

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

In the Matter of)
)
MARITIME COMMUNICATIONS/LAND)
MOBILE, LLC)
)
Participant in Auction No. 61 and Licensee of)
Various Authorizations in the Wireless Radio)
Services)
)
Applicant with **ENCANA OIL AND GAS (USA),**)
INC.; DUQUESNE LIGHT COMPANY; DCP)
MIDSTREAM, LP; JACKSON COUNTY)
RURAL MEMBERSHIP ELECTRIC)
COOPERATIVE; PUGET SOUND ENERGY,)
INC.; ENBRIDGE ENERGY COMPANY, INC.;)
INTERSTATE POWER AND LIGHT)
COMPANY; WISCONSIN POWER AND)
LIGHT COMPANY; DIXIE ELECTRIC)
MEMBERSHIP CORPORATION, INC.;)
ATLAS PIPELINE – MID CONTINENT, LLC)
DENTON COUNTY ELECTRIC)
COOPERATIVE, INC., DBA COSERV)
ELECTRIC; AND SOUTHERN CALIFORNIA)
REGIONAL RAIL AUTHORITY)
)
For Commission Consent to the Assignment of)
Various Authorizations in the Wireless Radio)
Services)

EB Docket No. 11-71
File No. EB-09-IH-1751
FRN: 0013587779

Application File Nos. 0004030479,
0004144435, 0004193028,
0004193328, 0004354053,
0004309872, 0004310060,
0004314903, 0004315013,
0004430505, 0004417199,
0004419431, 0004422320,
0004422329, 0004507921,
0004153701, 0004526264,
0004636537, and 0004604962

FILED/ACCEPTED

AUG 10 2011

Federal Communications Commission
Office of the Secretary

To: Marlene H. Dortch, Secretary
Attention: Chief Administrative Law Judge Richard L. Sippel

OPPOSITION TO MARITIME’S MOTION TO DEFER ALL PROCEDURAL DATES

Warren C. Havens, Environmental, LLC, Intelligent Transportation and Monitoring
Wireless, LLC, Skybridge Spectrum Foundation, Telesaurus Holdings GB, LLC, Verde Systems,
LLC, and V2G LLC (collectively, “SkyTel”), by their attorneys, hereby oppose the Motion to
Defer all Procedural Dates submitted by Maritime Communications/Land Mobile, LLC
 (“Maritime”) on August 1, 2011 in the above-captioned proceeding (the “Maritime Motion”).

No. of Copies rec'd 0+5
LIST A B C D E

The Maritime Motion asks the Presiding Judge to defer all procedural dates in this proceeding pursuant to the Commission's *Second Thursday* policy. For the reasons discussed below, the Presiding Judge should promptly deny the Maritime Motion and direct Maritime to respond immediately to outstanding discovery requests submitted by the Enforcement Bureau in this matter.

As a threshold matter, there are serious credibility issues with the Maritime Motion. Thus far in this proceeding, Maritime has demonstrated a marked aversion to participating in the discovery process in anything remotely approaching a cooperative fashion. First, Maritime sought and received two extensions of time to respond to the Enforcement Bureau's Requests for Admissions.¹ Once it found time to respond, Maritime's answers were so incomplete and evasive that the Enforcement Bureau was forced to file a Motion to Compel citing "Maritime's intentionally deficient responses and dilatory tactics [which] smack of gamesmanship."² Maritime subsequently requested an extension of time to respond to the Bureau's first sets of interrogatories and document requests, citing travel schedules of Maritime's principal, Maritime personnel, and Maritime's counsel.³ Maritime filed this request for more than a three-week extension a full nine days after the Bureau served its first discovery requests, just days before the responses were due.

The travel schedule challenges Maritime describes appear to be wholly foreseeable. Yet Maritime elected not to raise the issue either at the pre-hearing conference or following the

¹ See *Maritime Communications/Land Mobile, LLC, Order*, EB Docket No. 11-71, FCC 11M-14 (ALJ rel. June 14, 2011); *Maritime Communications/Land Mobile, LLC, Order*, EB Docket No. 11-71, FCC 11M-16 (ALJ rel. June 27, 2011).

² Enforcement Bureau's Motion to Compel Maritime to Properly Respond to Requests for Admission of Facts and Genuineness of Documents, EB Docket No. 11-71, 2 (July 7, 2011).

