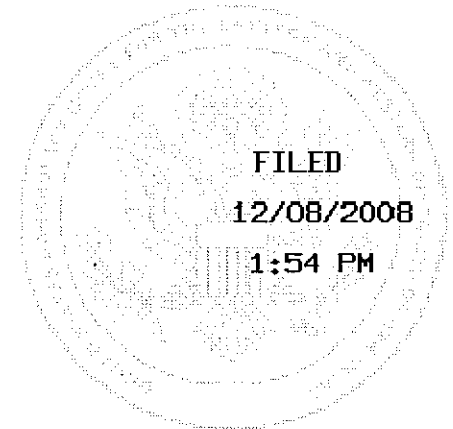


United States Bankruptcy Court  
Eastern District of Arkansas

**Notice of Bankruptcy Case Filing**

A bankruptcy case concerning the debtor(s) listed below was filed under Chapter 11 of the United States Bankruptcy Code, entered on 12/08/2008 at 1:54 PM and filed on 12/08/2008.



**Equity Media Holdings Corporation**

One Shackleford Drive, Suite 400

Little Rock, AR 72211

Tax ID / EIN: 20-2763411

*dba*

**Coconut Palm Acquisition Corp.**

*dba*

**Equity Broadcasting Corp.**

The case was filed by the debtor's attorney:

**James F. Dowden**

JAMES F. DOWDEN, P.A.

212 Center Street, 10th Floor

Little Rock, AR 72201

(501) 324-4700

The case was assigned case number 4:08-bk-17646 to Judge James G. Mixon.

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

If you would like to view the bankruptcy petition and other documents filed by the debtor, they are available at our Internet home page <http://www.arb.uscourts.gov> or at the Clerk's Office, U.S. Bankruptcy Court, 300 W. 2nd Street, Little Rock, AR 72201.

You may be a creditor of the debtor. If so, you will receive an additional notice from the court setting forth important deadlines.

**Jean Rolfs**  
**Clerk, U.S. Bankruptcy Court**

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF ARKANSAS

IN THE MATTER OF:

EQUITY MEDIA HOLDINGS  
CORPORATION  
DEBTOR

CASE NO. 4:08-BK-17646

CHAPTER 11

IN RE:

ARKANSAS 49, INC.

DEBTOR,

CASE NO. 4:08-BK-17869  
(Tax Id No: 71-0807226)

CHAPTER 11

IN RE:

EBC DETROIT, INC.

DEBTOR,

CASE NO. 4:08-BK-17870  
(Tax Id No: 73-1623476)

CHAPTER 11

IN RE:

EBC HARRISON, INC.

DEBTOR,

CASE NO. 4:08-BK-17871  
(Tax Id No: 74-2517189)

CHAPTER 11

IN RE:

BORGER BROADCASTING, INC.

DEBTOR,

CASE NO. 4:08-BK-17872  
(Tax Id No: 16-1662698)

CHAPTER 11

IN RE:

EBC JACKSONVILLE, INC.

DEBTOR,

CASE NO. 4:08-BK-17873  
(Tax Id No: 20-0067137)

CHAPTER 11

IN RE:  
C.A.S.H. SERVICES, INC.  
DEBTOR,

CASE NO. 4:08-BK-17874  
(Tax Id No: 20-1074798)

CHAPTER 11

IN RE:

EBC KANSAS CITY, INC.

DEBTOR,

CASE NO. 4:08-BK-17875  
(Tax Id No: 20-0768829)

CHAPTER 11

IN RE:

EQUITY NEWS SERVICES, INC.

DEBTOR,

CASE NO. 4:08-BK-17876  
(Tax Id No: 20-1085148)

CHAPTER 11

IN RE:

EBC LOS ANGELES, INC.

DEBTOR,

CASE NO. 4:08-BK-17877  
(Tax Id No: 20-0185936)

CHAPTER 11

IN RE:

DENVER BROADCASTING, INC.

