

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

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

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

**JOINT STATUS REPORT**

1. By *Patrick Sullivan, et al.*, Order, FCC 14M-21 (ALJ, rel. June 25, 2014), the Presiding Judge directed the parties in this proceeding to jointly file a report on or before July 30, 2014, on the status of their trial preparations. Pursuant to that directive, Patrick Sullivan, Lake Broadcasting, Inc. ("Lake Broadcasting"), and the Enforcement Bureau ("Bureau") (collectively, "Parties") hereby submit their report.

2. The Parties, through their respective counsel, have conferred about discovery in this proceeding. During those discussions counsel for Patrick Sullivan and Lake Broadcasting informed the Bureau that he would be traveling during the last two weeks of July and unable to respond to any discovery requests that the Bureau might serve during that time. Consequently, Bureau counsel agreed to defer serving any discovery

requests on Patrick Sullivan and/or Lake Broadcasting until counsel for those parties returned to Washington, DC.

3. Pursuant to the schedule to which the Parties have mutually agreed, the Bureau anticipates that on August 5, 2014, it will serve the following three documents on Lake Broadcasting: Enforcement Bureau's Request for Admissions of Fact and Genuineness of Documents to Lake Broadcasting, Inc.;<sup>1</sup> Enforcement Bureau's First Set of Interrogatories to Lake Broadcasting, Inc.; and Enforcement Bureau's First Request for the Production of Documents to Lake Broadcasting, Inc. The Bureau also anticipates conducting depositions of certain individuals, the names of whom have not yet been determined.

4. Lake Broadcasting's counsel has attempted to engage the services of Dr. Wayne A. Stillings who served as Michael Rice's psychiatrist for many years and who participated in the last FCC hearing involving Mr. Rice. Lake Broadcasting believes that continuity of medical expertise would be useful in gauging Mr. Rice's rehabilitation. However, Dr. Stillings has not responded to several voicemail messages, suggesting that he may be on vacation. If he does not respond by telephone within a reasonable period of time, counsel will attempt to contact him via mail.

5. At the prehearing conference in this proceeding, the Bureau indicated that it intended to retain an expert witness to review any medical reports prepared by psychologists, psychiatrists and/or therapists for Michael Rice.<sup>2</sup> The Bureau wishes to inform the Presiding Judge that it may seek leave to have its expert witness also conduct

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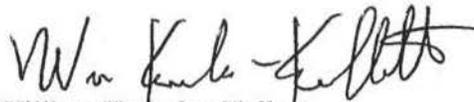
<sup>1</sup> The Parties understand that authority for serving requests for admissions of fact and genuineness of documents is found in Section 1.246 of the Commission's Rules, and therefore such request are technically not part of the discovery process contained in Section 1.311, *et seq.*

<sup>2</sup> Tr. p. 11.

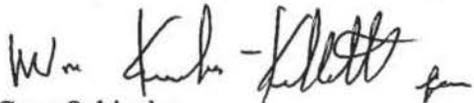
an independent medical examination of Mr. Rice to ensure that the record developed in this proceeding is full and complete and one upon which the Presiding Judge may make a reasoned decision on all of the designated issues.

6. Counsel for Patrick Sullivan and Lake Broadcasting has reviewed this joint report and has authorized the Bureau to file it on his clients' behalf.

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  
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(202) 418-1420

July 30, 2014

**CERTIFICATE OF SERVICE**

I, Moris Martinez, an Enforcement Analyst in the Enforcement Bureau's Investigations & Hearings Division, certify that on this 30<sup>th</sup> day of July 2014, I sent via First Class United States Mail and via email copies of the foregoing Joint Status Report to:

Jerold L. Jacobs, Esq.  
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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

  
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Moris Martinez