

# SCIARRINO & SHUBERT, PLLC

BROADCAST & MEDIA LEGAL SERVICES

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March 3, 2022

*VIA Email*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

Attention: Media Bureau, Audio Division

Re: KREV(FM), Alameda, CA (FIN: 36029) File No. 0000184727  
KRCK-FM, Mecca, CA (FIN: 52808) File No. 0000184726  
KFRH(FM), North Las Vegas, NV (FIN: 19062) File No.  
0000184728 (the “Stations”) <sup>1</sup>

Dear Ms. Dortch:

In light of the Commission’s grant of the above-reference applications for involuntary assignment of licenses to the Debtor-In-Possession companies controlled by Edward Stolz and the underlying Order of the Bankruptcy Court, W. Lawrence Patrick, by counsel and solely in his capacity as Court Appointed Receiver for the Stations, hereby requests that the Commission dismiss the applications listed below pending before the Commission. Mr. Patrick specifically requests that the Commission dismiss the following applications:

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<sup>1</sup> Mr. Patrick filed Notices of consummation of the involuntary assignments of license on February 22, 2022.

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1. Applications for Modification of License:

- a. KREV(FM) File No. 0000130809;
- b. KRCK-FM File No. 0000130807; and
- c. KFRH(FM) File No. 0000130810.

2. Application for Assignment of Licenses:

- a. KREV(FM), KRECK-FM and KFRH(FM) Lead File Number: 0000130216.

Mr. Patrick does not seek dismissal of the applications for renewal of license as doing so would jeopardize the Stations' licenses in contradiction of various orders of the courts.<sup>2</sup>

Notwithstanding the foregoing, VCY and Mr. Patrick request that the "CBS Shareholders Agreements" filed in connection with the applications for license renewal be dismissed. Mr. Patrick further requests that the Commission promptly grant the applications for renewal of license.

The undersigned counsel spoke with counsel for VCY America, Inc. ("VCY"), the proposed Assignee of the Stations, and confirmed that it joins in the request for dismissal of the applications as specified above. Should you have any questions regarding this matter, kindly contact the undersigned counsel.

Very truly yours,

*/s/ Dawn M. Sciarrino*

Dawn M. Sciarrino  
Counsel to W. Lawrence Patrick, Receiver

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<sup>2</sup> See KREV(FM) File No. 0000155217, KRCK-FM File No. 0000155212 and KFRH(FM) File No. 0000149356.

Marlene H. Dortch

March 3, 2022

Page 3

cc via email only:

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