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

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| **In re:** | § | |
| | § | **Case No. 25-41368** |
| **LOCAL FIRST MEDIA GROUP INC., *et al.*,[1]** | § | |
| | § | **Chapter 15** |
| | § | |
| **Debtors in a foreign proceeding.** | § | **Jointly Administered** |

**NOTICE OF FOREIGN REPRESENTATIVE'S MOTION PURSUANT TO SECTIONS 105(a), 363, 365, 1501, 1507, 1520, AND 1521 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002, 6004, 6006, AND 9014, FOR ENTRY OF AN ORDER (I) RECOGNIZING AND ENFORCING THE APPROVAL AND VESTING ORDERS, (II) APPROVING THE SALE OF CERTAIN OF THE DEBTORS' ALASKA AND TEXARKANA ASSETS FREE AND CLEAR OF LIENS, CLAIMS, AND ENCUMBRANCES, (III) ASSUMING AND ASSIGNING CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES AND (IV) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE OF THE FOLLOWING**:

On November 11, 2026, FTI Consulting Canada Inc. ("FTI"), solely in its capacities as the court-appointed receiver and as authorized foreign representative (in such capacities, 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")[2] entered by the Court of King's Bench of Alberta in the Calgary Courts Centre, Calgary, Alberta, Canada, Court File No. 2501-01744 (the "Canadian Court" and the "Canadian Proceeding"), filed a motion ("Motion") pursuant to sections 105(a), 363, 365, 1501, 1507, 1520, and 1521 of title 11 of the United States Code (the "Bankruptcy Code"), Rules 2002, 6004, 6006, and 9014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 6004-1 of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the Eastern District of Texas (the "Local Rules"), requesting (a) an order (the "Texarkana Order") (i)(1) recognizing and giving effect in the United States to the *Order re Sale Approval and Vesting Order* authorizing the Sale of the Texarkana Assets (the "Texarkana Approval and Vesting Order;") and (2) approving, under section 363 of the Bankruptcy Code, the sale of the Debtors' right, title, and interest in and to the Texarkana Assets to the Texarkana Buyer pursuant to the Texarkana APA (each as defined in the Motion), free and clear of all liens, claims, encumbrances,

[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).

[2] A true and correct copy of the Receivership Order is annexed to the Official Form 401 Petition, can be downloaded free of charge at FTI's website: https://cfcanada.fticonsulting.com/LocalFirst/courtOrders.htm and is incorporated herein for all purposes.

and other interests (other than the Assumed Liabilities (as defined in the Texarkana APA)); (ii) approving the assumption and assignment of certain executory contracts and unexpired leases (the "Assumed Contracts"); and (iii) granting related relief.

Copies of the Motion, the Texarkana APA (including the list of Assumed Contracts), the proposed Texarkana Approval and Vesting Order and other documents filed by the Foreign Representative 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 the Foreign Representative's restructuring website at https:// https://cases.stretto.com/LocalFirstMedia/court-docket/, or by contacting counsel to the Foreign Representative, Norton Rose Fulbright US LLP (Attn: Michael Berthiaume, (214) 855 8274 or michael.berthiaume@nortonrosefulbright.com).

Any response or objection to entry of an order with respect to the relief sought in the Motion **must be filed with the Bankruptcy Court and served upon and received by the undersigned counsel no later than twenty-one (21) days after notice of the Motion is served** and must: (i) be in writing; (ii) state the name and address of the objecting party and the amount and nature of the claim or interest of such party; (iii) state with particularity the basis and nature of any objection, and, to the extent applicable, provide proposed language that, if accepted and incorporated by the Foreign Representative, would obviate such objection; (iv) comply with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules; and (v) be **filed with the Office of the Clerk of the Court, 660 North Central Expressway, Suite 300B, Plano, Texas 75074, served, and *actually received* by counsel to the Foreign Representative (Norton Rose Fulbright US LLP, 2200 Ross Avenue, Suite 3600, Dallas, Texas 75201-7932, Attn: Kristian Gluck and Michael Berthiaume) no later than twenty-one (21) days after notice is served**.

Pursuant to the Motion, the Foreign Representative seeks the Bankruptcy Court's approval of the assumption and assignment, pursuant to section 365 of the Bankruptcy Code, of the Assumed Contracts (and the associated Cure Amounts) listed on Schedule 1.6 to the Texarkana APA. To the extent you object to the assumption and/or assignment of an Assumed Contract to which you are a party (including any objection to a Cure Amount), **you must object in accordance with any notice you receive from the Foreign Representative in connection with the approval of the Alaska APA and the Texarkana APA by the Bankruptcy Court in accordance with the foregoing dates, deadlines, and procedures**.

A hearing to consider the relief requested in the Motion will be held before the Honorable Brenda T. Rhoades at the United States Bankruptcy Court for the Eastern District of Texas, VIRTUALLY on December 11, 2026 at 1:30 p.m. (prevailing Central Time). **Parties must email ECRO_Plano@txeb.uscourts.gov to obtain Video Information at least 48 hours prior to the hearing**. Any untimely requests will not be granted. If you fail to appear at the hearing, your objection may be stricken.

All questions or requests to the Foreign Representative in connection with the foregoing must be directed to (a) the Receiver, Attn: Lindsay Shierman (lindsay.shierman@fticonsulting.com) and (b) counsel to the Foreign Representative, Attn: Kristian Gluck (kristian.gluck@nortonrosefulbright.com) and Michael Berthiaume (michael.berthiaume@nortonrosefulbright.com). **All parties are advised to consult with counsel**.

Dated: November 11, 2026

Respectfully submitted,

**NORTON ROSE FULBRIGHT US LLP**

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