³ Maritime's Motion for Extension of Time to Respond to the Enforcement Bureau's Initial Discovery Requests, EB Docket No. 11-71 (July 15, 2011).

release of the Presiding Judge's Order setting the commencement of discovery for July 5, 2011.⁴ Now, despite the travel schedules of Maritime's principal and counsel, which allegedly would prevent Maritime from responding to the Bureau's discovery requests until August 12, 2011, Maritime has managed to find the time to file a voluntary petition for bankruptcy and, on the same day, the Maritime Motion. All of this from a licensee that appears to have exhibited a profound lack of candor before the Commission in matters directly related to the subject of this proceeding.⁵

In this context, it is hardly unreasonable to wonder whether Maritime's voluntary bankruptcy filing and the Maritime Motion are stunts designed only to stall Maritime's discovery obligations in the hope the Commission might grant the request of the proposed assignees to be removed from this proceeding. Maritime has only compounded this concern by its submissions in other matters, where it has made no mention of its bankruptcy petition. For example, on August 8, 2011, days after the submission of the Maritime Motion, Maritime submitted an Opposition to SkyTel's petition to deny Maritime's application to renew all of its AMTS site-

⁴ Maritime Communications/Land Mobile, LLC, *Order*, EB Docket No. 11-71, FCC 11M-15 (ALJ rel. June 16, 2011).

⁵ *See, e.g.*, Maritime Communications/Land Mobile, LLC, *Order to Show Cause, Hearing Designation Order, and Notice of Opportunity for Hearing*, EB Docket No. 11-71, FCC 11-64 (April 19, 2011) at ¶ 5 ("The timing and substance of these disclosures raise material questions of fact about whether Maritime and its principals engaged in a pattern of deception and misinformation..."); ¶ 6 ("There are also substantial and material questions of fact about whether Maritime made repeated and affirmative misrepresentations and provided false certifications..."); ¶ 7 ("The Commission relied to its detriment on Maritime's initial and purportedly 'corrective' filings..."); ¶ 18 ("In addition, WTB noted for the record the contradictory representations...and that Maritime had 'offered no explanation for the inconsistent statements... WTB concluded that it remained concerned by Maritime's failure to provide accurate information on the first attempt") ¶ 19 ("Inconsistencies between Maritime's representations, and those contained in the filings by MariTEL raise further questions about Maritime's truthfulness"); ¶ 38 ("...Maritime repeatedly provided incomplete and potentially misleading information..."); ¶ 43 ("The record before us indicates that not only did Maritime fail to make the required disclosures, it appears to have engaged in a continued practice of obfuscation and misdirection...").

based stations along the Atlantic Coast under Call Sign WRV374.⁶ Nowhere in its 30 page, 49 exhibit filing did Maritime mention its purported bankruptcy.

Setting aside the serious question of credibility, Maritime has not come close to making a showing that might warrant relief under the Commission's *Second Thursday* doctrine, and the Maritime Motion is thus highly premature. By way of background, the Commission's general policy is that applications for consent to a proposed assignment or transfer of control of a license cannot be granted while there is a pending inquiry into the qualifications of the licensee to hold the license.⁷ The Commission's *Second Thursday* doctrine represents a narrow exception to that general policy, under which the Commission may consider the "public interest in protecting innocent creditors" and "approve the sale and assignment of the bankrupt's license when the transaction will not unduly interfere with the FCC mandate to insure that broadcast licenses are used and transferred consistently with the Communications Act."⁸ The Commission, then, if it elects to apply *Second Thursday*, will:

first analyze whether any individuals charged with misconduct continue to hold operational positions within the company or will otherwise benefit from the proposed transaction. Next, we identify the equitable benefits attendant to the proposed transaction resulting from the bankruptcy proceeding. Finally, we weigh the public interest harms associated with allowing wrongdoers to benefit under the transaction against the public interest benefits of allowing reorganization under the bankruptcy laws.⁹

Thus, an initial step in a *Second Thursday* showing in this matter would be a demonstration that none of the principals of Maritime will benefit from the proposed transaction.

⁶ File Number 0004738157.

⁷ See *Jefferson Radio Co. v. FCC*, 340 F.2d 781, 783 (D.C. Cir. 1974).

⁸ *LaRose v. FCC*, 494 F.2d 1145, 1148 (D.C. Cir. 1974).

⁹ WorldCom, Inc. and its Subsidiaries (debtors-in-possession), *Memorandum Opinion and Order*, 18 FCC Rcd 26484, ¶ 15 (2003).

