

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	MB Docket No. 14-82
)	
PATRICK SULLIVAN)	FRN 0003749041, 0006119796,
(Assignor))	0006149843, 0017196064
)	
and)	Facility ID No. 146162
)	
LAKE BROADCASTING, INC.)	File No. BALFT-20120523ABY
(Assignee))	
)	
Application for Consent to Assignment of)	
License of FM Translator Station W238CE,)	
Montgomery, Alabama)	

To: Lake Broadcasting, Inc.

**ENFORCEMENT BUREAU'S
SECOND REQUEST FOR THE PRODUCTION OF DOCUMENTS TO
LAKE BROADCASTING, INC.**

1. The Chief, Enforcement Bureau ("Bureau"), by his attorneys, pursuant to Section 1.325 of the Commission's rules, 47 C.F.R. § 1.325, hereby requests that Lake Broadcasting, Inc. ("Lake Broadcasting") produce the Documents, as defined and specified herein, and deliver the Documents to the offices of the Investigations & Hearings Division, Enforcement Bureau, Suite 4-C330, 445 12th Street, S.W., Washington, DC 20554 (or at some other location that is mutually acceptable to the Bureau and Lake Broadcasting) in the form specified within ten (10) days of the date of this Document Request, or within such other timeframe to which the Bureau and Lake Broadcasting may agree.

Definitions

- a. As used herein, the term "Lake Broadcasting" means Lake Broadcasting, Inc., including all persons acting or purporting to act on their behalf, including all directors, officers, employees, managers, shareholders, general partners, limited partners, parents, subsidiaries, whether wholly or partially owned, affiliates, divisions, predecessors and successors-in-interest or other affiliated company or business, or agents, including consultants and any other persons working for or on behalf of any of the foregoing.
- b. "Act" shall mean the Communications Act of 1934, as amended.
- c. "Commission" or "FCC" shall mean the Federal Communications Commission.
- d. The terms/phrases "referring to," "relating to" and/or "concerning," as used herein, shall be interpreted broadly and shall include, but not be limited to, the following meanings: constituting, comprising, evidencing, reflecting, respecting, discussing, referring to, stating, describing, recording, noting, considering, embodying, evaluating, analyzing, mentioning, containing, concerning, regarding, indicating, pertaining to, showing, bearing upon, studying, memorializing, or commenting upon, or any other term synonymous with or similar to the foregoing.
- e. The term "and" also means "or" and the term "or" also means "and."
- f. The term "Document" shall have the same meaning as the term "document" in Rule 34(a) of the Federal Rules of Civil Procedure, and shall include all such items which would be subject to inspection and copying under that Rule, including, but not limited to, all materials written, printed, typed, photographed or recorded such as writings, notes, correspondence, memoranda, agreements, contracts, drafts, mark-ups, red-lined materials, proposals, offers, minutes of meetings, agendas, reports, calendar or diary entries,

drawings, graphs, charts, logs, photographs, phone records, tape recordings, computer disks, computer printouts or tape. e-mail, or any other data compilations from which information can be obtained or translated. Documents which are subject to production include, but are not limited to, all documents within the possession, custody or control of Lake Broadcasting or its agents and attorneys and shall be produced as such documents are kept in the usual course of business by Lake Broadcasting.

g. "Duncan- Hively" means Duncan-Hively Psychological Services, the firm operated by Ann Dell Duncan-Hively. J.D., Ph. D. and Wells Hively, Ph.D., that prepared the "DH Report" defined below.

h. "DH Report" means the November 22, 2014 psychological report regarding Michael Rice submitted by Lake Broadcasting on December 8, 2014, in this proceeding.

i. "Michael Rice" means Michael S. Rice, principal of Lake Broadcasting.

