

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

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

In re:

FRONTIER MEDIA LLC,

Debtor in a foreign proceeding.

Case No. 25-50054

Chapter 15

**MOTION FOR AN ORDER DIRECTING JOINT ADMINISTRATION
OF CASES UNDER CHAPTER 15 OF THE BANKRUPTCY CODE**

Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney, if you have one in this bankruptcy case. If you oppose the relief sought by this pleading, you must file a written objection, explaining the factual and/or legal basis for opposing the relief. No hearing will be conducted on this Motion unless a written objection is filed with the Clerk of the United States Bankruptcy Court and served upon the party filing this pleading **WITHIN TWENTY ONE (21) DAYS FROM THE DATE OF SERVICE** shown in the certificate of service unless the Court shortens or extends the time for filing such objection. If no objection is timely served and filed, this pleading shall be deemed to be unopposed, and the Court may enter an order granting the relief sought. If an objection is filed and served in a timely manner, the Court will thereafter set a hearing with appropriate notice. If you fail to appear at the hearing, your objection may be stricken. The Court reserves the right to set a hearing on any matter.

Now comes FTI Consulting Canada Inc. (“**FTI**”) solely in its capacity as court-appointed receiver (in such capacity, the “**Receiver**” or “**Foreign Representative**”) of the above-captioned debtors (collectively, the “**Debtors**”), based upon the Receivership Order dated February 21, 2025 (the “**Receivership Order**”)¹ 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**”), and as authorized foreign representative of the Debtors, by and through its undersigned counsel, and respectfully files this motion (the “**Motion**”) for an entry of an order, pursuant to sections 105(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 1015-1 of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the Eastern District of Texas (“**Local Rules**”) authorizing and directing the joint

¹ A true and correct copy of the Receivership Order is attached to the Official Form 401 Petition and can also be downloaded free of charge at FTI’s website: <http://cfcanda.fticonsulting.com/LocalFirst/> and is incorporated herein for all purposes.

administration of the Debtors' related Chapter 15 cases for procedural purposes only. In support of this Motion, the Receiver relies on 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 Authorizing Receiver's Use of Cash Collateral* (the "**Verified Petition**"),² filed contemporaneously herewith, and respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1334 and 157, and 11 U.S.C. § 1501 of the Bankruptcy Code.
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
3. Venue is properly located in this District pursuant to 28 U.S.C. § 1410.
4. The statutory predicates for the relief requested herein are section 105(a) of the Bankruptcy Code, along with Bankruptcy Rule 1015(b) and Local Rule 1015-1.

BACKGROUND

5. There are seven affiliated Debtors who are the subject of the Canadian Proceeding and these Chapter 15 Cases: (a) Local First Media Group Inc. ("**Local First Media**"), an Alberta Canada corporation with its registered office at 671-180 Street SW, Edmonton, AB T6W 2S8; (b) Local First Properties Inc. ("**Local First Properties**"), an Alberta Canada corporation with its registered office at 671-180 Street SW, Edmonton, AB T6W 2S8; (c) BTC USA Holdings Management Inc ("**BTC USA**"), a Delaware corporation with its registered office at 3161 Channel Dr., #2, Juneau, AK 99801; (d) Local First Properties USA Inc. ("**Local First USA**"), a Delaware

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Verified Petition.

corporation with its registered office at 3161 Channel Dr., #2, Juneau, AK 99801; (e) Alaska Broadcast Communications, Inc. (“**Alaska Broadcast**”), an Alaska corporation with its registered office at 3161 Channel Dr., #2, Juneau, AK 99801; (f) Broadcast 2 Podcast, Inc. (“**B2P**”), a California corporation with its registered office at 14206 Barbon Beck Avenue, Bakersfield, CA 93311; and (g) Frontier Media LLC (“**Frontier**”), an Alaska Limited Liability Company with its registered office at 3161 Channel Dr., #2, Juneau, AK 99801

6. The Debtors are a group of primarily Canadian-based companies operating radio stations in the United States. Together, the seven Debtors own the radio stations, the associated equipment and other personal property required to operate the radio stations, and the real estate and associated improvements, including certain buildings and cell towers.

