

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
ENTERTAINMENT MEDIA TRUST,)	MB Docket No. 19-156
DENNIS J. WATKINS, TRUSTEE)	
)	
Applications to Renew License:)	
)	
KFTK(AM) (formerly WQQX(AM)), East St.)	Facility ID No. 72815
Louis, Illinois)	File No: BR-20120709ACP
)	
WQQW(AM), Highland, Illinois)	Facility ID No. 90598
)	File No. BR-20120709AC0
)	
KZQZ(AM), St. Louis, Missouri)	Facility ID No. 72391
)	File No. BR-20120921AAW
)	
KQQZ(AM), DeSoto, Missouri)	Facility ID No. 5281
)	File No. BR-20120921ABA
)	
Application for Consent to Assignment of)	
Licenses:)	
)	
KFTK(AM) (formerly WQQX(AM)), East St.)	Facility ID No. 72815
Louis, Illinois)	File No: BAL-20160919ADH
)	
WQQW(AM), Highland, Illinois)	Facility ID No. 90598
)	File No. BAL-20160919ADI
)	
KZQZ(AM), St. Louis, Missouri)	Facility ID No. 72391
)	File No. BAL-20160919ADJ
)	
KQQZ(AM), DeSoto, Missouri)	Facility ID No. 5281
)	File No. BAL-0160919ADK
)	
Application for Permit to Construct New)	Facility ID No. 200438
Station:)	File Nos. BNPFT-20170726AEF
)	BNPFT-20180314AAO
W275CS, Highland, Illinois)	

To: Marlene H. Dortch, Secretary
Attn: Administrative Law Judge Jane Hinckley Halprin

**ENFORCEMENT BUREAU'S MOTION FOR LEAVE TO FILE RESPONSE TO
CHAPTER 7 TRUSTEE'S OCTOBER 1, 2019 PLEADING**

1. In *Order*, FCC 19M-05, the Presiding Judge directed the parties to file status reports on the first Tuesday of every month, commencing August 6, 2019.¹ On October 1, 2019, the Chapter 7 Trustee filed a document he styled as a “status report,”² but which contains additional legal argument in further support of the motion to stay this proceeding filed by Entertainment Media Trust, Dennis Watkins, Trustee (EMT). Aside from the fact that this is an unauthorized pleading that violates the Presiding Judge’s *Order*, FCC 19M-10,³ it is riddled with mischaracterizations of the record and misstatements of law. The Enforcement Bureau (Bureau) believes it is in the public interest for the Commission to have a complete and accurate record.

2. Accordingly, the Chief, Enforcement Bureau, through her attorneys, respectfully requests leave to file a response to the Chapter 7 Trustee’s October 1, 2019 filing. A copy of the Bureau’s response is filed concurrently with this Motion.

¹ See *Order*, FCC 19M-05 (ALJ, rel. July 11, 2019), at 2.

² See Letter from Fletcher, Heald & Hildreth filed on behalf of Donald M. Samson (Trustee) (Oct. 1, 2019) (Trustee Filing).

³ See *Order*, FCC 19M-10 (ALJ, rel. Sept. 18, 2019), at 3, para. 3 (“Further pleadings regarding the EMT Motion for Stay will not be permitted.”).

Respectfully submitted,

Rosemary C. Harold
Chief, Enforcement Bureau



Pamela S. Kane
Special Counsel
Investigations and Hearings Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C330
Washington, D.C. 20554
(202) 418-1420

Jeffrey Gee
Division Chief
Investigations and Hearings Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-C330
Washington, D.C. 20554
(202) 418-1420

October 3, 2019

CERTIFICATE OF SERVICE

Pamela S. Kane certifies that she has, on this 3rd day of October, 2019, sent copies of the foregoing "ENFORCEMENT BUREAU'S MOTION FOR LEAVE TO FILE RESPONSE TO CHAPTER 7 TRUSTEE'S OCTOBER 1, 2019 PLEADING" via email to:

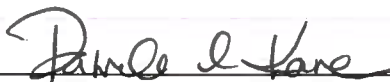
The Honorable Jane H. Halprin
Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

John B. Adams
Office of the Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Anthony Lepore, Esq.
Radiotvlaw Associates, LLC
4101 Albermarle St., NW #324
Washington, D.C. 20016-2151
anthony@radiotvlaw.net
(Co-counsel for Entertainment Media Trust)

Davina S. Sashkin, Esq.
Fletcher, Heald & Hildreth, LLC
1300 North 17th Street
11th Floor
Arlington, VA 22209
sashkin@fhhlaw.com
(Co-counsel for Entertainment Media Trust)

Howard M. Liberman
Robert G. Kirk
Wilkinson Barker Knauer, LLP
1800 M Street, NW Suite 800N
Washington, D.C. 20036
HLiberman@wbklaw.com
RKirk@wbklaw.com
(Counsel for Mark A. Kern)



Pamela S. Kane