Maritime has provided no detail whatsoever, either in the Maritime Motion or in the form it submitted initiating its bankruptcy proceeding, to allow any such determination.¹⁰

In fact, Maritime's bankruptcy petition is so facially deficient that, in less than a week, it generated three separate orders from the court instructing Maritime that, should Maritime fail to cure specific deficiencies and provide additional required information by August 17, 2011, its bankruptcy petition is subject to dismissal.¹¹ One of those orders expressly states: "This case is subject to dismissal within 14 days for failure to file documents that should have been filed with the petition."¹² Another states: "If the Corporate Ownership Statement requested hereby is not received or filed within 14 days from the date of this Notice, a Show Cause hearing will be scheduled at which the corporation will be required to appear through counsel and show cause why sanctions should not be imposed, or the case dismissed, for failure to submit the required Corporate Ownership Statement."¹³

The information included in Maritime's bankruptcy petition is such weak tea that the petition is subject to dismissal and Maritime is potentially subject to sanctions for failure to submit required information. This only serves to underscore the concern that Maritime's bankruptcy petition and the Maritime Motion are nothing more than stunt advocacy. Before it could even hope to take advantage of *Second Thursday*, Maritime would have to provide substantial and detailed information concerning the identity of its ownership, its creditors, its outstanding debts, and its assets. Prior to Maritime making that showing, Maritime's Motion is

¹⁰ Maritime's bankruptcy submission consisted only of a form, with no supporting documentation provided whatsoever. *See* Attachment A.

¹¹ *See* Attachments B, C and D.

¹² Attachment B.

¹³ Attachment D.

premature and its bald assertions that it will qualify for relief under *Second Thursday* are speculative.

In addition, the *Second Thursday* policy reflects the Commission's ability to weigh competing policy interests: the public interest in the Commission's enforcement of its rules and the public interest in protecting innocent creditors in a bankruptcy proceeding. That is, *Second Thursday* is not a get-out-of-jail free card for any licensee that elects to petition, voluntarily, for bankruptcy during an investigation into the licensee's qualifications to remain a license-holder. Rather, the policy encourages the weighing of the public interest and the particular facts of a given case.

The Commission has, in the past, noted that, "while the Commission generally tries to accommodate the concerns that underlie the bankruptcy laws, the bankruptcy policy of protecting innocent creditors is not applicable in situations where, as in the instant case, the Commission determines that other public interest considerations outweigh this policy."¹⁴ Indeed, in a case involving ongoing misrepresentation to the Commission, the Commission stated that, "in this case the severity of the misconduct alleged by Shurberg against Astroline is such that our interest in ensuring the integrity of our processes and our minority ownership policies far outweighs our duty to minimize conflict with policies arising from the bankruptcy statutes."¹⁵ The Commission went on to state: "While we are sympathetic to the interests of innocent creditors, we believe, on balance, that the preservation of the integrity of our decision making processes and minority ownership policies compels the action we take today."¹⁶ Similar

¹⁴ Martin W. Hoffman, Trustee-in-Bankruptcy for Astroline Communications Company Limited Partnership, *Memorandum Opinion and Order and Hearing Designation Order*, 12 FCC Rcd 5224, 5229, n. 9 (1997).

¹⁵ *Id.* at ¶ 11.

¹⁶ *Id.*

considerations, including ongoing misrepresentations to the Commission, the integrity of the Commission's designated entity rules and the integrity of the administrative process, are at issue in this hearing proceeding. Given the severity of the misconduct alleged in this case, the Commission would be well within its discretion to conclude that *Second Thursday* should not apply and the hearing proceeding can and should proceed.

Further, from a public interest standpoint, it is highly questionable whether the Commission should apply *Second Thursday* to these facts. This is not a case where a licensee engaged in some misconduct only during the period where it held a license. Here, a licensee is accused of material misrepresentations made to secure an unlawful bidding credit in a spectrum auction that deprived the U.S. Treasury of additional payments and prejudiced lawful competing bidders. Maritime essentially stands accused of lying to secure its licenses in the first instance. To allow Maritime to pass along illegally-obtained licenses to another party to protect "innocent creditors" would seriously offend the integrity of the Commission's spectrum auction processes.

This is particularly the case where the public interest in protecting "innocent creditors" is unclear. As an initial matter, Maritime has not even identified its creditors. In fact, one of the underlying questions that must be resolved in this proceeding is who, exactly, controls and/or is affiliated with Maritime. In invoking *Second Thursday*, Maritime seeks to assume away a substantial and material issue in this proceeding. In the event some of Maritime's creditors hold any sort of equity interest in Maritime, that could not only demonstrate that Maritime has flaunted the Commission's requirements that it disclose its affiliates when seeking a designated entity bidding credit in an auction. In addition, it would call into question the "innocence" of the creditors. Indeed, a "voluntary decision to convert to an equity owner...would deprive [a party] of the right to now claim 'innocent creditor' status under *Second Thursday*."¹⁷

¹⁷ George E. Cameron Jr. Communications, *Memorandum Opinion and Order*, 93 FCC 2d 789, ¶ 35 (1983).

