

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re: Application of:)	
)	
PHILADELPHIA TELEVISION NETWORK, INC.)	File No. BALDTL – 20181120AAT
)	Facility ID: 167606
For Consent to an Involuntary Assignment)	
of License of Low Power Television Station)	
WFG-LD, Philadelphia, Pennsylvania, to)	
Joseph Bernstein, as Receiver)	
To:	Secretary	
Attention:	Video Division, Media Bureau	

MOTION FOR LEAVE TO FILE SIXTH SUPPLEMENT

Secured Judgment Creditor Newport Investment Group, LLC (“Newport”) pursuant to Section 1.41 of the Commission’s rules, 47 C.F.R. § 1.41, respectfully submits this Motion for Leave to File Sixth Supplement (“Motion for Leave”) in order to supplement the record related to Philadelphia County Court of Common Pleas’ appointment of Joseph Bernstein, duly appointed Receiver (“Receiver”) and current Licensee of the above-captioned Low Power Television broadcast station WFG-LD, Philadelphia, Pennsylvania (Facility ID No. 167606, “WFG-LD”), through Commission grant of the above-captioned Form 316 application (File No. BALDTL-20181120AAT, the “Application”) for Federal Communications Commission (“FCC”) involuntary assignment.

The purpose is to provide the Commission with important and relevant information that on February 9, 2022, Judgment Debtor Richard Howard Glanton (“Glanton”), *former* Chairman of the Board, Chief Executive Officer, President, Secretary and Treasurer of *former* WFG-LD license holder Philadelphia Television Network (“PTN”) has filed for Chapter 11 personal bankruptcy protection in the United States Bankruptcy Court for the District of New Jersey, Case No. 22-11055-CMG (“BK Case”). The relevance of Glanton’s filing of the BK Case is two-fold.

First, despite assigning his 55% majority controlling interest in PTN to Newport as valid

Judgment Creditor in two (2) State Courts and filings with the FCC in this Application and Form 316 second application (File No. BAL-20191101AAM, the “2nd Application”), Glanton now lists his 55% majority ownership shares in PTN in his Schedules and Petitions as an asset of his estate, asserting that he remains the 55% majority and controlling owner, Chairman of the Board, Chief Executive Officer, President, Secretary and Treasurer of PTN and that the FCC License is an asset of his estate in the BK Case.

Second, an automatic stay should be in effect regarding the above referenced Application (and 2nd Application) pursuant to 11 U.S. Code § 362 (“Automatic Stay”) in keeping with the Commission’s longstanding policy is that it will not, absent exceptional circumstances, renew or approve assignment or transfer of licenses when the licensee’s qualifications to hold a license are in question.¹

Additionally, this follows the FCC grant of Receiver Bernstein’s request for tolling of WEEG-LD’s construction permit (LMS File No. 0000053972) pursuant to FCC Letter Order dated August 11, 2021 by Barbara A. Kreisman, Chief, Video Division Media Bureau, tolling the entire action for “660 Days from the date of final judicial actions resolving ownership of the station” (“Tolling Grant Letter Order”).

Considering this Sixth Supplement would serve the public interest by updating the record in this proceeding that an Automatic Stay should be imposed, or in the alternative, no action should be taken on the Application or 2nd Application: a) in line with the Commissions determination in the Tolling Grant Letter Order and to wait until there is a final judicial action resolving ownership of the station; and b) honoring the Commission’s deference to judicial determinations, including bankruptcy matters, private disputes, and this matter with its genesis in the payment of a debt.²

¹ See *Jefferson Radio Co., Inc. v. FCC*, 340 F.2d 781 (D.C. Cir. 1964).

² See Commission’s November 13, 2018 Letter Order (“Letter Order”) instructing Newport to “*take the necessary steps to permit Commission action*” and expressly noted that Newport “*needed to file an FCC Form 316 sending the license to a court-appointed trustee, receiver, or debtor-in-possession.*”

Therefore, Newport requests that the Commission accept and consider the Sixth Supplement so that the Commission has a complete record in this proceeding.

