

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

<b>In re:</b>	§	
	§	<b>Case No. 25-41368</b>
<b>LOCAL FIRST MEDIA GROUP INC.</b>	§	
	§	<b>Chapter 15</b>
<b>Debtor in a foreign proceeding.<sup>1</sup></b>	§	
	§	<b>Joint Administration Requested</b>

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**APPLICATION OF MICHAEL BERTHIAUME FOR ADMISSION *PRO HAC VICE* TO  
REPRESENT FTI CONSULTING CANADA INC., SOLELY IN ITS CAPACITY AS  
COURT-APPOINTED RECEIVER OF THE DEBTORS**

1. This application is being made for the following: Case No. 25-41368, and all related cases for the Debtors and related adversary proceedings.
2. Applicant is representing FTI Consulting Canada Inc., solely in its capacity as court-appointed receiver of the Debtors.
3. Applicant has been admitted to practice in Texas since 2021.
4. Applicant is in good standing and is otherwise eligible to practice law before this Court.
5. Applicant is not currently suspended or disbarred in any other court.
6. Applicant has not had an application for admission to practice before another court denied.
7. Applicant has not ever had the privilege to practice before another court suspended.

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<sup>1</sup> 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).

8. Applicant has not been disciplined by a court or Bar Association or committee thereof that would reflect unfavorably upon applicant's conduct, competency or fitness as a member of the Bar.

9. Applicant has no history of charges, arrests, or convictions for criminal offenses.

10. There are no pending grievances or criminal matters pending against the applicant.

11. Applicant has been admitted to practice in the following courts: United States Bankruptcy for the Northern District of Texas; United States Bankruptcy for the Southern District of Texas.

12. Applicant has read and will comply with the Local Rules of the Eastern District of Texas, including Rule AT-3, the "Standards of Practice to be Observed by Attorneys."

13. Applicant understands that he is being admitted for the limited purpose of appearing in the cases specified above only in paragraph 1.

**Application Oath:**

I, Michael Berthiaume, do solemnly swear that the above information is true; that I will discharge the duties of an attorney and counselor of this court faithfully; that I will demean myself uprightly under the law and the highest ethics of our profession; and that I will support and defend the Constitution of the United States.

Dated: May 14, 2025

/s/ Michael Berthiaume

Michael Berthiaume

Name: Michael Berthiaume  
Bar Number/State: 24129008/Texas  
Firm Name: Norton Rose Fulbright US LLP  
Address: 2200 Ross Avenue, Suite 3600  
City/State/Zip: Dallas, Texas 75201  
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Email: michael.berthiaume@nortonrosefulbright.com

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 14, 2025, a true and correct copy of the foregoing document was served electronically by the Court's PACER system, and I have directed noticing Agent Stretto to serve the foregoing on parties in interest. 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

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT  
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<b>In re:</b>	§	
	§	<b>Case No. 25-41368</b>
<b>LOCAL FIRST MEDIA GROUP INC., et</b>	§	
<b>al.,<sup>1</sup></b>	§	<b>Chapter 15</b>
	§	
<b>Debtors in a foreign proceeding.</b>	§	<b>Joint Administration Requested</b>

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**ORDER APPROVING APPLICATION OF MICHAEL BERTHIAUME FOR  
ADMISSION *PRO HAC VICE***

On May 14, 2025, an application was filed by Michael Berthiaume (the “Applicant”) for admission to practice before this Court pro hac vice (the “Application”) in the above-referenced Case and related cases. The Court has reviewed the Application and finds that the Application substantially complies with the requirements of the Local Rules regarding admission on a pro hac vice basis. Accordingly, good cause exists for the entry of the following order:

IT IS THEREFORE ORDERED that the Application for **Pro Hac Vice** Admission filed on April , 2025, by Michal Berthiaume is GRANTED, subject to the requirement that all attorneys admitted to practice before this Court shall file all documents by electronic means pursuant to General Order 04-1, a copy of which may be reviewed at [www.txeb.uscourts.gov](http://www.txeb.uscourts.gov).

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