Even if Maritime were to come forward with a proper *Second Thursday* showing that might allow the Commission at least to consider whether it would be proper to allow an exception to the general *Jefferson Radio* principle, there are still compelling reasons for allowing the hearing proceeding to go forward. Critically, the Hearing Designation Order that initiated this proceeding directs the Presiding Judge to consider issues that would survive a proper *Second Thursday* showing by Maritime. These include questions as to whether Maritime should be subject to a forfeiture and whether Maritime and its principals should be prohibited from participating in future Commission spectrum auctions.¹⁸ Neither of these questions is implicated by the Commission's *Second Thursday* doctrine, and SkyTel respectfully submits that the Presiding Judge is still obligated by the Hearing Designation Order to proceed with a hearing to determine the outcome of these issues even *if* Maritime is ultimately able to submit a compelling *Second Thursday* showing. Thus, even if the Commission ultimately were to conclude that it should apply *Second Thursday* in this instance, which, as discussed above, is wholly speculative at this juncture, this hearing proceeding, and the participation of Maritime as well as its principals, would still be necessary to comply with the Hearing Designation Order. Even if Maritime itself actually intends to pursue a legitimate bankruptcy, that has no effect on the investigation into the conduct of, and possible sanctions against, Maritime's principals.

Additionally, SkyTel notes that *Second Thursday*, by itself, would not allow the grant of the above-captioned assignment of license applications. All of those applications are subject to

¹⁸ See Maritime Communications/Land Mobile, LLC, *Order to Show Cause, Hearing Designation Order, and Notice of Opportunity for Hearing*, EB Docket No. 11-71, FCC 11-64, ¶ 64 (April 19, 2011) (“It is further ordered that, irrespective of the resolution of the foregoing issues, it shall be determined whether an order should be issued against Maritime prohibiting it and its principal(s) from participating in future Commission actions”); ¶ 65 (“It is further ordered that, irrespective of the resolution of the foregoing issues, it shall be determined, pursuant to section 503(b)(1) of the Act, 47 U.S.C. § 503(b)(1), whether an Order of Forfeiture should be issued against Maritime in an amount not to exceed the statutory limit for the willful and/or repeated violation of each rule section above for which the statute of limitations in section 503(b)(6), 47 U.S.C. § 503(b)(6), has not lapsed.”)

SkyTel's timely-filed petitions to deny, and the Commission would have to resolve the issues raised in those petitions to deny before it could consider granting the applications. Further, as SkyTel has previously noted, SkyTel has pending an application for review of the denial of SkyTel's petition for reconsideration of the denial of its petition to deny Maritime Communications/Land Mobile, LLC's long-form application for grant of licenses in Auction No. 61. That application for review raises the question whether Maritime's applications for license should have been granted in the first place, and a proper resolution of that application for review would conclude that those applications should not have been granted. Again, until the Commission resolves that application for review, it should not consider granting the assignment applications under *Second Thursday* or any other policy. Similarly, SkyTel has previously indicated its intention in the present proceeding to argue that Maritime's licenses were void *ab initio* because of the fatal flaws in Maritime's license applications.

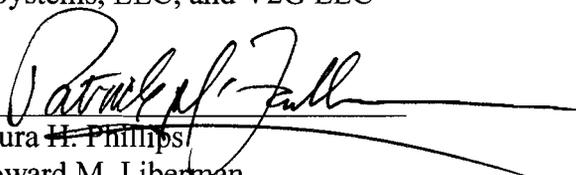
When Maritime is prepared to present a serious showing, including detailed information in its bankruptcy proceeding as well as detailed information to the Commission, it will have the opportunity to make its *Second Thursday* arguments. Until that time, this hearing proceeding can and should continue.

For the foregoing reasons, SkyTel respectfully requests that the Presiding Judge deny the Maritime Motion in its entirety. In the event Maritime is allowed to amend or supplement its motion upon cure of the fatal flaws in its bankruptcy petition, SkyTel requests that it be allowed to respond.

Respectfully Submitted,

Warren C. Havens, Environmental, LLC,
Intelligent Transportation and Monitoring
Wireless, LLC, Skybridge Spectrum
Foundation, Telesaurus Holdings GB, LLC,
Verde Systems, LLC, and V2G LLC

By:



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Their Attorneys

August 10, 2011

CERTIFICATE OF SERVICE

I, Patrick R. McFadden, hereby certify that on this 10th day of August, 2011, a true copy of this Opposition was served via first class, postage paid United States Mail upon the following:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
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Patrick R. McFadden

ATTACHMENT A

B1 (Official Form 1)(4/10)