Based on the matters set forth above in this Motion for Leave being considered, Newport respectfully request the Commission grant this Motion for Leave and accept and consider the Sixth Supplement filed on this same date.

Respectfully submitted,

NEWPORT INVESTMENT GROUP, LLC
SECURED JUDGMENT CREDITOR

By: 
Brian Roche
It's Manager

June 1, 2022
Newport Investment Group, LLC
2510 E. Sunset Road #5-518
Las Vegas, NV 89120
858-254-2000

Certificate of Service

The undersigned, an employee of Newport Investment Group, LLC., hereby certifies that a true copy of the foregoing "MOTION FOR LEAVE AND SIXTH SUPPLEMENT TO OPPOSITION TO PETITION FOR RECONSIDERATION AND TO UPDATE RECORD" was served this date, by U.S. Postal Service First Class mail, postage prepaid, or via electronic mail to those designated with an asterisk, upon the following:

Barbara Kreisman
David Brown
Hossein Hashemzadeh

Jeffrey L. Timmons, Esq.
974 Branford Lane NW
Lilburn, GA 30047-2680

Kathleen Victory, Esq.
Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street, Suite 1100
Arlington, Virginia 22209
FCC Counsel to Joseph Bernstein

By: 

June 1, 2022

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re: Application of:)	
)	
PHILADELPHIA TELEVISION NETWORK, INC.)	File No. BALDTL – 20181120AAT
)	Facility ID: 167606
For Consent to an Involuntary Assignment)	
of License of Low Power Television Station)	
WEFG-LD, Philadelphia, Pennsylvania, to)	
Joseph Bernstein, as Receiver)	
To: Secretary		
Attention: Video Division, Media Bureau		

SECURED JUDGMENT CREDITOR NEWPORT INVESTMENT GROUP, LLC’S
SIXTH SUPPLEMENT TO OPPOSITION TO PETITION FOR
RECONSIDERATION AND TO UPDATE RECORD

Secured Judgment Creditor Newport Investment Group, LLC (“Newport”) by and through the Philadelphia County Court of Common Pleas appointment of Joseph Bernstein, duly appointed Receiver (“Receiver”) and current Licensee of the above-captioned Low Power Television broadcast station WEFG-LD, Philadelphia, Pennsylvania (Facility ID No. 167606, “WEFG”), through Commission grant of the above-captioned Form 316 application (File No. BALDTL- 20181120AAT, the “Application”) for Federal Communications Commission (“FCC”) involuntary assignment, hereby respectfully submits this Sixth Supplement (“Sixth Supplement”) to Opposition to Petition for Reconsideration, and concurrently filed Motion for Leave, pursuant to Section 1.106(b) of the Commission’s Rules, 47 C.F.R. § 1.106(b). The purpose is to provide the Commission with important and relevant information that on February 9, 2022, Judgment Debtor Richard Howard Glanton (“Glanton”), *former* Chairman of the Board, Chief Executive Officer, President, Secretary and Treasurer of *former* WEFG-LD license holder Philadelphia Television Network (“PTN”) has filed for Chapter 11 personal bankruptcy protection in the United States Bankruptcy Court for the District of New Jersey, Case No. 22-11055-CMG (“BK Case”). A true and correct copy is attached hereto as

Exhibit A.

The relevance of Glanton's filing of the BK Case is two-fold. *First*, Glanton previously assigned his 55% majority controlling interest in PTN to Newport as valid Judgment Creditor in two (2) State Courts and filings and in filings with the FCC in this Application and Form 316 second application (File No. BAL-20191101AAM, the "2nd Application") representing the same. True and correct copies are attached hereto as Exhibit B. Changing his position now for the third time, Glanton now lists his 425 shares of stock in PTN representing 55% the majority and controlling shares in PTN in his Schedules and Petitions as an asset of the estate, asserting that he presently remains the 55% majority owner, Chairman of the Board, Chief Executive Officer, President, Secretary and Treasurer of PTN and that the FCC License is an asset of his estate in the BK Case. Attached hereto as Exhibit C are true and correct copies of Glanton's relevant BK Case filings, most recently the Debtor's Certification under penalty of perjury on May 17, 2022 and certified audio transcript of his 341 Creditors Exam dated March 17, 2022 attesting to the same.

