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June 5, 1991

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Donna Searcy, Secretary
Federal Communications Commission
Washington, D.C. 20554

JUN 6 - 1991

Re: White Broadcasting Partnership, et al.
Docket No. 91-10
Jem Productions Limited Partnership
File No. BPH891214ND

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Searcy:

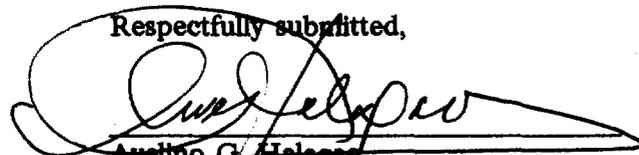
Transmitted herewith on behalf of Jem Productions Limited Partnership is an original and six copies of the following:

Petition for Leave to Amend and Amendment, and Request for Extension of Time.

These pleadings are directed to the Honorable Administrative Law Judge Edward Luton.

Please communicate with the undersigned in the event you have any questions or if you need assistance.

Respectfully submitted,



~~Avelino G. Halagao~~
AVELINO G. HALAGAO & ASSOCIATES
Counsel to JEM Productions
Limited Partnership

Enclosures

cc: As per Certificate of Service

RECEIVED

JUN 6 - 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re Applications of)	MM Docket No. 91-10
WHITE BROADCASTING PARTNERSHIP))	File No. BPH891214MM
et al.)	et seq.
)	
For Construction Permit for)	
a New FM Station on Channel)	
289A in Baldwin, Florida)	
)	
To: Honorable Edward Luton)	
Administrative Law Judge)	

PETITION FOR LEAVE TO AMEND AND AMENDMENT

JEM Productions Limited Partnership ("JEM") by its counsel, hereby petitions for leave to amend its application for a construction permit for a new FM radio station at Baldwin, Florida File No. BPH891214ND pursuant to Sections 1.65 (a) and 73.3522 (b) of the FCC Rules and Regulations. A copy of the amendment is attached hereto. In support thereof, JEM states the following:

1. JEM seeks to amend its application to furnish the Commission with updated information pertaining to changes in the mailing address and telephone number of the applicant and sole general partner, Joyce E. Morgan. Ms. Morgan also changed her place of employment from WJKS-TV Jacksonville, Florida to KXAS-TV, Fort Worth, Texas. Ms. Morgan commenced working at her new job on April 17, 1991. Ms. Morgan relocated to her new permanent residence/ mailing address on May 11, 1991.

2. Joyce E. Morgan desires to amend her original Divestiture Statement (Exhibit E-2, submitted with the application on December 12, 1989) to substitute KXAS-TV in the place of WJKS-TV.

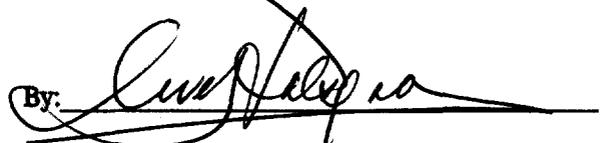
3. Ms. Morgan will relocate her permanent residence back to the Baldwin service area in the event the construction permit is awarded to JEM.

4. Pursuant to Section 1.65 of the Commission's Rules, Ms. Morgan is responsible for the continuing accuracy and completeness of information furnished in the JEM application. The acceptance of this amendment will not delay or disrupt the proceeding nor will any party be prejudiced by its acceptance. JEM will gain no comparative advantage by virtue of the amendment. Moreover, this amendment is timely because it is being submitted within 30 days of May 11, 1991, the date Ms. Morgan relocated to her new permanent mailing address.

WHEREFORE, JEM respectfully requests that the Presiding Officer grant this Petition for Leave to Amend and accept the attached Amendment.

Respectfully submitted,

JEM PRODUCTIONS LIMITED PARTNERSHIP

By: 

Avelino G. Halagao
AVELINO G. HALAGAO & ASSOCIATES
7799 Leesburg Pike, Suite 900
Falls Church, Virginia 22043
(703) 847-6803

Its Attorney

Date: June 6, 1991

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re Applications of)	MM Docket 91-10
Charley Cecil & Dianna Mae White)	File No. BPH 891214MM
d/b/a WHITE BROADCASTING)	
PARTNERSHIP)	
)	
<u>et al.</u>)	<u>et seq.</u>
)	
For Construction Permit)	
for a New FM Station on)	
Channel 289A in)	
Baldwin, Florida)	

REQUEST FOR EXTENSION OF TIME

JEM Productions Limited Partnership ("Jem") by its attorney hereby submits its request for Extension of Time in which to file an Opposition to Motion to Enlarge Issues filed by Charley Cecil, d/b/a White Broadcasting Partnership ("White") on May 24, 1991. JEM hereby requests that the Presiding Judge extend the date on which its Opposition is due by an additional ten (10) days, (until June 16, 1991) in the above-captioned proceeding. In support thereof, JEM states the following:

In its Motion to Enlarge Issues ("Motion"), White requests the addition of the following issues against JEM:

1. Whether JEM has violated Section 1.65 of the Commission's Rules in failing to timely report changes in the status of the formation of the limited partnership, and changes in the status of its limited partners from individuals to corporations, and the impact of such violation on JEM's basic qualifications to be a Commission licensee;
2. Whether JEM misrepresented the status of its own formation as a limited partnership in its application to the Commission, such as to render it a sham limited partnership, and the impact of such misrepresentation on JEM's basic qualifications to be a Commission licensee;

3. Whether JEM misrepresented the ownership interests of Mr. Peter Knobel and/or Beylen Communications in its application to the Commission, and the impact of such misrepresentation on JEM's basic qualifications to be a Commission licensee.