United States Bankruptcy Court Northern District of Mississippi		Voluntary Petition
Name of Debtor (if individual, enter Last, First, Middle): Maritime Communications/Land Mobile, LLC		Name of Joint Debtor (Spouse) (Last, First, Middle):
All Other Names used by the Debtor in the last 8 years (include married, maiden, and trade names):		All Other Names used by the Joint Debtor in the last 8 years (include married, maiden, and trade names):
Last four digits of Soc. Sec. or Individual-Taxpayer I.D. (ITIN) No./Complete EIN (if more than one, state all) 20-2956909		Last four digits of Soc. Sec. or Individual-Taxpayer I.D. (ITIN) No./Complete EIN (if more than one, state all)
Street Address of Debtor (No. and Street, City, and State): 206 8th Street North Columbus, MS <div style="text-align: right;">ZIP Code 39703</div>		Street Address of Joint Debtor (No. and Street, City, and State): <div style="text-align: right;">ZIP Code</div>
County of Residence or of the Principal Place of Business: Lowndes		County of Residence or of the Principal Place of Business:
Mailing Address of Debtor (if different from street address): PO Box 1076 Columbus, MS <div style="text-align: right;">ZIP Code 39703</div>		Mailing Address of Joint Debtor (if different from street address): <div style="text-align: right;">ZIP Code</div>
Location of Principal Assets of Business Debtor (if different from street address above):		
Type of Debtor (Form of Organization) (Check one box) <input type="checkbox"/> Individual (includes Joint Debtors) <i>See Exhibit D on page 2 of this form.</i> <input checked="" type="checkbox"/> Corporation (includes LLC and LLP) <input type="checkbox"/> Partnership <input type="checkbox"/> Other (If debtor is not one of the above entities, check this box and state type of entity below.)	Nature of Business (Check one box) <input type="checkbox"/> Health Care Business <input type="checkbox"/> Single Asset Real Estate as defined in 11 U.S.C. § 101 (51B) <input type="checkbox"/> Railroad <input type="checkbox"/> Stockbroker <input type="checkbox"/> Commodity Broker <input type="checkbox"/> Clearing Bank <input checked="" type="checkbox"/> Other Tax-Exempt Entity (Check box, if applicable) <input type="checkbox"/> Debtor is a tax-exempt organization under Title 26 of the United States Code (the Internal Revenue Code).	Chapter of Bankruptcy Code Under Which the Petition is Filed (Check one box) <input type="checkbox"/> Chapter 7 <input type="checkbox"/> Chapter 9 <input checked="" type="checkbox"/> Chapter 11 <input type="checkbox"/> Chapter 12 <input type="checkbox"/> Chapter 13 <input type="checkbox"/> Chapter 15 Petition for Recognition of a Foreign Main Proceeding <input type="checkbox"/> Chapter 15 Petition for Recognition of a Foreign Nonmain Proceeding Nature of Debts (Check one box) <input type="checkbox"/> Debts are primarily consumer debts, defined in 11 U.S.C. § 101(8) as "incurred by an individual primarily for a personal, family, or household purpose." <input checked="" type="checkbox"/> Debts are primarily business debts.
Filing Fee (Check one box) <input checked="" type="checkbox"/> Full Filing Fee attached <input type="checkbox"/> Filing Fee to be paid in installments (applicable to individuals only). Must attach signed application for the court's consideration certifying that the debtor is unable to pay fee except in installments. Rule 1005(b). See Official Form 3A. <input type="checkbox"/> Filing Fee waiver requested (applicable to chapter 7 individuals only). Must attach signed application for the court's consideration. See Official Form 3B.		Chapter 11 Debtors Check one box: <input type="checkbox"/> Debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). <input checked="" type="checkbox"/> Debtor is not a small business debtor as defined in 11 U.S.C. § 101(51D). Check if: <input type="checkbox"/> Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,343,300 (amount subject to adjustment on 4/01/13 and every three years thereafter). Check all applicable boxes: <input type="checkbox"/> A plan is being filed with this petition. <input type="checkbox"/> Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
Statistical/Administrative Information <input checked="" type="checkbox"/> Debtor estimates that funds will be available for distribution to unsecured creditors. <input type="checkbox"/> Debtor estimates that, after any exempt property is excluded and administrative expenses paid, there will be no funds available for distribution to unsecured creditors.		THIS SPACE IS FOR COURT USE ONLY
Estimated Number of Creditors <input type="checkbox"/> 1-49 <input checked="" type="checkbox"/> 50-99 <input type="checkbox"/> 100-199 <input type="checkbox"/> 200-999 <input type="checkbox"/> 1,000-5,000 <input type="checkbox"/> 5,001-10,000 <input type="checkbox"/> 10,001-25,000 <input type="checkbox"/> 25,001-50,000 <input type="checkbox"/> 50,001-100,000 <input type="checkbox"/> OVER 100,000		
Estimated Assets <input type="checkbox"/> 50 to \$50,000 <input type="checkbox"/> \$50,001 to \$100,000 <input type="checkbox"/> \$100,001 to \$500,000 <input type="checkbox"/> \$500,001 to \$1 million <input type="checkbox"/> \$1,000,001 to \$10 million <input checked="" type="checkbox"/> \$10,000,001 to \$50 million <input type="checkbox"/> \$50,000,001 to \$100 million <input type="checkbox"/> \$100,000,001 to \$500 million <input type="checkbox"/> \$500,000,001 to \$1 billion <input type="checkbox"/> More than \$1 billion		
Estimated Liabilities <input type="checkbox"/> 50 to \$50,000 <input type="checkbox"/> \$50,001 to \$100,000 <input type="checkbox"/> \$100,001 to \$500,000 <input type="checkbox"/> \$500,001 to \$1 million <input type="checkbox"/> \$1,000,001 to \$10 million <input checked="" type="checkbox"/> \$10,000,001 to \$50 million <input type="checkbox"/> \$50,000,001 to \$100 million <input type="checkbox"/> \$100,000,001 to \$500 million <input type="checkbox"/> \$500,000,001 to \$1 billion <input type="checkbox"/> More than \$1 billion		