DEBTOR,

CASE NO. 4:08-BK-17878  
(Tax Id No: 20-5617066)

CHAPTER 11

IN RE:

EBC MINNEAPOLIS, INC.

DEBTOR,

CASE NO. 4:08-BK-17879  
(Tax Id No: 20-1467198)

CHAPTER 11

IN RE:

EBC ATLANTA, INC.

DEBTOR,

CASE NO. 4:08-BK-17880  
(Tax Id No: 20-1076278)

CHAPTER 11



IN RE:	\$	
EBC SEATTLE, INC.	\$	CASE NO. 4:08-bk-17895
DEBTOR,	\$	(Tax Id No: 73-1604351)
	\$	CHAPTER 11
IN RE:	\$	
RIVER CITY BROADCASTING, INC.	\$	CASE NO. 4:08-bk-17896
DEBTOR,	\$	(Tax Id No: 73-1575630)
	\$	CHAPTER 11
IN RE:	\$	
EBC SOUTHWEST FLORIDA, INC.	\$	CASE NO. 4:08-bk-17897
DEBTOR,	\$	(Tax Id No: 03-0518310)
	\$	CHAPTER 11
IN RE:	\$	
ROSEBURG BROADCASTING, INC.	\$	CASE NO. 4:08-bk-17898
DEBTOR,	\$	(Tax Id No: 71-0808186)
	\$	CHAPTER 11
IN RE:	\$	
TV 34, INC.	\$	CASE NO. 4:08-bk-17899
DEBTOR,	\$	(Tax Id No: 20-1390170)
	\$	CHAPTER 11
IN RE:	\$	
EBC SYRACUSE, INC.	\$	CASE NO. 4:08-bk-17900
DEBTOR,	\$	(Tax Id No: 94-3415966)
	\$	CHAPTER 11
IN RE:	\$	
EBC POCATELLO, INC.	\$	CASE NO. 4:08-bk-17901
DEBTOR,	\$	(Tax Id No: 73-1621056)
	\$	CHAPTER 11

IN RE:	\$	
EBC ST. LOUIS, INC.	\$	CASE NO. 4:08-bk-17902
DEBTOR,	\$	(Tax Id No: 73-1574046)
	\$	CHAPTER 11
IN RE:	\$	
EBC WATERLOO, INC.	\$	CASE NO. 4:08-bk-17903
DEBTOR,	\$	(Tax Id No: 73-1579129)
	\$	CHAPTER 11
IN RE:	\$	
LA GRANDE BROADCASTING, INC.	\$	CASE NO. 4:08-bk-17904
DEBTOR,	\$	(Tax Id No: 73-1620648)
	\$	CHAPTER 11
IN RE:	\$	
MONTGOMERY 22, INC.	\$	CASE NO. 4:08-bk-17905
DEBTOR,	\$	(Tax Id No: 20-1284107)
	\$	CHAPTER 11
IN RE:	\$	
SHAWNEE BROADCASTING, INC.	\$	CASE NO. 4:08-bk-17906
DEBTOR,	\$	(Tax Id No: 62-1687531)
	\$	CHAPTER 11
IN RE:	\$	
EBC WACO, INC.	\$	CASE NO. 4:08-bk-17907
DEBTOR,	\$	(Tax Id No: 35-2182214)
	\$	CHAPTER 11
IN RE:	\$	
VERNAL BROADCASTING, INC.	\$	CASE NO. 4:08-bk-17908
DEBTOR,	\$	(Tax Id No: 73-1602592)
	\$	CHAPTER 11

