

Hill Broadcasting Company, Inc.  
P.O. Box 131206  
Birmingham, AL 35213

Ms. Barbara A. Kreisman, Chief  
Video Division  
Media Bureau  
Mr. Hossein Hashemzadeh  
Deputy Chief, Video Division  
Media Bureau  
Federal Communications Commission  
Washington, D.C. 20554

RECEIVED - FCC

DEC - 4 2014

Federal Communications Commission  
Bureau / Office

Re: DKTG-TV, Grand Island, NE (Facility ID: 27220); BRC DT-20140530ANP;  
Petition for Reconsideration and Request for Reinstatement of License  
Renewal *nunc pro tunc*.

Dear Ms. Kreisman and Mr. Hashemzadeh:

Hill Broadcasting Company, Inc. (Hill) hereby respectfully submits that the premise of Ms. Kreisman's letter of April 22, 2014 is simply factually incorrect. For the reasons stated below, Hill respectfully requests that the license and call letters for KTVG-TV be reinstated and the license renewal application which was dismissed on October 30, 2014<sup>1</sup> be reinstated *nunc pro tunc*.

- 1) The "ongoing bankruptcy proceeding" referred to in Mr. Pendarvis' letter of October 2009 has in fact not been concluded. While Harry J. and Stella A. Pappas were discharged from bankruptcy on January 3, 2012, the Chapter 11 bankruptcy proceeding continues before the U.S. Bankruptcy Court for the District of Delaware, Case No: 08-10949 (the "Case"). Please find attached hereto as Exhibit 1 a copy of a Letter from Patrick A. Jackson, Esq., who is the Pappas's bankruptcy counsel. He confirms the Case is still ongoing. Lastly attached hereto as Exhibit 2 is a print out of "PACER Case Locator" page for this Delaware Case; as can be seen, this Case is not closed as of today's date.
- 2) *Inter alia*, the Pappas Liquidating Trust was established by the Pappas's to succeed to all their liabilities, all of the Pappas's non-exempt assets were assigned to the Pappas Liquidating Trust (PLT), including those in Nebraska, and the Pappas's remain as Ultimate Beneficiaries of the PLT after all liabilities are satisfied in accordance with the terms of the Reorganization Plan and the PLT.
- 3) At this time, the proceeding "has prevented the construction of (KTVG-TV's) digital facilities".
- 4) Mr. Harry J. Pappas has continuously reassured me that once the proceeding in Case No: 08-10949 has been concluded that steps would be taken to complete construction of KTVG-TV's digital facilities in accordance with the terms of its digital construction permit, BMPCDT-20090224ACD within the six month period referred to in Mr. Pendarvis' letter.

---

<sup>1</sup> FCC Public Notice 48359, released November 4, 2014.

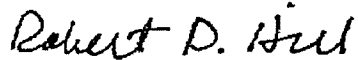
- 5) No Petition for Reconsideration should be required where the Commission has factually erred in the premise relied upon in the April 22, 2014 letter. A simple inquiry of this licensee as to the status of the Case would have been adequate.

Counsel has not been available to me for this response and, therefore, I further respectfully request that the Commission waive any procedural errors on my part.

For the foregoing reasons, Hill respectfully requests that the license and call letters for KTVG-TV be reinstated and the license renewal application be reinstated and granted.

Respectfully submitted,

Hill Broadcasting Company, Inc.



Robert D. Hill  
President

December 4, 2014

Exhibit 1

**YC** **YOUNG CONAWAY**  
**ST** **STARGATT & TAYLOR, LLP**

*Attorneys at Law*

WILMINGTON  
GEORGETOWN  
MIDDLETOWN  
NEW YORK

Patrick A. Jackson  
P 302.576.3588  
F 302.576.3544  
pjackson@ycst.com

December 4, 2014

VIA EMAIL

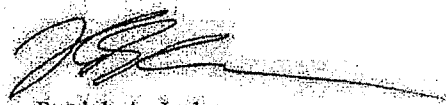
Robert Hill  
Hill Broadcasting Company, Inc.  
[robhilljr@aol.com](mailto:robhilljr@aol.com)