Voluntary Petition <i>(This page must be completed and filed in every case)</i>		Name of Debtor(s): Maritime Communications/Land Mobile, LLC	
All Prior Bankruptcy Cases Filed Within Last 8 Years (If more than two, attach additional sheet)			
Location Where Filed: - None -	Case Number:	Date Filed:	
Location Where Filed:	Case Number:	Date Filed:	
Pending Bankruptcy Case Filed by any Spouse, Partner, or Affiliate of this Debtor (If more than one, attach additional sheet)			
Name of Debtor: - None -	Case Number:	Date Filed:	
District:	Relationship:	Judge:	
<p style="text-align:center;">Exhibit A</p> <p>(To be completed if debtor is required to file periodic reports (e.g., forms 10K and 10Q) with the Securities and Exchange Commission pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 and is requesting relief under chapter 11.)</p> <p><input type="checkbox"/> Exhibit A is attached and made a part of this petition.</p>	<p style="text-align:center;">Exhibit B</p> <p>(To be completed if debtor is an individual whose debts are primarily consumer debts.)</p> <p>I, the attorney for the petitioner named in the foregoing petition, declare that I have informed the petitioner that [he or she] may proceed under chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each such chapter. I further certify that I delivered to the debtor the notice required by 11 U.S.C. §342(b).</p> <p>X _____ Signature of Attorney for Debtor(s) (Date)</p>		
Exhibit C			
Does the debtor own or have possession of any property that poses or is alleged to pose a threat of imminent and identifiable harm to public health or safety?			
<input type="checkbox"/> Yes, and Exhibit C is attached and made a part of this petition. <input checked="" type="checkbox"/> No.			
Exhibit D			
(To be completed by every individual debtor. If a joint petition is filed, each spouse must complete and attach a separate Exhibit D.)			
<input type="checkbox"/> Exhibit D completed and signed by the debtor is attached and made a part of this petition. If this is a joint petition: <input type="checkbox"/> Exhibit D also completed and signed by the joint debtor is attached and made a part of this petition.			
Information Regarding the Debtor - Venue (Check any applicable box)			
<input checked="" type="checkbox"/> Debtor has been domiciled or has had a residence, principal place of business, or principal assets in this District for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other District. <input type="checkbox"/> There is a bankruptcy case concerning debtor's affiliate, general partner, or partnership pending in this District. <input type="checkbox"/> Debtor is a debtor in a foreign proceeding and has its principal place of business or principal assets in the United States in this District, or has no principal place of business or assets in the United States but is a defendant in an action or proceeding [in a federal or state court] in this District, or the interests of the parties will be served in regard to the relief sought in this District.			
Certification by a Debtor Who Resides as a Tenant of Residential Property (Check all applicable boxes)			
<input type="checkbox"/> Landlord has a judgment against the debtor for possession of debtor's residence. (If box checked, complete the following.) <div style="margin-left: 40px;">_____</div> <div style="margin-left: 40px;">(Name of landlord that obtained judgment)</div> <div style="margin-left: 40px;">_____</div> <div style="margin-left: 40px;">(Address of landlord)</div>			
<input type="checkbox"/> Debtor claims that under applicable nonbankruptcy law, there are circumstances under which the debtor would be permitted to cure the entire monetary default that gave rise to the judgment for possession, after the judgment for possession was entered, and <input type="checkbox"/> Debtor has included in this petition the deposit with the court of any rent that would become due during the 30-day period after the filing of the petition. <input type="checkbox"/> Debtor certifies that he/she has served the Landlord with this certification. (11 U.S.C. § 362(f)).			