Second, an automatic stay should be in effect regarding the above referenced Application, and 2nd Application pursuant to 11 U.S. Code § 362 ("Automatic Stay") in keeping with the Commission's longstanding policy is that it will not, absent exceptional circumstances, renew or approve assignment or transfer of licenses when the licensee's qualifications to hold a license are in question.¹ It is well established that a broadcast license does not confer a property right, but rather is a valuable privilege to utilize the airwaves. 47 U.S.C. § 310(d).

Additionally, this follows the FCC prior Grant of Bernstein's request for tolling of WEEG-LD's construction permit (LMS File No. 0000053972) pursuant to the FCC Letter Order dated August 11, 2021 by Barbara A. Kreisman, Chief, Video Division Media Bureau, tolling the entire action for "**660 Days from the date of final judicial actions resolving ownership of the station**"

¹ See *Jefferson Radio Co., Inc. v. FCC*, 340 F.2d 781 (D.C. Cir. 1964).

(“Tolling Grant Letter Order”). A true and correct copy of this recent Tolling Grant Letter Order is attached hereto as Exhibit D.

The Commission defers to judicial determinations in many areas, including bankruptcy matters, private disputes, and the interpretation and enforcement of contracts for the sale of a broadcast station. The Commission, in contrast, retains exclusive authority to license broadcast stations and pays deference to judicial determinations, including bankruptcy matters, private disputes, and this matter with its genesis in the payment of a debt.² Thus, the Commission has exclusive authority over a station's license.

Therefore, Newport respectfully requests the Commission refrain from acting on the Application until final judicial actions involving the ownership of the station.

Respectfully submitted,

NEWPORT INVESTMENT GROUP, LLC
SECURED JUDGMENT CREDITOR

By: _____

Brian Roche
It's Manager

June 1, 2022
Newport Investment Group, LLC
2510 E. Sunset Road #5-518
Las Vegas, NV 89120
858-254-2000

² See Commission's November 13, 2018 Letter Order (“Letter Order”) instructing Newport to “*take the necessary steps to permit Commission action*” and expressly noted that Newport “*needed to file an FCC Form 316 sending the license to a court-appointed trustee, receiver, or debtor-in-possession.*”

EXHIBIT A

Information to identify the case:

Debtor 1: Richard Howard Glanton
First Name Middle Name Last Name

Debtor 2: _____
(Spouse, if filing) First Name Middle Name Last Name

United States Bankruptcy Court: District of New Jersey

Case number: **22-11055-CMG**

Social Security number or ITIN: **xxx-xx-7618**
EIN: -- --

Social Security number or ITIN: -- --
EIN: -- --

Date case filed for chapter: **11 2/9/22**

Official Form 309E1 (For Individuals or Joint Debtors)

Notice of Chapter 11 Bankruptcy Case

10/20

For the debtors listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors and debtors, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtors or the debtors' property. For example, while the stay is in effect, creditors cannot sue, garnish wages, assert a deficiency, repossess property, or otherwise try to collect from the debtors. Creditors cannot demand repayment from debtors by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although debtors can ask the court to extend or impose a stay.

Confirmation of a chapter 11 plan may result in a discharge of debt. Creditors who assert that the debtors are not entitled to a discharge of any debts or who want to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadlines specified in this notice. (See line 10 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at <https://pacer.uscourts.gov>).

The staff of the bankruptcy clerk's office cannot give legal advice.

To help creditors correctly identify debtors, debtors submit full Social Security or Individual Taxpayer Identification Numbers, which may appear on a version of this notice. However, the full numbers must not appear on any document filed with the court.

Do not file this notice with any proof of claim or other filing in the case. Do not include more than the last four digits of a Social Security or Individual Taxpayer Identification Number in any document, including attachments, that you file with the court.