IN RE:	§			
WYOMING CHANNEL 2, INC.	§		CASE NO. 4:08-bk-17909	
DEBTOR,	§		(Tax Id No: 73-1602593)	
	§		CHAPTER 11	
IN RE:	§			
K&H PROPERTIES LIMITED	§		CASE NO. 4:08-bk-17910	
PARTNERSHIP	§		(Tax Id No: 73-1614321)	
DEBTOR,	§		CHAPTER 11	
IN RE:	§			
WOODWARD BROADCASTING, INC.	§		CASE NO. 4:08-bk-17911	
DEBTOR,	§		(Tax Id No: 54-2101251)	
	§		CHAPTER 11	
IN RE:	§			
MONTANA BROADCASTING GROUP, INC.	§		CASE NO. 4:08-bk-17912	
DEBTOR,	§		(Tax Id No: 73-1623477)	
	§		CHAPTER 11	
IN RE:	§			
CENTRAL ARKANSAS PAYROLL	§		CASE NO. 4:08-bk-17913	
COMPANY	§		(Tax Id No: 20-2835555)	
DEBTOR,	§		CHAPTER 11	
IN RE:	§			
MONTANA LICENSE SUB, INC.	§		CASE NO. 4:08-bk-17914	
DEBTOR,	§		(Tax Id No: 30-0171138)	
	§		CHAPTER 11	
IN RE:	§			
EQUITY BROADCASTING CORPORATION	§		CASE NO. 4:08-bk-17915	
DEBTOR,	§		(Tax Id No: 94-3415525)	
	§		CHAPTER 11	

IN RE:	§			
EQUITY INSURANCE INC.	§		CASE NO. 4:08-bk-17916	
DEBTOR,	§		(Tax Id No: 20-1382413)	
	§		CHAPTER 11	
IN RE:	§			
KLRA, INC.	§		CASE NO. 4:08-bk-17917	
DEBTOR,	§		(Tax Id No: 73-1588827)	
	§		CHAPTER 11	
IN RE:	§			
EBC MT. VERNON, INC.	§		CASE NO. 4:08-bk-17918	
DEBTOR,	§		(Tax Id No: 73-1592059)	
	§		CHAPTER 11	
IN RE:	§			
EBC WICHITA FALLS, INC.	§		CASE NO. 4:08-bk-17919	
DEBTOR,	§		(Tax Id No: 73-1585428)	
	§		CHAPTER 11	
IN RE:	§			
EBC BOISE, INC.	§		CASE NO. 4:08-bk-17920	
DEBTOR,	§		(Tax Id No: 71-0569477)	
	§		CHAPTER 11	

DEBTOR'S MOTION FOR ORDER  
DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES

TO THE HONORABLE JAMES G. NIXON, UNITED STATES BANKRUPTCY JUDGE:

COME NOW Arkansas 49, Inc., EBC Detroit, Inc., EDC Harrison, Inc., Borger Broadcasting, Inc., EBC Jacksonville, Inc., C.A.S.H. Services, Inc., EBC Kansas City, Inc., Equity News Services, Inc., EBC Los Angeles, Inc., Denver Broadcasting, Inc., EBC

Minneapolis, Inc., EBC Atlanta, Inc., EBC Nashville, Inc., EBC Panama City, Inc., EBC Buffalo, Inc., Fort Smith 46, Inc., Logan 12, Inc., Marquette Broadcasting, Inc., Nevada Channel 3, Inc., Nevada Channel 6, Inc., Newmont Broadcasting Corporation, EBC Provo, Inc., Price Broadcasting, Inc., Pullman Broadcasting, Inc., EBC Scotsbluff, Inc., Rep Plus, Inc., EBC Seattle, Inc., River City Broadcasting, Inc., EBC Southwest Florida, Inc., Roseburg Broadcasting, Inc., Tv 34, Inc., EBC Syracuse, Inc., EBC Pocatello, Inc., EBC St. Louis, Inc., EBC Waterloo, Inc., La Grande Broadcasting, Inc., Montgomery 22, Inc., Shawnee Broadcasting, Inc., EBC Waco, Inc., Vernal Broadcasting, Inc., Wyoming Channel 2, Inc., H&H Properties Limited Partnership, Woodward Broadcasting, Inc., Montana Broadcasting Group, Inc., Central Arkansas Payroll Company, Montana License Sub, Inc., Equity Broadcasting Corporation, Equity Insurance Inc., KLRA, Inc., EBC ML Vernal, Inc., EBC Wichita Falls, Inc., EBC Boise, Inc. (collectively, the "Subsidiary Debtors") and hereby move the Court for the entry of an order pursuant to 11 U.S.C. § 105(a) and Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") directing the joint administration of their respective Chapter 11 cases<sup>1</sup> (the "Motion") with Case No. 4:08-BK-17646 of Equity Media Holdings Corporation ("Equity Media"). In support of this Motion, the Subsidiary Debtors and Equity Media respectfully represent as follows:

<sup>1</sup> The Subsidiary Debtors' Case Numbers are Case Nos. 4:08-bk-17869, 4:08-bk-17870, 4:08-bk-17871, 4:08-bk-17872, 4:08-bk-17873, 4:08-bk-17874, 4:08-bk-17876, 4:08-bk-17877, 4:08-bk-17878, 4:08-bk-17879, 4:08-bk-17880, 4:08-bk-17881, 4:08-bk-17882, 4:08-bk-17883, 4:08-bk-17884, 4:08-bk-17885, 4:08-bk-17886, 4:08-bk-17887, 4:08-bk-17888, 4:08-bk-17889, 4:08-bk-17890, 4:08-bk-17891, 4:08-bk-17892, 4:08-bk-17893, 4:08-bk-17894, 4:08-bk-17895, 4:08-bk-17896, 4:08-bk-17897, 4:08-bk-17898, 4:08-bk-17899, 4:08-bk-17900, 4:08-bk-17901, 4:08-bk-17902, 4:08-bk-17903, 4:08-bk-17904, 4:08-bk-17905, 4:08-bk-17906, 4:08-bk-17907, 4:08-bk-17908, 4:08-bk-17909, 4:08-bk-17910, 4:08-bk-17911, 4:08-bk-17912, 4:08-bk-17913, 4:08-bk-17914, 4:08-bk-17915, 4:08-bk-17916, 4:08-bk-17917, 4:08-bk-17918, 4:08-bk-17919, 4:08-bk-17920, respectively.

## I. JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this Motion is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

## II. INTRODUCTION

2. On December 8, 2008 Equity Media filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").
3. On December 16, 2008, the Subsidiary Debtors filed their voluntary petitions for relief under chapter 11 of the Bankruptcy Code.
4. Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, Equity Media and the Subsidiary Debtors continue to operate their businesses and manage their properties, affairs and assets as Subsidiary Debtors-in-possession.

## III. RELIEF REQUESTED

5. By this Motion, the Subsidiary Debtors request the joint administration of their Chapter 11 cases for procedural purposes only, with Equity Media's case pursuant to 11 U.S.C. § 105(a) and Rule 1015(b) of the Bankruptcy Rules.
6. Section 105 provides that "the court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a). Bankruptcy Rule 1015(b)(4) provides that:

If a joint petition or two or more petitions are pending in the same court by or against ... a debtor and an affiliate, the court may order a joint administration of the estates.

As described above, the Subsidiary Debtors are "affiliates" of Equity Media as that term is defined in Section 101(2) of the Bankruptcy Code, because Equity Media owns 100 percent of the membership interests or shares of each Subsidiary.

7. In addition, the issues that will be addressed in these bankruptcy cases will, to some extent, be related and overlapping. Joint administration of these cases will obviate the need for duplicative notices, motions, applications, hearings, and orders, and will therefore save considerable time and expense for the Subsidiary Debtors, their estates and their investors and creditors.

8. Joint administration will not give rise to any conflict of interest among the Subsidiary Debtors' estates. The rights of the Subsidiary Debtors' respective creditors will not be adversely affected by the proposed joint administration because the Subsidiary Debtors will continue as separate and distinct legal entities and will continue to maintain separate books and records. Moreover, each creditor may file its claim against a particular estate. Each of the Subsidiary Debtors will nonetheless file separate Schedules of Assets and Liabilities and Statements of Financial Affairs.