7. On February 21, 2025, the Receivership Order was pronounced by the Honourable Justice M.J. Lema, and was filed with the Canadian Court on February 26, 2025. Among other things, the Receivership Order provides that the Receiver may apply to a Court in the US for recognition of the Receivership Order and respectfully requests that Courts in jurisdictions outside Canada recognize the Receivership Order and aid and assist to assist the Receiver and the Canadian Court.

8. On the Petition Date, the Receiver filed Official Form No. 401 Chapter 15 petitions for each of the Debtors pursuant to 11 U.S.C. § 1504, 1509(a) and 1515(a). The Receiver commenced these ancillary proceedings with respect to the Debtors under Chapter 15 of the Bankruptcy Code to obtain recognition of the Canadian Proceeding. The Receiver contends that these Chapter 15 Cases will complement the primary proceedings with respect to the Debtors and their property in Canada and the United States to ensure the effective and economic administration of the Debtors’ restructuring efforts and prevent adverse actions in the United States.

9. The Receiver intends to commence a sale process for the Debtors' business and assets through the Canadian proceeding, and these Chapter 15 Cases serve a critical role in that effort for the benefit of all creditors.

RELIEF REQUESTED

10. By this Motion, the Receiver respectfully requests entry of an order, substantially in the form annexed hereto as **Exhibit A**, directing the joint administration of the Chapter 15 Cases for procedural purposes only.

11. The Receiver also requests that the caption of the Chapter 15 Cases be modified to reflect the joint administration of the Chapter 15 Cases, substantially as follows:

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

In re:	§	
	§	Case No. 25-41368
LOCAL FIRST MEDIA GROUP INC.	§	
	§	Chapter 15
Debtor in a foreign proceeding.³	§	
	§	Joint Administered

12. No party shall be required to list any further information beyond the information set forth above in any pleadings filed in these Chapter 15 Cases.

13. In addition, the Receiver requests that the Court authorize and direct that the following notation be entered on the docket in these Chapter 15 Cases to reflect the joint administration of these Chapter 15 Cases:

³ The Debtors in these chapter 15 cases (the "**Chapter 15 Cases**"), along with the last four digits of each Debtor's unique identifier under Question 2 of each Form 401, are Local First Media Group Inc. (1809); Local First Properties Inc. (9206); BTC USA Holdings Management Inc (1330); Local First Properties USA Inc. (8415); Alaska Broadcast Communications, Inc. (377D); Broadcast 2 Podcast, Inc. (8516); and Frontier Media LLC (4593).

An Order has been entered in this case directing the joint administration of the Chapter 15 cases of the above captioned debtors. The docket in Case No. 25-41368 should be consulted for all matters affecting this case.

14. Further, the Receiver requests that the Court authorize the Receiver to use a combined service list for the jointly administered Chapter 15 Cases and that combined notices be sent to creditors of the Debtors' estates and other parties-in-interest, as applicable, and subject to the relief requested in the Notice Procedures Motion.

BASIS FOR RELIEF REQUESTED

15. Bankruptcy Rule 1015(b) provides, in relevant part, that if "two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates." Fed. R. Bankr. P. 1015(b). In this instance, the Debtors are "affiliates" within the meaning of section 101(2) of the Bankruptcy Code, and accordingly, this Court has authority to grant the relief requested herein.

16. Additionally, Local Rule 1015-1 provides that this Court may order joint administration upon the filing of a motion requesting such joint administration.

17. The Verified Petition establishes that joint administration of the Chapter 15 Cases: (i) is warranted because the Debtors' financial affairs and business operations are closely related, and (ii) will ease the administrative burden of such cases on the Court and the various interested parties.

18. The Receiver anticipates that the various notices, motions, hearings, orders and other pleadings in the Chapter 15 Cases will affect all of the Debtors. With multiple Debtors, each with its own case docket, the failure to jointly administer the Chapter 15 Cases would result in duplicative pleadings filed for each issue and served upon separate service lists. Such duplication of substantially identical documents would be wasteful and would unnecessarily burden the Clerk of this Court (the "**Clerk**").

19. Joint administration will permit the Clerk to use a single docket for each of the Chapter 15 Cases and to combine notices to creditors and other parties-in-interest of the Debtors. Joint administration also will protect parties-in-interest in these Chapter 15 Cases by ensuring that the Receiver will be apprised of the various matters before the Court in each of the Chapter 15 Cases. The Receiver submits that use of the simplified caption, in the form set forth above, by all parties-in-interest will eliminate cumbersome and confusing procedures and ensure uniformity of pleading identification.