Re: Harry J. Pappas Bankruptcy Proceedings

Dear Mr. Hill:

As you know, I was counsel to Harry J. and Stella A. Pappas in their personal chapter 11 bankruptcy proceedings in the United States Bankruptcy Court for the District of Delaware, and I am currently counsel for the Pappas Liquidating Trust, which was created pursuant to the Pappases' confirmed chapter 11 plan to liquidate assets for the benefit of creditors. This letter will confirm that the bankruptcy cases are still open and are pending in the bankruptcy court under the caption *In re Pappas Liquidating Trust, Inc.*, Case No. 08-10949 (PJW) (Jointly Administered). Attached for your reference is a docket report from the case illustrating the last two months' filing activity.

Regards,



Patrick A. Jackson

PAJ:PAJ

Enclosure

Rodney Square • 1000 North King Street • Wilmington, DE 19801  
P 302.571.6600 F 302.571.1253 [YoungConaway.com](http://YoungConaway.com)

**LEAD, CONVERTED, CLMSAGNT, CLAIMS, CONFIRMED**

**U.S. Bankruptcy Court  
District of Delaware (Delaware)  
Bankruptcy Petition #: 08-10949-PJW**

*Assigned to:* Peter J. Walsh  
Chapter 11  
Previous chapter 7  
Voluntary  
Asset

*Date filed:* 05/12/2008  
*Date converted:* 05/27/2008  
*Plan confirmed:* 11/10/2011

**Debtor**  
**Pappas Liquidating Trust,**  
8770 Lakeside Drive  
Reno, NV 89511  
OUTSIDE HOME STATE  
SSN/ITIN: xxx-xx-2944  
*fka* Harry J. Pappas and Stella A. Pappas

represented by **Erin Edwards**  
Young, Conaway, Stargatt &  
Taylor  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
302-571-6600  
Email: [bankfilings@ycst.com](mailto:bankfilings@ycst.com)

**William B. Freeman**  
Katten Muchin Roseman LLP  
515 S. Flower Street,  
Suite 1000  
Los Angeles, CA 90071  
213-788-7450  
Fax: 213-788-7380

**Frank Grese, III**  
Young Conaway Stargatt &  
Taylor, LLP  
The Brandywine Building  
17th Floor  
1000 N. West Street  
Wilmington, DE 19801  
302-571-6600  
Email: [bankfilings@ycst.com](mailto:bankfilings@ycst.com)

**Edwin J. Harron**  
Young, Conaway, Stargatt &  
Taylor  
The Brandywine Building  
1000 West Street, 17th Floor  
PO Box 391  
Wilmington, DE 19899-0391  
302-571-6600

Fax: 302-571-1253  
Email: [bankfilings@ycst.com](mailto:bankfilings@ycst.com)

**Patrick A. Jackson**  
Young Conaway Stargatt &  
Taylor, LLP  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
302-571-6600  
Email: [bankfilings@ycst.com](mailto:bankfilings@ycst.com)

**Pauline K. Morgan**  
Young Conaway Stargatt &  
Taylor, LLP  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
302-571-6600  
Fax: 302-571-1253  
Email: [bankfilings@ycst.com](mailto:bankfilings@ycst.com)

**Laurel D. Roglen**  
Young Conaway Stargatt &  
Taylor, LLP  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
302-571-6600  
Email: [bankfilings@ycst.com](mailto:bankfilings@ycst.com)

**Justin H. Ruckl**  
Young Conaway Stargatt &  
Taylor, LLP  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
302-571-6600  
Email: [bankfilings@ycst.com](mailto:bankfilings@ycst.com)

**U.S. Trustee**  
**United States Trustee**  
844 King Street, Room 2207  
Lockbox #35  
Wilmington, DE 19899-0035  
302-573-6491

**Claims Agent**  
**Kurtzman Carson Consultants LLC**  
[www.kccelle.com](http://www.kccelle.com)

represented by **Albert Kass**  
Kurtzman Carson Consultants,  
LLC

2335 Alaska Ave  
El Segundo, CA 90245  
310-823-9000

2335 Alaska Ave  
El Segundo, CA 90245  
310-823-9000  
Fax : 310-751-1549  
Email: [ECFpleadings@kcelle.com](mailto:ECFpleadings@kcelle.com)