<p>Voluntary Petition <i>(This page must be completed and filed in every case)</i></p>	<p>Name of Debtor(s): Maritime Communications/Land Mobile, LLC</p>
Signatures	
<p style="text-align: center;">Signature(s) of Debtor(s) (Individual/Joint)</p> <p>I declare under penalty of perjury that the information provided in this petition is true and correct. [If petitioner is an individual whose debts are primarily consumer debts and has chosen to file under chapter 7] I am aware that I may proceed under chapter 7, 11, 12, or 13 of title 11, United States Code, understand the relief available under each such chapter, and choose to proceed under chapter 7. [If no attorney represents me and no bankruptcy petition preparer signs the petition] I have obtained and read the notice required by 11 U.S.C. §342(b).</p> <p>I request relief in accordance with the chapter of title 11, United States Code, specified in this petition.</p> <p>X _____ Signature of Debtor</p> <p>X _____ Signature of Joint Debtor</p> <p>_____ Telephone Number (If not represented by attorney)</p> <p>_____ Date</p>	<p style="text-align: center;">Signature of a Foreign Representative</p> <p>I declare under penalty of perjury that the information provided in this petition is true and correct, that I am the foreign representative of a debtor in a foreign proceeding, and that I am authorized to file this petition.</p> <p>(Check only one box.)</p> <p><input type="checkbox"/> I request relief in accordance with chapter 15 of title 11, United States Code. Certified copies of the documents required by 11 U.S.C. §1515 are attached.</p> <p><input type="checkbox"/> Pursuant to 11 U.S.C. §1511, I request relief in accordance with the chapter of title 11 specified in this petition. A certified copy of the order granting recognition of the foreign main proceeding is attached.</p> <p>X _____ Signature of Foreign Representative</p> <p>_____ Printed Name of Foreign Representative</p> <p>_____ Date</p>
<p style="text-align: center;">Signature of Attorney*</p> <p>X /s/ Craig M. Geno Signature of Attorney for Debtor(s)</p> <p>Craig M. Geno 4793 Printed Name of Attorney for Debtor(s)</p> <p>Harris Jernigan & Geno, PLLC Firm Name</p> <p>587 Highland Colony Parkway (39157) P. O. Box 3380 Ridgeland, MS 39158-3380</p> <p>_____ Address</p> <p>601-427-0048 Fax: 601-427-0050 Telephone Number</p> <p>August 1, 2011 Date</p> <p><small>*In a case in which § 707(b)(4)(D) applies, this signature also constitutes a certification that the attorney has no knowledge after an inquiry that the information in the schedules is incorrect.</small></p>	<p style="text-align: center;">Signature of Non-Attorney Bankruptcy Petition Preparer</p> <p>I declare under penalty of perjury that: (1) I am a bankruptcy petition preparer as defined in 11 U.S.C. § 110; (2) I prepared this document for compensation and have provided the debtor with a copy of this document and the notices and information required under 11 U.S.C. §§ 110(b), 110(h), and 342(b); and, (3) if rules or guidelines have been promulgated pursuant to 11 U.S.C. § 110(h) setting a maximum fee for services chargeable by bankruptcy petition preparers, I have given the debtor notice of the maximum amount before preparing any document for filing for a debtor or accepting any fee from the debtor, as required in that section. Official Form 19 is attached.</p> <p>_____ Printed Name and title, if any, of Bankruptcy Petition Preparer</p> <p>_____ Social-Security number (If the bankruptcy petition preparer is not an individual, state the Social Security number of the officer, principal, responsible person or partner of the bankruptcy petition preparer.) (Required by 11 U.S.C. § 110.)</p> <p>_____ Address</p> <p>X _____ Date</p> <p>Signature of Bankruptcy Petition Preparer or officer, principal, responsible person, or partner whose Social Security number is provided above.</p> <p>Names and Social-Security numbers of all other individuals who prepared or assisted in preparing this document unless the bankruptcy petition preparer is not an individual:</p> <p>_____ If more than one person prepared this document, attach additional sheets conforming to the appropriate official form for each person.</p> <p><small>A bankruptcy petition preparer's failure to comply with the provisions of title 11 and the Federal Rules of Bankruptcy Procedure may result in fines or imprisonment or both 11 U.S.C. §110; 18 U.S.C. §156.</small></p>
<p style="text-align: center;">Signature of Debtor (Corporation/Partnership)</p> <p>I declare under penalty of perjury that the information provided in this petition is true and correct, and that I have been authorized to file this petition on behalf of the debtor.</p> <p>The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.</p> <p>X /s/ Sandra M. DePriest Signature of Authorized Individual</p> <p>Sandra M. DePriest Printed Name of Authorized Individual</p> <p>President Title of Authorized Individual</p> <p>August 1, 2011 Date</p>	