20. Furthermore, the interests of creditors will not be adversely affected because this motion requests only administrative consolidation of the Chapter 15 Cases. All creditors and other parties in interest will retain whatever claims, interests, or other rights they have in or against each Debtor and its estate. Indeed, the joint administration of the Chapter 15 Cases will ensure that all creditors may look to one bankruptcy case docket to file any appropriate pleadings.

21. In accordance with Local Rule 1015-1(c)(3), the Debtors submit that the practicalities of providing professional services to the jointly administered estates would preclude any professional person employed by the Debtors from effectively or accurately separating the services rendered the benefit of one bankruptcy estate vis a vis another. Rather, tasks performed by professional persons will largely benefit the estates as a unit rather than one bankruptcy estate individually. Thus, submission of a consolidated application for compensation filed solely in the main bankruptcy case would align with the interests of judicial economy and convenience for all parties.

CONCLUSION

WHEREFORE, the Receiver respectfully requests that the Court grant the Motion and enter an order authorizing the joint administration of the Chapter 15 Cases and granting such other and further relief as the Court deems appropriate.

Dated May 13, 2025

Respectfully submitted,

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ATTORNEYS FOR CANADIAN RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that contemporaneously with the filing of the foregoing, I directed noticing agent Stretto 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

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

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

In re:

FRONTIER MEDIA LLC,

Debtor in a foreign proceeding.

Case No. 25-50054

Chapter 15

**ORDER DIRECTING JOINT ADMINISTRATION
OF CASES UNDER CHAPTER 15 OF THE BANKRUPTCY CODE**

On the Petition Date, the *Motion For An Order Directing Joint Administration Of Cases Under Chapter 15 Of The Bankruptcy Code* (the “**Motion**”) was filed by FTI Consulting Canada Inc. (“**FTI**”) solely in its capacity as court-appointed receiver (in such capacity, the “**Receiver**” or “**Foreign Representative**”) of the above-captioned debtors (collectively, the “**Debtors**”), in the above-referenced case, which seeks entry of an order, pursuant to sections 105(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 1015-1 of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the Eastern District of Texas (“**Local Rules**”) authorizing and directing the joint administration of the Debtors’ related Chapter 15 cases for procedural purposes only.

The Court finds that the Motion was properly served pursuant to the Federal and Local Rules of Bankruptcy Procedure and that it contained the appropriate notice language, pursuant to LBR 9007. The Court finds that no objection or other written response to the Motion has been timely filed by any party. Due to the failure of any party to file a timely written response, the allegations contained in the Motion stand unopposed and, therefore, the Court finds that good cause exists for the entry of the following order.

IT IS THEREFORE ORDERED that the Motion filed by the Receiver is hereby **GRANTED** as set forth herein:

1. The Motion is granted to authorize the joint administration of the Chapter 15 Cases for procedural purposes only

2. The caption of the Chapter 15 Cases shall be modified to reflect the joint administration of the Chapter 15 Cases, substantially as follows:

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

In re:	§	
	§	
LOCAL FIRST MEDIA GROUP INC.	§	Case No. 25-41368
	§	
Debtor in a foreign proceeding.¹	§	Chapter 15
	§	
	§	Joint Administered

3. No party shall be required to list any further information beyond the information set forth above in any pleadings filed in these Chapter 15 Cases.

4. The following notation shall be entered on the docket in these Chapter 15 Cases to reflect the joint administration of these Chapter 15 Cases:

An Order has been entered in this case directing the joint administration of the Chapter 15 cases of the above captioned debtors. The docket in Case No. 25-41368 should be consulted for all matters affecting this case.

5. The Receiver is authorized to use a combined service list for the jointly administered Chapter 15 Cases and combined notices may be sent to creditors of the Debtors' estates and other parties-in-interest, as applicable.

¹ The Debtors in these chapter 15 cases (the "**Chapter 15 Cases**"), along with the last four digits of each Debtor's unique identifier under Question 2 of each Form 401, are Local First Media Group Inc. (1809); Local First Properties Inc. (9206); BTC USA Holdings Management Inc (1330); Local First Properties USA Inc. (8415); Alaska Broadcast Communications, Inc. (377D); Broadcast 2 Podcast, Inc. (8516); and Frontier Media LLC (4593).