**Liquidating Trustee**  
**Liquidating Trustee**

Filing Date	#	Docket Text
10/07/2014	<u>1692</u> (4 pgs)	Affidavit/Declaration of Service Regarding Agendas Scheduled for Hearing on September 24, 2014 (related document(s) 1685, 1687) Filed by Pappas Liquidating Trust, (Roglen, Laurel) (Entered: 10/07/2014)
10/07/2014	<u>1693</u> (7 pgs)	Affidavit/Declaration of Service Regarding Order Authorizing Distribution of Advisory Letter to Members of Pappas Telecasting of Iowa, L.L.C. (related document(s) 1686) Filed by Pappas Liquidating Trust, (Roglen, Laurel) (Entered: 10/07/2014)
10/07/2014	<u>1694</u> (7 pgs)	Affidavit/Declaration of Service Regarding Order Approving Stipulation Regarding Conveyance of Weston Meadows Property of The Stanley and Carol Trapp Trust in Accordance with the Chapter 11 Plan (related document(s) 1690) Filed by Pappas Liquidating Trust, (Roglen, Laurel) (Entered: 10/07/2014)
10/14/2014	<u>1695</u> (5 pgs)	Status Report (related document(s) 1680) Filed by Pappas Liquidating Trust, (Jackson, Patrick) (Entered: 10/14/2014)
10/17/2014	<u>1696</u> (2 pgs)	Certification of Counsel Regarding Scheduling of Omnibus Hearing Dates Filed by Pappas Liquidating Trust, (Jackson, Patrick) (Entered: 10/17/2014)
10/17/2014	<u>1697</u> (3 pgs)	HEARING CANCELLED/RESCHEDULED. Notice of Agenda of Matters Scheduled for Hearing. Filed by Pappas Liquidating Trust, Hearing scheduled for 10/22/2014 at 03:00 PM at US Bankruptcy Court, 824 Market St., 6th Fl., Courtroom #2, Wilmington, Delaware. (Jackson, Patrick) (Entered: 10/17/2014)

10/20/2014	<u>1698</u> (1 pg)	Order Scheduling Omnibus Hearings. All hearings will be held at US Bankruptcy Court, 824 Market St., 6th Fl., Courtroom #2, Wilmington, Delaware (Related document(s) <u>1696</u> ). Omnibus Hearings scheduled for 11/17/2014 at 11:30 AM., 12/16/2014 at 10:30 AM. Signed on 10/17/2014. (NAB) (Entered: 10/20/2014)
10/28/2014	<u>1699</u> (91 pgs; 5 docs)	Motion of David P. Stapleton, as Successor Liquidating Trustee Under the Chapter 11 Plan, for Entry of an Order Authorizing Him to Exercise His Controlling Interest in Pappas Telecasting of Iowa, L.L.C. and KCWI License, LLC to Authorize a Sale of Their Assets and Granting Related Relief Filed by Pappas Liquidating Trust. Hearing scheduled for 11/17/2014 at 11:30 AM at US Bankruptcy Court, 824 Market St., 6th Fl., Courtroom #2, Wilmington, Delaware. Objections due by 11/10/2014. (Attachments: # 1 Notice # 2 Exhibit A # 3 Exhibit B # 4 Exhibit C) (Jackson, Patrick) Modified text on 10/30/2014 (NAB). (Entered: 10/28/2014)
10/29/2014	<u>1700</u> (7 pgs)	Affidavit/Declaration of Service Regarding Status Report (related document(s) <u>1695</u> ) Filed by Pappas Liquidating Trust, (Jackson, Patrick) (Entered: 10/29/2014)
10/29/2014	<u>1701</u> (4 pgs)	Affidavit/Declaration of Service Regarding Notice of Agenda of Matters Scheduled for Hearing on October 22, 2014 at 3:00 p.m. (related document(s) <u>1697</u> ) Filed by Pappas Liquidating Trust, (Jackson, Patrick) (Entered: 10/29/2014)
11/04/2014	<u>1702</u>	Request for Transcript of hearing held on 3-11-2014 received. To obtain a copy of this transcript, contact the Court Reporter/Transcriber, Reliable, at telephone number: 302-654-8080. (MPM) (Entered: 11/04/2014)
	<u>1703</u> (2 pgs; 2 docs)	Transcript regarding Hearing Held 03/11/2014 RE: Omnibus Hearing. Remote electronic access to the transcript is restricted until 2/3/2015. The transcript may be viewed at the Bankruptcy Court Clerk's Office. [For information about how to contact the transcriber, call the Clerk's Office] or [Contact the Court Reporter/Transcriber, Reliable, at telephone number: 302-654-8080.] Notice of Intent to



