

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In re)	
)	
Emperor's Circle of Shen Yun)	File No. 0000154968
KQSG-LP, El Monte, CA)	
Application for Renewal of License)	
)	
)	

To: Secretary
Attn.: Chief, Media Bureau

SECOND MOTION FOR EXTENSION OF TIME

Emperor's Circle of Shen Yun ("ECSY"), licensee of KQSG-LP, El Monte, California, by its attorneys, pursuant to Section 1.46 of the Commission's Rules, 47 CFR § 1.46, submits this Second Motion for Extension of Time¹ to respond to the Informal Objection filed July 31, 2021, by Nora Hamamciyan ("NH"). In support of its Motion, ECSY submits the following:

The NH Informal Objections makes numerous allegations directed at ECSY. ECSY will demonstrate that these allegations are unfounded. However, providing the detailed information sufficient to demonstrate that these allegations are unfounded has proven to be more time consuming than originally anticipated. It is requiring a significantly greater amount of time and effort from the persons with knowledge of the matters raised. In addition, we are in the midst of the summer vacation season, and rapidly approaching the Labor Day holiday, and some of the

¹ ECSY submitted its first Motion for Extension of Time on August 11, 2021. However, the Commission's records reflect that, through an inadvertent typographical error, the Motion had the name of a different licensee throughout the document. To complete the record, ECSY is also resubmitting today a corrected copy of its first Motion for Extension of Time.

persons needed to provide the necessary information have not been available in the short time period for a response provided by the Commission's rules.² ECSY therefore requests an extension of time until August 30, 2021, to respond to the NH Informal Objection. The public interest will be served by grant of this Motion, as it will allow the development of a complete record for the Commission to act upon the Informal Objection.

Respectfully submitted,

EMPEROR'S CIRCLE OF SHEN YUN

By its Attorneys,

/s/ James L. Winston

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August 20, 2021

² ECSY notes that Section 73.3527 of the Commission's rules suggests that ECSY is not obligated to respond within the time period set by Section 1.46. Nevertheless, ECSY is submitting this motion out of an abundance of caution.

CERTIFICATE OF SERVICE

I, James Winston, do hereby certify that I sent via postal mail and electronic mail, on this 20th day of August, 2021 a copy of the foregoing SECOND MOTION FOR EXTENSION OF TIME to the following:

Nora Hamamciyan
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/s/ James L. Winston
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