Undeliverable notices will be sent by return mail to the debtor. It is the debtor's responsibility to obtain the party's correct address, resend the returned notice, and notify this office of the party's change of address. Failure to provide all parties with a copy of this notice may adversely affect the debtor as provided by the Bankruptcy Code.

	About Debtor 1:	About Debtor 2:
1. Debtor's full name	Richard Howard Glanton	
2. All other names used in the last 8 years		
3. Address	26 Snowden Lane Princeton, NJ 08540	
4. Debtor's attorney Name and address	Thaddeus R. Maciag Maciag Law, LLC 475 Wall Street Princeton, NJ 08540	Contact phone 908-704-8800 Email: MaciagLaw1@aol.com
5. Bankruptcy clerk's office Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at https://pacer.uscourts.gov (800) 676-6856	402 East State Street Trenton, NJ 08608 Additional information may be available at the Court's Web Site: www.njb.uscourts.gov .	Hours open: 8:30 AM – 4:00 p.m., Monday – Friday (except holidays) Contact phone 609-858-9333 Date: 2/10/22

For more information, see page 2 >

Debtor **Richard Howard Glanton**

Case number **22-11055-CMG**

6. Meeting of creditors

Debtors must attend the meeting to be questioned under oath. In a joint case, both spouses must

attend.

Creditors may attend, but are not required to do so.

All individual debtors must provide picture identification and proof of social security number to the trustee at the meeting of creditors. Failure to do so may result in your case being dismissed.

March 3, 2022 at 11:00 AM

The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.

Location:

Section 341 Meeting will be conducted by telephone. Please consult the docket or contact the trustee appointed to the case for access or call-in information.

7. Deadlines

The bankruptcy clerk's office must receive these documents and any required filing fee by the following deadlines.

File by the deadline to object to discharge or to challenge whether certain debts are dischargeable:

You must file a complaint:

- if you assert that the debtor is not entitled to receive a discharge of any debts under 11 U.S.C. § 1141(d)(3) or
- if you want to have a debt excepted from discharge under 11 U.S.C. § 523(a)(2), (4), or (6).

First date set for hearing on confirmation of plan. The court will send you a notice of that date later.

Filing deadline for dischargeability complaints: 5/2/22

Deadline for filing proof of claim:

4/20/22 For a governmental unit:
8/8/22

A proof of claim is a signed statement describing a creditor's claim. A proof of claim form ("Official Form 410") may be obtained at www.uscourts.gov or any bankruptcy clerk's office. You may also contact the Clerk's Office where this case is pending to request that a Proof of Claim form be mailed to you. The Clerk's Office telephone number is included on the front of this Notice. Also, Claims can be filed electronically through the court's website at: <http://www.nib.uscourts.gov> under File An Electronic Claim.

Your claim will be allowed in the amount scheduled unless:

- your claim is designated as *disputed*, *contingent*, or *unliquidated*;
- you file a proof of claim in a different amount; or
- you receive another notice.

If your claim is not scheduled or if your claim is designated as *disputed*, *contingent*, or *unliquidated*, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.

You may review the schedules at the bankruptcy clerk's office or online at <https://pacer.uscourts.gov>.

Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.

Deadline to object to exemptions:

The law permits debtors to keep certain property as exempt. If you believe that the law does not authorize an exemption claimed, you may file an objection.

Filing Deadline:

30 days after the *conclusion* of the meeting of creditors

8. Creditors with a foreign address

If you are a creditor receiving mailed notice at a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.

9. Filing a Chapter 11 bankruptcy case

Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate the debtor's business.

10. Discharge of debts

Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of a debt. See 11 U.S.C. § 1141(d). However, unless the court orders otherwise, the debts will not be discharged until all payments under the plan are made. A discharge means that creditors may never try to collect the debt from the debtors personally except as provided in the plan. If you believe that a particular debt owed to you should be excepted from the discharge under 11 U.S.C. § 523 (a)(2), (4), or (6), you must file a complaint and pay the filing fee in the bankruptcy clerk's office by the deadline. If you believe that the debtors are not entitled to a discharge of any of their debts under 11 U.S.C. § 1141 (d)(3), you must file a complaint and pay the filing fee in the clerk's office by the first date set for the hearing on confirmation of the plan. The court will send you another notice telling you of that date.

