTHER NOTICE** that that responses or objections to the Joint Admin Motion, recognition of the Canadian Proceeding as a foreign main proceedings, or the Verified Petition and the relief requested therein must: (i) be in writing; (ii) detail the factual and legal basis for the response or objection; (iii) comply with the Bankruptcy Code, the Federal Rules or Bankruptcy Procedure, and the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the Eastern District of Texas; and (iv) be filed with the Office of the Clerk of the Court, 660 North Central Expressway, Suite 300B, Plano, Texas 75074, and served upon the following **so as to be received at least seven (7) days prior to the Recognition Hearing**: (a) the Receiver, FTI Consulting Canada Inc., 1610, 520 – 5th Ave S.W. Calgary, AB T2P 3R7 Canada, Attn: Lindsay Shierman; and (b) counsel to the Receiver, Norton Rose Fulbright US LLP, 2200 Ross Avenue, Dallas Texas 75201, Attn: Kristian Gluck, Steve Peirce and Michael Berthiaume.

**PLEASE TAKE FURTHER NOTICE** that copies of the Chapter 15 Petitions, the Verified Petition, the Recognition Order, the Joint Admin Motion and other documents filed by the Receiver may be obtained by visiting the Court's website at <http://www.ecf.txeb.uscourts.gov> (a PACER login and password are required to retrieve a document) or free of charge at <https://cases.stretto.com/LocalFirstMedia>, or by contacting counsel to the Receiver, Norton Rose Fulbright US LLP (Attn: Michael Berthiaume, (214) 855 8274 or [michael.berthiaume@nortonrosefulbright.com](mailto:michael.berthiaume@nortonrosefulbright.com)).

**PLEASE TAKE FURTHER NOTICE** that **your rights may be affected. You should read the Verified Petition carefully and discuss it with your attorney, if you have one in connection with these Chapter 15 Cases. If you do not have an attorney, you may wish to consult one.**

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Court to grant the relief requested by the Receiver, or if you want the Court to consider your views on any matter requested at the Hearing, then you or your attorney must attend such hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought by the Receiver and may enter an order granting the relief requested.

**PLEASE TAKE FURTHER NOTICE** that the Recognition Hearing may be adjourned from time to time without further notice except for an in-Court announcement at the Recognition Hearing or a filing by the Receiver on the docket of the Chapter 15 Cases of the date and time to which the Recognition Hearing has been adjourned.

Dated: May 16, 2025  
Dallas, Texas

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

By: /s/ Kristian W. Gluck  
Kristian W. Gluck (SBT 24038921)  
kristian.gluck@nortonrosefulbright.com  
Michael Berthiaume (SBT 24129008)  
(pro hac vice pending)  
michael.berthiaume@nortonrosefulbright.com  
2200 Ross Avenue, Suite 3600  
Dallas, Texas 75201-7932  
Telephone: (214) 855-8000  
Facsimile: (214) 855-8200

and

Steve A. Peirce (SBT 15731200)  
(admitted *pro hac vice*)  
steve.peirce@nortonrosefulbright.com  
111 West Houston Street, Suite 1800  
San Antonio, TX 78205  
Telephone: (210) 224-5575  
Facsimile: (210) 270-7205

*Counsel to FTI Consulting Canada Inc., solely in its  
capacity as court-appointed receiver of the Debtors*

**CERTIFICATE OF SERVICE**

I hereby certify that contemporaneously with the filing of the foregoing, I directed the Receiver's noticing agent to serve a copy of the foregoing on parties in interest in this case. The Receiver will supplement this certificate of service with proof of service and a copy of such service list.

/s/ Kristian W. Gluck  
Kristian W. Gluck