ATTACHMENT B

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

Cochran U.S. Bankruptcy Courthouse
703 Highway 145 North
Aberdeen, MS 39730
Telephone: 662-369-2596

In Maritime Communications/Land Mobile,
Re: LLC
Debtor(s)

Case No.: 11-13463-DWH
Chapter: 11

ORDER AND NOTICE OF FILING DEADLINE

To Debtor(s) and Debtor's attorney, if any:

**THIS CASE IS SUBJECT TO DISMISSAL WITHIN 14 DAYS FOR
FAILURE TO FILE DOCUMENTS THAT SHOULD HAVE BEEN
FILED WITH THE PETITION.**

In order for this case to be administered, it is necessary that the documents described below be filed within 14 days:

Chapter 11 Matrix due 08/17/2011
Chap 11 Verification of Matrix due 08/17/2011
20 Largest Unsecured Creditors due 08/17/2011

If the required documents are not timely filed by the above date the Court may enter an ex parte order dismissing the case without further notice. As mandated by Rule 1007(a)(5), F.R.Bk.P., any extension of time for the filing of the aforementioned items may be granted only on motion supported by a factual sworn affidavit showing good cause and on notice to the United States Trustee (supported by a filed certificate of service) and any committee appointed pursuant to 11 U.S.C. Section 1102, or other party as the court may direct.

Dated and Entered: 8/3/11

David W. Houston III
Judge, U.S. Bankruptcy Court

ATTACHMENT C

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**
Cochran U.S. Bankruptcy Courthouse
703 Highway 145 North
Aberdeen, MS 39730
Telephone: 662-369-2596

In Re: Maritime Communications/Land Mobile, LLC
Debtor(s)

Case No.: 11-13463-DWH
Chapter: 11
Judge: David W. Houston III

**ORDER AND NOTICE AS TO DEFICIENCY(IES) AND
PROPOSED DISMISSAL OF CASE**

Pursuant to the U.S. Bankruptcy Code, Federal Rules of Bankruptcy Procedure, Uniform Local Rules, and standing orders, the Debtor(s) has 14 days from the date of filing the above-captioned case to file the required paperwork and pay fees as applicable. The Court will not routinely grant extensions of time to file such paperwork. A motion for extension must be supported by a factual sworn affidavit showing good cause.

In order for this case to be administered, it is necessary that the documents described below be filed within 14 days:

Schedule F due 08/17/2011
Schedule G due 08/17/2011
Statement of Financial Affairs due 08/17/2011
Aty Disclosure Stmt. due 08/17/2011
Summary of Schedules due 08/17/2011
Schedule H due 08/17/2011
Schedule A due 08/17/2011
Equity Security Holders List due 08/17/2011
Schedule B due 08/17/2011
Schedule D due 08/17/2011
Schedule E due 08/17/2011

To permit time for this noticing, if the required paperwork and/or fees are not timely filed and/or paid by 8/17/11 the Court will enter an ex parte order dismissing the case without further hearing.

Dated and Entered: 8/3/11

David W. Houston III
Judge, U.S. Bankruptcy Court

ATTACHMENT D

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**
Cochran U.S. Bankruptcy Courthouse
703 Highway 145 North
Aberdeen, MS 39730
Telephone: 662-369-2596

In Re: Maritime Communications/Land
Mobile, LLC
Debtor(s)

Case No.: 11-13463-DWH
Chapter: 11

**NOTICE TO SUBMIT
CORPORATE OWNERSHIP STATEMENT**

Pursuant to Federal Rules of Bankruptcy Procedure 7007.1 and 1007(a), a corporation which is a party to an adversary proceeding, or a debtor in a bankruptcy case, must file a statement that identifies any corporation, other than a governmental unit, that directly or indirectly owns 10% or more of any class of the corporation's equity interests, or states that there are no such entities to report.

Maritime Communications/Land Mobile, LLC, a corporation and a party in the above styled adversary proceeding, or the debtor in the above styled bankruptcy case, has failed to submit the required Corporate Ownership Statement.

If the Corporate Ownership Statement requested hereby is not received or filed within 14 days from the date of this Notice, a Show Cause hearing will be scheduled at which the corporation will be required to appear through counsel and show cause why sanctions should not be imposed, or the case dismissed, for failure to submit the required Corporate Ownership Statement.

(A form Corporate Ownership Statement, suitable to the court, may be found on the court's website at www.msnb.uscourts.gov).

David J. Puddister
Clerk, U.S. Bankruptcy Court
BY: SFP
Deputy Clerk

DATE OF ISSUANCE: 8/4/11