**WRITING A LETTER TO THE COURT OR THE JUDGE IS NOT A SUBSTITUTE FOR FILING AN
ADVERSARY COMPLAINT OBJECTING TO DISCHARGE OR DISCHARGEABILITY. IN NO
CIRCUMSTANCE WILL WRITING A LETTER PROTECT YOUR RIGHTS.**

11. Exempt property

The law allows debtors to keep certain property as exempt. Fully exempt property will not be sold and distributed to creditors, even if the case is converted to chapter 7. Debtors must file a list of property claimed as exempt. You may inspect that list at the bankruptcy clerk's office or online at <https://pacer.uscourts.gov>. If you believe that the law does not authorize an exemption that the debtors claim, you may file an objection. The bankruptcy clerk's office must receive the objection by the deadline to object to exemptions in line 7.

Information to identify the case:

Debtor 1:	Richard Howard Glanton	Social Security number or ITIN:	xxx-xx-7618
	First Name Middle Name Last Name	EIN:	-- --
Debtor 2:		Social Security number or ITIN:	----
(Spouse, if filing)	First Name Middle Name Last Name	EIN:	-- --
United States Bankruptcy Court:	District of New Jersey	Date case filed for chapter:	11 2/9/22
Case number:	22-11055-CMG		

Official Form 309E1 (For Individuals or Joint Debtors)

Notice of Chapter 11 Bankruptcy Case

10/20

For the debtors listed above, a case has been filed under chapter 11 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors and debtors, including information about the meeting of creditors and deadlines. Read both pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtors or the debtors' property. For example, while the stay is in effect, creditors cannot sue, garnish wages, assert a deficiency, repossess property, or otherwise try to collect from the debtors. Creditors cannot demand repayment from debtors by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although debtors can ask the court to extend or impose a stay.

Confirmation of a chapter 11 plan may result in a discharge of debt. Creditors who assert that the debtors are not entitled to a discharge of any debts or who want to have a particular debt excepted from discharge may be required to file a complaint in the bankruptcy clerk's office within the deadlines specified in this notice. (See line 10 below for more information.)

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at <https://pacer.uscourts.gov>).

The staff of the bankruptcy clerk's office cannot give legal advice.

To help creditors correctly identify debtors, debtors submit full Social Security or Individual Taxpayer Identification Numbers, which may appear on a version of this notice. However, the full numbers must not appear on any document filed with the court.

Do not file this notice with any proof of claim or other filing in the case. Do not include more than the last four digits of a Social Security or Individual Taxpayer Identification Number in any document, including attachments, that you file with the court.

Undeliverable notices will be sent by return mail to the debtor. It is the debtor's responsibility to obtain the party's correct address, resend the returned notice, and notify this office of the party's change of address. Failure to provide all parties with a copy of this notice may adversely affect the debtor as provided by the Bankruptcy Code.

	About Debtor 1:	About Debtor 2:
1. Debtor's full name	Richard Howard Glanton	
2. All other names used in the last 8 years		
3. Address	26 Snowden Lane Princeton, NJ 08540	
4. Debtor's attorney Name and address	Thaddeus R. Maciag Maciag Law, LLC 475 Wall Street Princeton, NJ 08540	Contact phone 908-704-8800 Email: MaciagLaw1@aol.com
5. Bankruptcy clerk's office Documents in this case may be filed at this address. You may inspect all records filed in this case at this office or online at https://pacer.uscourts.gov (800) 676-6856	402 East State Street Trenton, NJ 08608 Additional information may be available at the Court's Web Site: www.njb.uscourts.gov .	Hours open: 8:30 AM – 4:00 p.m., Monday – Friday (except holidays) Contact phone 609-858-9333 Date: 2/10/22

For more information, see page 2 >

Debtor **Richard Howard Glanton**

Case number **22-11055-CMG**

6. Meeting of creditors

Debtors must attend the meeting to be questioned under oath. In a joint case, both spouses must

attend.