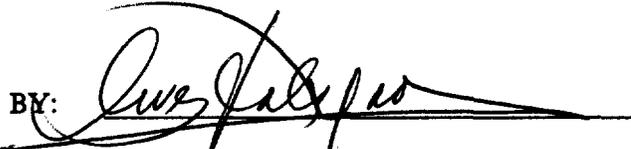
White filed its Motion against JEM on May 24, 1991. Pursuant to Sections 1.4 and 1.294 of the Commission's Rules, JEM's Opposition to White's Motion is due on June 6, 1991.

JEM's attorney has been engaged in an FCC hearing on June 3, 4, and 5, 1991 in another case. JEM's attorney has also been engaged in extensive hearing preparations prior to that hearing. Because of the conflict of the date set for the filing of JEM's Opposition and the dates set for said hearing, legal representation for the clients would be seriously undermined if JEM's attorney were required to meet JEM's June 6, 1991 filing deadline. No one will be prejudiced if JEM is allowed to file its Opposition by June 16, 1991.

WHEREFORE, having shown that good cause exists, JEM respectfully requests that the Presiding Judge grant its Request for Extension of Time and permit JEM to file its Opposition to Motion to Enlarge Issues filed by White by June 16, 1991.

Respectfully submitted,

JEM PRODUCTIONS LIMITED PARTNERSHIP

BY: 

Avelino G. Halagao
AVELINO G. HALAGAO & ASSOCIATES
7799 Leesburg Pike, Suite 900
Falls Church, Virginia 22043
(703) 847-6803

Its Attorneys

Dated: June 6, 1991

In re: JEM Productions
Limited Partnership
File No. BPH891214ND
Baldwin, Florida

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AMENDMENT

JUN 6 - 1991

JEM Productions Limited Partnership ("JEM") by its sole
Partner, Joyce E. Morgan, respectfully requests that its application
for a construction permit for a new FM Radio Station in Baldwin Florida
be amended as set forth below:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I. Address and Telephone Number Change of Sole General Partner

Section I, item 1 of FCC Form 301 is hereby amended
to show the new address and telephone number of the applicant
as follows:

New Address: 1420 Vanderbilt West #1303
Fort Worth, Texas 76120

New Telephone No.: (817)-261-4157

II. Divestiture Statement of Joyce E. Morgan

The Divestiture Statement of Joyce E. Morgan in response
to item 9, Section II of the application, FCC Form 301 (Exhibit
E2) is hereby amended as follows:

DIVESTITURE STATEMENT, AMENDED

On April 17, 1991 the sole general partner in the JEM
application, Joyce E. Morgan changed her place of employment
from WJKS-TV, Jacksonville, Florida to KXAS-TV, Fort Worth,
Texas. In the event JEM is granted a construction permit,
Ms. Joyce E. Morgan will terminate her employment at station
KXAS-TV in order that she may devote full time to the manage-
ment and operation of the proposed radio station as its
general manager.

III. Relocation of Residence

In the event the construction permit is awarded to JEM, Joyce E. Morgan will relocate her residence back to a location within the proposed service area in order that she will be able to operate and manage the proposed station on a full time basis (a minimum of 40 hours per week) as its general manager.

Respectfully submitted,

JEM Productions Limited Partnership

By: Joyce E. Morgan
Joyce E. Morgan
Its Sole General Partner

Date: 6-5-91

DECLARATION OF JOYCE E. MORGAN

I, Joyce E. Morgan, hereby declare under penalty of perjury that the foregoing is true and correct:

1. I am the sole General Partner of JEM Productions Limited Partnership.

2. The foregoing amendment was prepared for me under my supervision.

3. I have reviewed the foregoing amendment and to the best of my knowledge, belief and information, the facts stated therein are true and correct.

Joyce E. Morgan
Joyce E. Morgan

Executed on

June 5, 1991

CERTIFICATE OF SERVICE

I, Avelino G. Halagao, counsel for JEM Productions, Limited Partnership hereby certify that on the 6th day of June, 1991, true copies of the foregoing "PETITION FOR LEAVE TO AMEND AND AMENDMENT AND REQUEST FOR EXTENSION OF TIME TO FILE OPPOSITION" was mailed by U.S. First Class, postage prepaid, to the following:

Honorable Edward Luton*
Administrative Law Judge
Federal Communications Commission
2000 L Street, N.W.
Washington, D.C. 20554

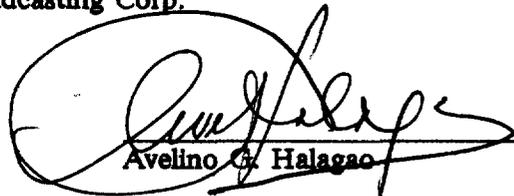
Paulette Laden, Esq.*
Hearing Branch
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Mc Cabe & Allen
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Manassas Park, Va. 22111
Counsel for White Broadcasting Partnership

James L. Winston, Esq.
Rubin, Winston, Diercks & Harris
1730 M Street, N.W., Suite 412
Washington, D.C. 20036
Counsel for Northeast Florida Broadcasting Corp.


Avelino G. Halagao

* Hand-Delivered