9. The rights of all creditors will be enhanced by the reduction in costs resulting from joint administration. The Court also will be relieved of the burden of scheduling duplicative hearings, entering duplicative orders and maintaining redundant files. Finally, supervision of the administrative aspects of these chapter 11 cases by the Office of the United States Trustee will be simplified.

10. Joint administration of the above-captioned cases is in the Subsidiary Debtors' best interests, as well as those of the respective estates, creditors, and other parties in interest.

11. The Subsidiary Debtors propose that the following activities be joined for administrative purposes only:

- (a) one disclosure statement and plan of reorganization may be (but is not required to be) filed for the Subsidiary Debtors' cases by any plan proponent;
- (b) hearings in these jointly administered cases shall be joint hearings unless otherwise specified;
- (c) one consolidated docket shall be kept by the Clerk, although separate claims registers will be maintained for each of the Subsidiary Debtors' cases.

12. The Subsidiary Debtors request that the cases be jointly administered under the first filed case, which was Equity Media, Case No. 4:08-BK-17646. Accordingly, the Subsidiary Debtors respectfully request that the caption of their cases be modified to reflect the joint administration of the Chapter 11 cases as follows:

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF ARKANSAS

IN RE:	)	
EQUITY MEDIA HOLDINGS	)	CASE NO. 4:08-BK-17646
CORPORATION,	)	
ARKANSAS 49, INC. ET AL.,	)	CASE NOS. 4:08-BK-17869-17920
DEBTORS	)	
	)	JOINTLY ADMINISTERED UNDER
	)	CASE NO. 4:08-BK-17646

13. The Subsidiary Debtors also seek the Court's direction that a notation substantially similar to the following notation be entered on the docket of each of the Subsidiary Debtors' cases to reflect the joint administration of these cases:

An order has been entered in this case directing the procedural consolidation and joint administration of the Chapter 11 cases of ARKANSAS 49, INC. (Case No. 4:08-BK-17869), EBC DETROIT, INC. (Case No. 4:08-BK-17870), EBC HARISON, INC. (Case No. 4:08-BK-17871), BORGER BROADCASTING, INC. (Case No. 4:08-BK-17872), EBC JACKSONVILLE, INC. (Case No. 4:08-BK-17873), C.A.S.H. SERVICES, INC. (Case No. 4:08-BK-17874), EBC KANSAS CITY, INC. (Case No. 4:08-BK-

Texas State Bar No. 14866000  
neligan@neliganlaw.com  
James Muenker  
Texas State Bar No. 24002659  
jmunenker@neliganlaw.com  
Stephanie Martin Klein  
Texas State Bar No. 11565650  
sklein@neliganlaw.com

325 N. St. Paul, Suite 3600  
Dallas, Texas 75201  
Telephone: (214) 840-5300  
Facsimile: (214) 840-5301

JAMES F. DOWDEN, P.A.

By: /s/ James Dowden  
James Dowden  
jdowden@gmail.com

212 Center Street, Tenth Floor  
Little Rock, AR 72201  
Telephone: (501) 324-4700  
Facsimile: (501) 374-5463

PROPOSED COUNSEL FOR  
DEBTOR AND DEBTOR-IN-  
POSSESSION

#### CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served this 18<sup>th</sup> day of December, 2008 to all known creditors for each of the Debtors, any known secured or priority creditors, any party filing a Notice of Appearance, and the United States Trustee by either overnight mail, e-mail, or U.S. First Class Mail, postage prepaid.

By: /s/ Patrick J. Neligan  
Patrick J. Neligan, Jr.