Creditors may attend, but are not required to do so.

All individual debtors must provide picture identification and proof of social security number to the trustee at the meeting of creditors. Failure to do so may result in your case being dismissed.

March 3, 2022 at 11:00 AM

The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.

Location:

Section 341 Meeting will be conducted by telephone. Please consult the docket or contact the trustee appointed to the case for access or call-in information.

7. Deadlines

The bankruptcy clerk's office must receive these documents and any required filing fee by the following deadlines.

File by the deadline to object to discharge or to challenge whether certain debts are dischargeable:

You must file a complaint:

- if you assert that the debtor is not entitled to receive a discharge of any debts under 11 U.S.C. § 1141(d)(3) or
- if you want to have a debt excepted from discharge under 11 U.S.C. § 523(a)(2), (4), or (6).

First date set for hearing on confirmation of plan. The court will send you a notice of that date later.

Filing deadline for dischargeability complaints: 5/2/22

Deadline for filing proof of claim:

4/20/22 For a governmental unit:
8/8/22

A proof of claim is a signed statement describing a creditor's claim. A proof of claim form ("Official Form 410") may be obtained at www.uscourts.gov or any bankruptcy clerk's office. You may also contact the Clerk's Office where this case is pending to request that a Proof of Claim form be mailed to you. The Clerk's Office telephone number is included on the front of this Notice. Also, Claims can be filed electronically through the court's website at: <http://www.nib.uscourts.gov> under File An Electronic Claim.

Your claim will be allowed in the amount scheduled unless:

- your claim is designated as *disputed*, *contingent*, or *unliquidated*;
- you file a proof of claim in a different amount; or
- you receive another notice.

If your claim is not scheduled or if your claim is designated as *disputed*, *contingent*, or *unliquidated*, you must file a proof of claim or you might not be paid on your claim and you might be unable to vote on a plan. You may file a proof of claim even if your claim is scheduled.

You may review the schedules at the bankruptcy clerk's office or online at <https://pacer.uscourts.gov>.

Secured creditors retain rights in their collateral regardless of whether they file a proof of claim. Filing a proof of claim submits a creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a proof of claim may surrender important nonmonetary rights, including the right to a jury trial.

Deadline to object to exemptions:

The law permits debtors to keep certain property as exempt. If you believe that the law does not authorize an exemption claimed, you may file an objection.

Filing Deadline:

30 days after the *conclusion* of the meeting of creditors

8. Creditors with a foreign address

If you are a creditor receiving mailed notice at a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.

9. Filing a Chapter 11 bankruptcy case

Chapter 11 allows debtors to reorganize or liquidate according to a plan. A plan is not effective unless the court confirms it. You may receive a copy of the plan and a disclosure statement telling you about the plan, and you may have the opportunity to vote on the plan. You will receive notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the property and may continue to operate the debtor's business.

10. Discharge of debts

Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of a debt. See 11 U.S.C. § 1141(d). However, unless the court orders otherwise, the debts will not be discharged until all payments under the plan are made. A discharge means that creditors may never try to collect the debt from the debtors personally except as provided in the plan. If you believe that a particular debt owed to you should be excepted from the discharge under 11 U.S.C. § 523 (a)(2), (4), or (6), you must file a complaint and pay the filing fee in the bankruptcy clerk's office by the deadline. If you believe that the debtors are not entitled to a discharge of any of their debts under 11 U.S.C. § 1141 (d)(3), you must file a complaint and pay the filing fee in the clerk's office by the first date set for the hearing on confirmation of the plan. The court will send you another notice telling you of that date.

