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

JUL 19 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In Re Applications of	)	MM Docket No. 93-75
	)	
TRINITY BROADCASTING OF FLORIDA, INC.	)	BRCT-911001LY
	)	
For Renewal of License for Television Station WHFT(TV) Miami, Florida	)	
	)	
GLENDALE BROADCASTING COMPANY	)	BPCT-911227KE
	)	
For Construction Permit Miami, Florida	)	

To: Hon. Joseph Chachkin  
Administrative Law Judge

JOINT MOTION FOR EXTENSION OF TIME

The undersigned parties, constituting all of the private parties in this proceeding (hereinafter "the Movants"), with the consent of the Mass Media Bureau, respectfully request that the time for filing proposed findings of fact and conclusions of law be extended by ten days and the time for filing replies be extended by seven days. In support of this motion, the Movants respectfully state as follows:

1. Proposed findings of fact and conclusions of law in this proceeding are currently due on August 5, 1994. Based on the concerted efforts that have been made and extenuating

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circumstances as set forth below, the Movants believe that the extension requested herein is necessary in order to submit proper findings regarding the many issues and extensive record in this proceeding. The Movants have endeavored to request the shortest extension they believe necessary. Although the requested extension for proposed findings is ten total days, it actually constitutes only six business days, with four of the intervening days being weekends. Those weekends are vital time since, without the interference of telephone and other distractions, they represent the most productive time for counsel to coordinate factual and legal references and to take the other steps necessary to complete proposed findings. The applicants in the proceeding already have been working extensively on weekends and late evenings to try to complete their findings by the current due date, but have now realized that the modest extension that is being requested is needed. By virtue of the Movants' request for a shorter extension concerning reply findings, the maximum overall delay in having all pleadings on file that would result from this motion is one week.

2. Movant Spanish American League Against Discrimination ("SALAD") has extenuating circumstances that support its request for this extension. As the Presiding Judge is aware, SALAD was represented throughout the proceeding by attorney David McCurdy. However, Mr. McCurdy has now left the law practice of SALAD's counsel for another position, and SALAD's undersigned counsel

must familiarize himself with the entire record in order to submit proposed findings. Since the close of the record herein, SALAD's counsel has had extensive responsibilities litigating the renewal hearing in the Lutheran Church/Missouri Synod proceeding, Docket No. 94-10; has been actively involved in matters concerning the Commission's inquiries regarding alien ownership of the Fox Network; has two impending briefs due in the United States Court of Appeals; and has significant responsibilities resulting from the recent Court decision in United States Telephone Association v. FCC, Case No. 92-1321 (D.C. Cir. July 12, 1994), which overturns the Commission's forfeiture policy and has potentially great impact regarding the Commission's equal employment opportunity enforcement, concerning which SALAD's counsel is deeply involved. The Movants respectfully submit that these circumstances constitute good cause for the limited extension that is requested herein.

3. As indicated above, the other Movants have been working extensively through weekends and into late evenings in order to complete their proposed findings. However, because of the number of issues, the many volumes of transcripts, and the numerous exhibits, the assimilation of the record and the coordination of complete and accurate citations has proven to be extremely time consuming. The issues in this proceeding have great importance, affecting not only the outcome of this case, but also potentially bearing on other renewal proceedings that involve the same parties. Based on the extensive efforts they

have made to date and the importance of the issues involved, the Movants believe that the requested extension of time is vital in order for them to provide the Presiding Judge with a proper presentation of the facts and law which they respectively consider applicable to the resolution of this case.

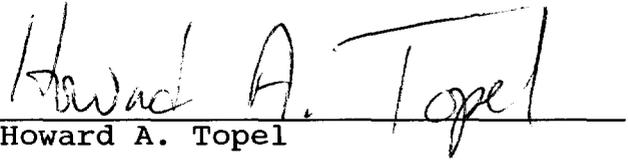
4. As previously indicated, the Mass Media Bureau has indicated that it has no objection to the grant of this motion.

For the foregoing reasons, the Movants respectfully request that the time for filing findings of fact and conclusions of law in this proceeding be extended by ten days, to August 15, 1994, and that the time for filing reply findings be extended by one week, to September 16, 1994.

Respectfully submitted,

TRINITY BROADCASTING OF FLORIDA, INC.;  
TRINITY CHRISTIAN CENTER OF SANTA ANA,  
INC., d/b/a TRINITY BROADCASTING  
NETWORK,  
NATIONAL MINORITY TV, INC.

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July 19, 1994

CERTIFICATE OF SERVICE

I, Joan M. Trepal, a secretary in the law firm of Mullin, Rhyne, Emmons and Topel, hereby certify that on this 19th day of July, 1994, copies of the foregoing "Joint Motion for Extension of Time" were sent by first class mail, postage prepaid, to the following:

- \* The Honorable Joseph Chachkin  
Administrative Law Judge  
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Joan M. Trepal

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\* Hand Delivered.