

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

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

To: Richard L. Sippel  
Chief Administrative Law Judge

**JOINT PROPOSED DISCOVERY SCHEDULE**

1. On June 11, 2015, the Presiding Judge issued *Order*, FCC 15M-22, instructing the Enforcement Bureau (Bureau) and Lake Broadcasting, Inc. (Lake) to jointly propose a Discovery Schedule no later than noon on June 24, 2015, “which shall include specific dates for production of documents, dates and places for the taking of depositions and a date for completion of all discovery.”<sup>1</sup> Counsel for the Bureau and Lake have conferred and jointly propose the following schedule in accordance with the Presiding Judge’s instructions. Lake has authorized the Enforcement Bureau to file this pleading on its behalf.

---

<sup>1</sup> *Order*, FCC 15M-22 (ALJ, rel. June 11, 2015) at 6.

2. Proposed Procedural Schedule

<b>June 26, 2015</b>	Deadline for production of documents responsive to Request 6 of the Bureau's Motion to Compel; <sup>2</sup> Mr. Rice's federal tax returns. (Lake's counsel reports that Lake has already mailed the psychological test results to the Bureau's expert).
<b>July 1 – 15, 2015</b>	Possible Interview of Mr. Rice by the Bureau's medical expert Dr. Weitzl. <sup>3</sup>
<b>August 1-15, 2015</b>	Deadline for production of Dr. Weitzl's expert report regarding Mr. Rice to Lake.
<b>August 17-21, 2015</b>	Dates for proposed depositions for, among others: Mr. Michael Stephen Rice; Dr. Ann Dell Duncan-Hively (designated medical expert for Lake); Dr. Kimberly Weitzl (designated medical expert for the Bureau); Ms. Carter Law (designated legal expert for Lake) in St. Louis, Missouri.
<b>October 20, 2015</b>	Deadline for completing depositions and document production; discovery ends.

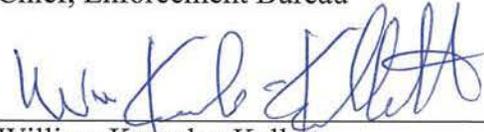
---

<sup>2</sup> See Enforcement Bureau's Motion To Compel Production Of Documents, filed March 23, 2015.

<sup>3</sup> Dr. Weitzl has indicated that in similar cases she has found it useful to interview the subjects of her recidivism risk assessment. Until Dr. Weitzl has had the opportunity to review Drs. Duncan-Hively's test results, it is unclear whether such an interview of Mr. Rice will be helpful in the instant case. The Parties have not yet reached an agreement regarding the scope and parameters of any such interview of Mr. Rice. If Dr. Weitzl concludes that such an interview may be helpful in forming her opinion, the Bureau will likely seek the Presiding Judge's guidance to clarify the scope of such an examination.

Respectfully submitted,

Travis LeBlanc  
Chief, Enforcement Bureau



---

William Knowles-Kellett  
Attorney  
Investigations and Hearings Division  
Enforcement Bureau  
Federal Communications Commission  
445 12th Street SW, Room 4-C330  
Washington, D.C. 20554  
(202) 418-1420

Gary Oshinsky  
Attorney  
Investigations and Hearings Division  
Enforcement Bureau  
Federal Communications Commission  
445 12th Street SW, Room 4-C330  
Washington, D.C. 20554  
(202) 418-1420

June 24, 2015

**CERTIFICATE OF SERVICE**

William Knowles-Kellett, an attorney in the Enforcement Bureau's Investigations & Hearings Division, certifies that he has on this 24th day of June 2015, sent by first class United States mail and by email copies of the foregoing JOINT PROPOSED DISCOVERY SCHEDULE 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](mailto: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 12<sup>th</sup> Street, S.W., Room 1-C861  
Washington, DC 20554



William Knowles-Kellett

**CERTIFICATE OF SERVICE**