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August 12, 1991

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

Re: MM Docket 91-10  
JEM Productions Limited Partnership  
Baldwin, Florida

ORIGINAL  
FILE

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AUG 12 1991

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

*91-10*

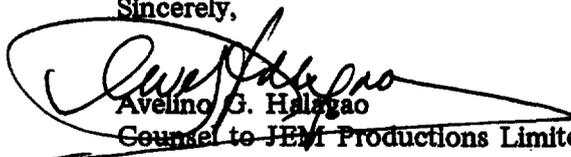
Dear Ms. Searcy:

Transmitted herewith on behalf of JEM Productions Limited Partnership is an original and six copies of a Compliance With Memorandum Opinion and Order.

This Pleading is being directed to Administrative Law Judge Edward Luton.

Please contact the undersigned if any questions should arise regarding this matter.

Sincerely,

  
Avelino G. Halagao  
Counsel to JEM Productions Limited Partnership

Enclosures:

cc: As per Certificate of Service

RECEIVED

AUG 12 1991

Before the  
FEDERAL COMMUNICATIONS COMMISSION FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554 OFFICE OF THE SECRETARY

In re Application of )

WHITE BROADCASTING PARTNERSHIP )

et al. )

For Construction Permit for )  
a New FM Station on Channel )  
289A in Baldwin, Florida )

To: Honorable Edward Luton )  
Administrative Law Judge )

MM Docket No. 91-10

File No. BPH891214MM

et seq.

COMPLIANCE WITH MEMORANDUM OPINION AND ORDER

JEM Productions Limited Partnership ("JEM") by its counsel, in compliance with Administrative Law Judge Edward Luton's Memorandum Opinion and Order (FCC 91M-2386) released August 5, 1991, respectfully states the following pertaining to the time and circumstances surrounding JEM's discovery of the non-filing of its certificate of limited partnership:

1. Joyce Morgan, the sole general partner of JEM instructed Peter Knobel, her limited partner, to file the certificate of limited partnership in Dover, Delaware after the principals signed the limited partnership agreement dated November 4, 1989 (See Exhibit I of JEM's Petition for Leave to Amend and Amendment dated May 9, 1991).

2. On February 26, 1991, the general partner and the limited partners agreed to amend the original limited partnership agreement and executed the same.

3. On April 2, 1991, Joyce Morgan signed a certificate of limited partnership for the amended partnership agreement (See Exhibit IV of JEM's Petition for Leave to Amend dated May 9, 1991).

4. On April 25, 1991, Joyce Morgan learned by way of a facsimile transmission from Peter Knobel that the certificate of the amended limited partnership was filed on April 9, 1991 with the Secretary of State in Dover, Delaware.

5. After April 25, 1991, Joyce Morgan in a routine conversation with Peter Knobel regarding the status of the application and the partnership was shocked to discover for the first time that Peter Knobel failed to file the certificate of the original limited partnership in Dover, Delaware. Ms. Morgan's query of Mr. Knobel as to whether the certificate of the original limited partnership was filed was precipitated by the fact that Ms. Morgan obtained a copy of the certificate of the amended limited partnership. Ms. Morgan is positive that this conversation with Mr. Knobel occurred after April 25, 1991 but can not recall exactly the specific date of said conversation.

6. In compliance with Section 1.65 of the Commission's Rules, JEM filed its Petition for Leave to Amend and Amendment on May 9, 1991 after the discovery of the non-filing of its certificate of limited partnership.

7. The Statement and Declaration of Joyce Morgan pertaining to this matter is attached as Exhibit A.

Respectfully submitted,

JEM PRODUCTIONS, LIMITED PARTNERSHIP

By:   
Avelino G. Halagao

AVELINO G. HALAGAO & ASSOCIATES  
7799 Leesburg Pike, Suite 900 North  
Falls Church, Virginia 22043  
Tel. No. (703) 847-6803

Its Attorneys

August 12, 1991

**STATEMENT AND DECLARATION OF JOYCE E. MORGAN**

1. My name is Joyce E. Morgan. I am the sole General Partner of JEM Productions Partnership ("JEM").

2. JEM is an applicant for a Construction Permit for a new FM Radio Station on Channel 289A in Baldwin, Florida (File No. BPH891214ND).

3. I, Joyce E. Morgan instructed my limited partner, Peter Knobel, to file the limited partnership agreement/certificate of limited partnership in Dover, Delaware during the month of November, 1989.

4. On February 26, 1991, all the principals in JEM agreed to amend the original Limited Partnership Agreement.

5. On April 2, 1991, I signed a certificate of limited partnership for the amended partnership agreement.

6. On April 25, 1991, I received a copy of the certificate of the amended limited partnership that was filed with the Secretary of State in Dover, Delaware. I received this copy via facsimile transmission from Peter Knobel.

7. Shortly after April 25, 1991, in a routine conversation with Peter Knobel, I was surprised to learn for the first time that Mr. Knobel failed to file the certificate of the original limited partnership in Dover, Delaware. I cannot recall the exact date of my conversation with Mr. Knobel. However, I am certain that it occurred after April 25, 1991.

I, Joyce E. Morgan hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, belief and information.

IN WITNESS WHEREOF, I have hereunto affixed my signature this 12th day of August, 1991 in Fort Worth, Texas.

  
JOYCE E. MORGAN  
Sole General Partner  
JEM Productions Limited Partnership

CERTIFICATE OF SERVICE

I, Avelino G. Halagao, counsel for JEM Productions, Limited Partnership hereby certify that on the 12th day of August, 1991, true copies of the foregoing "COMPLIANCE WITH MEMORANDUM OPINION AND ORDER" 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

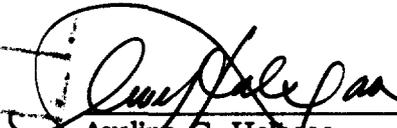
Paulette Laden, Esq.\*  
Hearing Branch  
Federal Communications Commission  
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Washington, D.C. 20036  
Counsel for Northeast Florida Broadcasting Corp.

  
Avelino G. Halagao

\* Hand-Delivered