11/05/2014		Request Redaction Deadline Due By 11/12/2014. Redaction Request Due By 11/26/2014. Redacted Transcript Submission Due By 12/8/2014. Transcript access will be restricted through 2/3/2015. (related document(s) <u>1591</u> ) (MPM) (Entered: 11/05/2014)
11/07/2014	<u>1704</u> (8 pgs)	Affidavit/Declaration of Service Regarding (1) Order Scheduling Hearing Dates; and (2) Motion of David P. Stapleton, as Successor Liquidating Trustee Under the Chapter 11 Plan, for Entry of an Order Authorizing Him to Exercise His Controlling Interest in Pappas Telecasting of Iowa, L.L.C. and KCWI License, LLC to Authorize a Sale of Their Assets and Granting Related Relief (related document(s) <u>1698</u> , <u>1699</u> ) Filed by Pappas Liquidating Trust, (Roglen, Laurel) (Entered: 11/07/2014)
11/07/2014	<u>1705</u> (3 pgs)	BNC Certificate of Mailing. (related document(s) <u>1703</u> ) Notice Date 11/07/2014. (Admin.) (Entered: 11/08/2014)
11/10/2014	<u>1706</u> (107 pgs; 4 docs)	Objection of Harry J. Pappas and Stella A. Pappas, as Ultimate Beneficiaries Under the Chapter 11 Plan, to Motion of David P. Stapleton for Entry of an Order Authorizing Him to Exercise His Controlling Interest in Pappas Telecasting of Iowa, L.L.C. and KCWI License, LLC to Authorize a Sale of their Assets and Granting Related Relief (related document(s) <u>1699</u> ) Filed by Harry J. Pappas, Stella A. Pappas (Attachments: # <u>1</u> Exhibit A # <u>2</u> Exhibit B # <u>3</u> Exhibit C) (McLaughlin, John) (Entered: 11/10/2014)
11/11/2014	<u>1707</u> (4 pgs; 2 docs)	Affidavit of Service Re: Objection of Harry J. Pappas and Stella A. Pappas, as Ultimate Beneficiaries Under the Chapter 11 Plan, to Motion of David P. Stapleton for Entry of an Order Authorizing Him to Exercise His Controlling Interest in Pappas Telecasting of Iowa, L.L.C. and KCWI License, LLC to Authorize a Sale of their Assets and Granting Related Relief. (related document(s) <u>1706</u> ) Filed by Harry J. & Stella A. Pappas. (Attachments: # <u>1</u> Exhibit A) (McLaughlin, John) Modified docket text on 11/13/2014 (LMD). (Entered: 11/11/2014)