**WRITING A LETTER TO THE COURT OR THE JUDGE IS NOT A SUBSTITUTE FOR FILING AN
ADVERSARY COMPLAINT OBJECTING TO DISCHARGE OR DISCHARGEABILITY. IN NO
CIRCUMSTANCE WILL WRITING A LETTER PROTECT YOUR RIGHTS.**

11. Exempt property

The law allows debtors to keep certain property as exempt. Fully exempt property will not be sold and distributed to creditors, even if the case is converted to chapter 7. Debtors must file a list of property claimed as exempt. You may inspect that list at the bankruptcy clerk's office or online at <https://pacer.uscourts.gov>. If you believe that the law does not authorize an exemption that the debtors claim, you may file an objection. The bankruptcy clerk's office must receive the objection by the deadline to object to exemptions in line 7.

Fill in this information to identify your case:

United States Bankruptcy Court for the:

DISTRICT OF NEW JERSEY

Case number (if known)

Chapter you are filing under:

☐ Chapter 7

☒ Chapter 11

☐ Chapter 12

☐ Chapter 13

☐ Check if this is an amended filing

Official Form 101

Voluntary Petition for Individuals Filing for Bankruptcy

04/20

The bankruptcy forms use *you* and *Debtor 1* to refer to a debtor filing alone. A married couple may file a bankruptcy case together—called a *joint case*—and in joint cases, these forms use *you* to ask for information from both debtors. For example, if a form asks, “Do you own a car,” the answer would be yes if either debtor owns a car. When information is needed about the spouses separately, the form uses *Debtor 1* and *Debtor 2* to distinguish between them. In joint cases, one of the spouses must report information as *Debtor 1* and the other as *Debtor 2*. The same person must be *Debtor 1* in all of the forms.

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Identify Yourself

About Debtor 1:

About Debtor 2 (Spouse Only in a Joint Case):

1. Your full name

Write the name that is on your government-issued picture identification (for example, your driver's license or passport).

Bring your picture identification to your meeting with the trustee.

Richard

First name

Howard

Middle name

Glanton

Last name and Suffix (Sr., Jr., II, III)

First name

Middle name

Last name and Suffix (Sr., Jr., II, III)

2. All other names you have used in the last 8 years

Include your married or maiden names.

3. Only the last 4 digits of your Social Security number or federal Individual Taxpayer Identification number (ITIN)

xxx-xx-7618

Debtor 1 **Richard Howard Glanton**

Case number (if known)

About Debtor 1:

About Debtor 2 (Spouse Only in a Joint Case):

4. Any business names and Employer Identification Numbers (EIN) you have used in the last 8 years

☒ I have not used any business name or EINs.

☐ I have not used any business name or EINs.

Include trade names and *doing business as* names

Business name(s)

Business name(s)

EIN

EIN

5. Where you live

**26 Snowden Lane
Princeton, NJ 08540**

Number, Street, City, State & ZIP Code

Mercer

County

If your mailing address is different from the one above, fill it in here. Note that the court will send any notices to you at this mailing address.

Number, P.O. Box, Street, City, State & ZIP Code

If Debtor 2 lives at a different address:

Number, Street, City, State & ZIP Code

County

If Debtor 2's mailing address is different from yours, fill it in here. Note that the court will send any notices to this mailing address.

Number, P.O. Box, Street, City, State & ZIP Code

6. Why you are choosing this district to file for bankruptcy

Check one:

☒ Over the last 180 days before filing this petition, I have lived in this district longer than in any other district.

☐ I have another reason.
Explain. (See 28 U.S.C. § 1408.)

Check one:

☐ Over the last 180 days before filing this petition, I have lived in this district longer than in any other district.

☐ I have another reason.
Explain. (See 28 U.S.C. § 1408.)

