

**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 STATUS REPORT

1. Pursuant to *Order*, FCC 19M-05, the Chief, Enforcement Bureau (Bureau), through her attorneys, hereby respectfully submits its second Status Report in the above-captioned matter.

Discovery Matters

2. The Bureau is actively engaged in the discovery process. On August 20, 2019, the Bureau served its first sets of discovery requests on Entertainment Media Trust, Dennis Watkins, Trustee (EMT).¹ Pursuant to section 1.325 of the Commission's rules, EMT's responses and objections to the Bureau's first set of requests for documents were due on August 30, 2019.² Instead of meeting this deadline, EMT filed – on the date its responses were due – a motion for an extension of time seeking “a minimum of two additional weeks to respond.”³ The Bureau will oppose EMT's last-minute request for an extension in a separate filing.

3. Pursuant to section 1.323 of the Commission's rules, EMT's responses and objections to the Bureau's First Interrogatories are due today, September 3, 2019.⁴ At the time of the Bureau's filing of this Status Report, EMT has not provided its responses and objections to the Bureau. Notably, EMT's Motion does not seek an extension to respond to the Bureau's Interrogatories – it only seeks an extension to respond to the Bureau's First Document Requests. Thus, the Bureau expects EMT to timely serve its responses and objections to the Bureau's First Interrogatories today.

4. The Bureau's counsel is currently in the process of preparing discovery requests

¹ See Enforcement Bureau's First Request for Production of Documents to Entertainment Media Trust, Dennis J. Watkins, Trustee (Aug. 20, 2019) (Bureau's First Document Requests); Enforcement Bureau's First Set of Interrogatories to Entertainment Media Trust, Dennis J. Watkins, Trustee (Aug. 20, 2019) (Bureau's First Interrogatories).

² See 47 CFR § 1.325(a)(2).

³ Motion for Extension of Time (Aug. 30, 2019 (Motion)).

⁴ See 47 CFR § 1.323(b).

for non-parties and expects to provide requests for the issuance of subpoenas to the Presiding Judge by the end of September.⁵

Other Matters

5. EMT first approached the Bureau about wanting to discuss options for resolving the above-captioned matter without proceeding to an evidentiary trial-type hearing on August 12, 2019. At that time, EMT asked the Bureau whether it would agree to stay discovery while those discussions proceeded. The Bureau refused to agree to any such stay as unwarranted and premature.

6. Discussions continued between counsel for the Bureau and EMT's counsel during the following weeks, with the most recent conversation occurring on August 28, 2019. EMT did not include counsel for Petitioner Kern in any of those discussions.

7. At the end of its August 28th discussion with the Bureau, EMT had not confirmed that it intended to proceed with any of the options it discussed with the Bureau. It appears from its Motion, that EMT scheduled an appointment for today to meet with "potential counsel regarding a possible bankruptcy filing."⁶ At the time of the Bureau's filing of this Status Report, EMT has not confirmed that it intends to file for bankruptcy or that it has done so.

⁵ See 47 CFR § 1.331(b).

⁶ Motion at 2.

Respectfully submitted,

Rosemary C. Harold
Chief, Enforcement Bureau



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September 3, 2019

CERTIFICATE OF SERVICES

Pamela S. Kane certifies that she has on this 3rd day of September, 2019, sent copies of the foregoing "ENFORCEMENT BUREAU'S STATUS REPORT" via email to:


The Honorable Jane H. Halprin
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