11/11/2014	<u>1708</u> (2 pgs)	Certificate of Service <i>re: Objection of Harry J. Pappas and Stella A. Pappas, as Ultimate Beneficiaries Under the Chapter 11 Plan, to Motion of David P. Stapleton for Entry of an Order Authorizing Him to Exercise His Controlling Interest in Pappas Telecasting of Iowa, L.L.C. and KCWI License, LLC to Authorize a Sale of their Assets and Granting Related Relief</i> (related document(s) <u>1706</u> ) Filed by Harry J. & Stella A. Pappas. (McLaughlin, John) (Entered: 11/11/2014)
11/13/2014	<u>1709</u> (3 pgs)	HEARING CANCELLED/RESCHEDULED. Notice of Agenda of Matters Scheduled for Hearing. Filed by Pappas Liquidating Trust,. Hearing scheduled for 11/17/2014 at 11:30 AM at US Bankruptcy Court, 824 Market St., 6th Fl., Courtroom #2, Wilmington, Delaware. (Jackson, Patrick) (Entered: 11/13/2014)
11/13/2014	<u>1710</u> (56 pgs; 3 docs)	Notice of Filing of Invoices. (related document(s) <u>1133</u> ) Filed by Pappas Liquidating Trust,. (Attachments: # <u>1</u> Exhibit A # <u>2</u> Exhibit B) (Jackson, Patrick) Modified text on 11/13/2014 (TMB). (Entered: 11/13/2014)
11/25/2014	<u>1711</u> (2 pgs)	Certificate of No Objection <i>Regarding Notice of Filing of Invoices</i> (related document(s) <u>1710</u> ) Filed by Pappas Liquidating Trust,. (Jackson, Patrick) (Entered: 11/25/2014)
11/25/2014	<u>1712</u> (20 pgs; 4 docs)	Motion of David P. Stapleton, as Liquidating Trustee Under the Chapter 11 Plan, for Entry of an Order Authorizing and Directing Turnover of the Greek Properties to the Liquidating Trust Filed by Pappas Liquidating Trust,. Hearing scheduled for 12/16/2014 at 10:30 AM at US Bankruptcy Court, 824 Market St., 6th Fl., Courtroom #2, Wilmington, Delaware. Objections due by 12/9/2014. (Attachments: # <u>1</u> Notice # <u>2</u> Exhibit A # <u>3</u> Exhibit B) (Jackson, Patrick) Modified text on 11/26/2014 (NAB). (Entered: 11/25/2014)
12/03/2014	<u>1713</u> (4 pgs)	Affidavit/Declaration of Service <i>Regarding Notice of Agenda of Matters Scheduled for Hearing on November 17, 2014 at 11:30 a.m.</i> (related document(s) <u>1709</u> ) Filed by Pappas Liquidating Trust,. (Jackson, Patrick) (Entered: 12/03/2014)

12/03/2014	<u>1714</u> (7 pgs)	Affidavit/Declaration of Service Regarding Notice of Filing of Invoices (related document(s) 1710). Filed by Pappas Liquidating Trust, (Jackson, Patrick) (Entered: 12/03/2014)
12/03/2014	<u>1715</u> (7 pgs)	Affidavit/Declaration of Service Regarding Motion of David P. Stapleton, as Liquidating Trustee Under the Chapter 11 Plan, for Entry of an Order Authorizing and Directing Turnover of the Greek Properties to the Liquidating Trust (related document(s) 1712) Filed by Pappas Liquidating Trust, (Jackson, Patrick) (Entered: 12/03/2014)

PACER Service Center			
Transaction Receipt			
12/04/2014 14:13:52			
PACER Login:	yesl0001:2665664:0	Client Code:	072663.1001 pjack
Description:	Docket Report	Search Criteria:	08-10949-PJW Fil or Ent: filed From: 10/3/2014 To: 12/4/2014 Doc From: 0 Doc To: 99999999 Term: included Headers: included Format: html Page counts for documents: included
Billable Pages:	4	Cost:	0.40

## Exhibit 2



All Court Types Party Search  
Thu Dec 4 13:17:26 2014  
3 records found

User: PH1706  
Client: Hill  
Search: All Court Types Party Search Name Pappas 08-10949 Delaware Page: 1

**Bankruptcy Results**

<u>Party Name</u> ▼	<u>Court</u>	<u>Case</u>	<u>Ch</u>	<u>Date Filed</u>	<u>Date Closed</u>	<u>Disposition</u>
1 Pappas, Harry J. (intp)	debke	<u>1:08-bk-10949</u>	11	05/12/2008		
2 Pappas Liquidating Trust, (db)	debke	<u>1:08-bk-10949</u>	11	05/12/2008		
3 Pappas, Stella A. (intp)	debke	<u>1:08-bk-10949</u>	11	05/12/2008		

Receipt 12/04/2014 13:17:26 129992536

User PH1706

Client Hill

Description All Court Types Party Search

Name Pappas 08-10949 Delaware Page: 1

Pages 1 (\$0.10)