Neligan for Joint Administration - Page 14  
48541 v.1

17875), EQUITY NEWS SERVICES, INC. (Case No. 4:08-BK-17876), EBC LOS ANGELES, INC. (Case No. 4:08-BK-17877), DENVER BROADCASTING, INC. (Case No. 4:08-BK-17878), EBC MINNEAPOLIS, INC. (Case No. 4:08-BK-17879), EBC ATLANTA, INC. (Case No. 4:08-BK-17880), EBC NASHVILLE, INC. (Case No. 4:08-BK-17881), EBC PANAMA CITY, INC. (Case No. 4:08-BK-17882), EBC BUFFALO, INC. (Case No. 4:08-BK-17883), FORT SMITH 46, INC. (Case No. 4:08-BK-17884), LOGAN 12, INC. (Case No. 4:08-BK-17885), MARQUETTE BROADCASTING, INC. (Case No. 4:08-BK-17886), NEVADA CHANNEL 3, INC. (Case No. 4:08-BK-17887), NEVADA CHANNEL 6, INC. (Case No. 4:08-BK-17888), NEWMONT BROADCASTING CORPORATION (Case No. 4:08-BK-17889), EBC PROVO, INC. (Case No. 4:08-BK-17890), PRICE BROADCASTING, INC. (Case No. 4:08-BK-17891), PULLMAN BROADCASTING, INC. (Case No. 4:08-BK-17892), EBC SCOTTSBLUFF, INC. (Case No. 4:08-BK-17893), REP PLUS, INC. (Case No. 4:08-BK-17894), EBC SEATTLE, INC. (Case No. 4:08-BK-17895), RIVER CITY BROADCASTING, INC. (Case No. 4:08-BK-17896), EBC SOUTHWEST FLORIDA, INC. (Case No. 4:08-BK-17897), ROSEBURG BROADCASTING, INC. (Case No. 4:08-BK-17898), TV 34, INC. (Case No. 4:08-BK-17899), EBC SYRACUSE, INC. (Case No. 4:08-BK-17900), EBC POCATELLO, INC. (Case No. 4:08-BK-17901), EBC ST. LOUIS, INC. (Case No. 4:08-BK-17902), EBC WATERLOO, INC. (Case No. 4:08-BK-17903), LA GRANDE BROADCASTING, INC. (Case No. 4:08-BK-17904), MONTGOMERY 22, INC. (Case No. 4:08-BK-17905), SHAWNEE BROADCASTING, INC. (Case No. 4:08-BK-17906), EBC WACO, INC. (Case No. 4:08-BK-17907), VERNAL BROADCASTING, INC. (Case No. 4:08-BK-17908), WYOMING CHANNEL 2, INC. (Case No. 4:08-BK-17909), WOODWARD BROADCASTING, INC. (Case No. 4:08-BK-17910), WOODWARD BROADCASTING, INC. (Case No. 4:08-BK-17911), MONTANA BROADCASTING GROUP, INC. (Case No. 4:08-BK-17912), CENTRAL ARKANSAS PAYROLL COMPANY (Case No. 4:08-BK-17913), MONTANA LICENSE SUB, INC. (Case No. 4:08-BK-17914), EQUITY BROADCASTING CORPORATION (Case No. 4:08-BK-17915), EQUITY INSURANCE INC. (Case No. 4:08-BK-17916), KLRA, INC. (Case No. 4:08-BK-17917), EBC MT. VERNON, INC. (Case No. 4:08-BK-17918), EBC WICHITA FALLS, INC. (Case No. 4:08-BK-17919), EBC BOISE, INC. (Case No. 4:08-BK-17920), and the docket in Case No. 4:08-BK-17646 (EQUITY MEDIA) should be consulted for all matters affecting these jointly administered cases.

WHEREFORE, the Subsidiary Debtors respectfully request that the Court grant the Motion, direct the joint administration of their respective Chapter 11 cases, and grant such other and further relief as is just and proper.

Dated: December 17, 2008

Respectfully submitted,

NELIGAN FOLEY LLP

By: /s/ Patrick J. Neligan  
Patrick J. Neligan, Jr.

Neligan for Joint Administration - Page 13