Instructions

a. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.

b. Each Document produced shall be identified by the number of the Document request to which it is responsive, and each Document shall be produced in its entirety, even if only a portion of that Document is responsive to a request herein. This means that the Document shall not be edited, cut, or expunged, and shall include all appendices, tables, or other attachments, and all other Documents referred to in the Document or attachments. All written materials necessary to understand any Document responsive to these inquiries must also be produced.

c. If a Document responsive to any request herein existed but is no longer or not currently available, or Lake Broadcasting is unable for any reason to produce a Document responsive to any request, each such Document shall be identified by author, recipient, date, title, and specific subject matter, and a full explanation shall be provided why the Document is no longer available or why Lake Broadcasting is otherwise unable to produce it.

d. If any Document produced in response to any request herein is not dated, the date on which the Document was prepared shall be provided. If any Document does not identify its author(s) or recipient(s), the name(s) of the author(s) or recipient(s) of the Document shall be provided.

e. This request is continuing in nature, requiring immediate production if a further or different Document responsive to any request herein comes into the possession, custody, or control of Lake Broadcasting during the pendency of this proceeding.

f. If production of any Document responsive to any request herein called for by this request is refused pursuant to a claim of privilege, the Document shall be identified by reference to its author, recipient(s) (including any person receiving a copy, regardless of whether that recipient is listed on the Document), date, and subject matter. The basis for the privilege claimed for such Document shall be specified with sufficient precision to permit assessment of the applicability of the privilege involved.

g. Unless otherwise specified, all information requested is for the period from September 30, 1994, to the present.

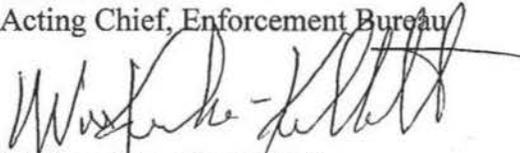
DOCUMENTS REQUESTED

1. All Documents referenced in the DH Report.

2. All Documents, including but not limited to test results and examination reports, upon which Duncan-Hively relied in preparing its DH Report.
3. All examination reports and test results and notes relating thereto from the 1991 examination referenced in the DH Report.
4. All examination reports and test results and notes relating thereto from the 2014 examination referenced in the DH Report.
5. All examination reports and test results and notes relating thereto from any examination or test conducted on Mr. Rice subsequent to the preparation of the DH Report.
6. Federal income tax returns filed by or on behalf of Michael Rice in 2014, 2013, 2012, 2011, and 2010.

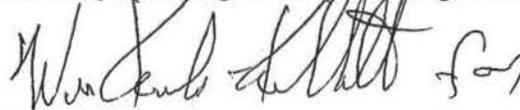
Respectfully submitted,
Travis LeBlanc

Acting Chief, Enforcement Bureau



William Knowles-Kellett

Attorney, Investigations & Hearings Division



Gary Oshinsky

Attorney, Investigations & Hearings Division

Federal Communications Commission
Enforcement Bureau
Investigations & Hearings Division
445 12th Street, S.W., Room 4-C330
Washington, D.C. 20554
(202) 418-1420

March 4, 2015

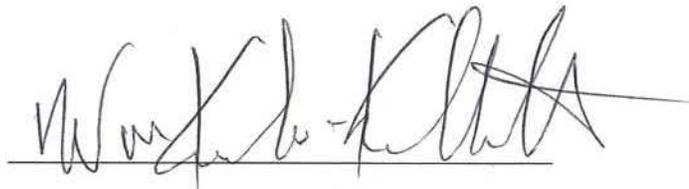
CERTIFICATE OF SERVICE

I, William Knowles-Kellett, an attorney in the Enforcement Bureau's Investigations & Hearings Division, certify that on this 4th day of March 2015, I sent via First Class United States Mail and via email copies of the foregoing ENFORCEMENT BUREAU'S SECOND REQUEST FOR THE PRODUCTION OF DOCUMENTS TO LAKE BROADCASTING, INC. to:

Jerold L. Jacobs, Esq.
Law Offices of Jerold L. Jacobs
1629 K Street, N.W., Suite 300
Washington, DC 20006
jerold.jacobs.esq@verizon.net
Counsel for Patrick Sullivan and Lake Broadcasting, Inc.

A copy of the foregoing also was served via hand-delivery to:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W., Room 1-C861
Washington, DC 20554

A handwritten signature in black ink, appearing to read "William Knowles-Kellett", is written over a horizontal line. The signature is stylized and cursive.