Debtor 1 Richard Howard Glanton

Case number (if known) _____

Part 2: Tell the Court About Your Bankruptcy Case

7. **The chapter of the Bankruptcy Code you are choosing to file under** *Check one.* (For a brief description of each, see *Notice Required by 11 U.S.C. § 342(b) for Individuals Filing for Bankruptcy (Form 2010)*). Also, go to the top of page 1 and check the appropriate box.
- ☐ Chapter 7
- ☒ Chapter 11
- ☐ Chapter 12
- ☐ Chapter 13
-
8. **How you will pay the fee** ☒ **I will pay the entire fee when I file my petition.** Please check with the clerk's office in your local court for more details about how you may pay. Typically, if you are paying the fee yourself, you may pay with cash, cashier's check, or money order. If your attorney is submitting your payment on your behalf, your attorney may pay with a credit card or check with a pre-printed address.
- ☐ **I need to pay the fee in installments.** If you choose this option, sign and attach the *Application for Individuals to Pay The Filing Fee in Installments* (Official Form 103A).
- ☐ **I request that my fee be waived** (You may request this option only if you are filing for Chapter 7. By law, a judge may, but is not required to, waive your fee, and may do so only if your income is less than 150% of the official poverty line that applies to your family size and you are unable to pay the fee in installments). If you choose this option, you must fill out the *Application to Have the Chapter 7 Filing Fee Waived* (Official Form 103B) and file it with your petition.
-
9. **Have you filed for bankruptcy within the last 8 years?** ☐ No.
- ☒ Yes.
- | | | | | | |
|----------|------------|------|----------------|-------------|---------------------|
| District | <u>DNJ</u> | When | <u>7/13/17</u> | Case number | <u>17-24279-CMG</u> |
| District | _____ | When | _____ | Case number | _____ |
| District | _____ | When | _____ | Case number | _____ |
-
10. **Are any bankruptcy cases pending or being filed by a spouse who is not filing this case with you, or by a business partner, or by an affiliate?** ☒ No
- ☐ Yes.
- | | | | |
|-----------------------|-------|---------------------|-------|
| Debtor | _____ | Relationship to you | _____ |
| District | _____ | When | _____ |
| Case number, if known | _____ | | |
| Debtor | _____ | Relationship to you | _____ |
| District | _____ | When | _____ |
| Case number, if known | _____ | | |
-
11. **Do you rent your residence?** ☒ No. Go to line 12.
- ☐ Yes. Has your landlord obtained an eviction judgment against you?
- ☐ No. Go to line 12.
- ☐ Yes. Fill out *Initial Statement About an Eviction Judgment Against You* (Form 101A) and file it as part of this bankruptcy petition.

Debtor 1 **Richard Howard Glanton**

Case number (if known)

Part 3: Report About Any Businesses You Own as a Sole Proprietor**12. Are you a sole proprietor of any full- or part-time business?**☒ No. Go to Part 4.☐ Yes. Name and location of business

A sole proprietorship is a business you operate as an individual, and is not a separate legal entity such as a corporation, partnership, or LLC.

If you have more than one sole proprietorship, use a separate sheet and attach it to this petition.

Name of business, if any

Number, Street, City, State & ZIP Code

Check the appropriate box to describe your business:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ None of the above

13. Are you filing under Chapter 11 of the Bankruptcy Code, and are you a small business debtor or a debtor as defined by 11 U.S.C. § 1182(1)?

For a definition of *small business debtor*, see 11 U.S.C. § 101(51D).

If you are filing under Chapter 11, the court must know whether you are a small business debtor or a debtor choosing to proceed under Subchapter V so that it can set appropriate deadlines. If you indicate that you are a small business debtor or you are choosing to proceed under Subchapter V, you must attach your most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).

☐ No. I am not filing under Chapter 11.☒ No. I am filing under Chapter 11, but I am NOT a small business debtor according to the definition in the Bankruptcy Code.☐ Yes. I am filing under Chapter 11, I am a small business debtor according to the definition in the Bankruptcy Code, and I do not choose to proceed under Subchapter V of Chapter 11.☐ Yes. I am filing under Chapter 11, I am a debtor according to the definition in § 1182(1) of the Bankruptcy Code, and I choose to proceed under Subchapter V of Chapter 11.**Part 4: Report if You Own or Have Any Hazardous Property or Any Property That Needs Immediate Attention****14. Do you own or have any property that poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety? Or do you own any property that needs immediate attention?**☒ No.☐ Yes. What is the hazard?

If immediate attention is needed, why is it needed?

For example, do you own perishable goods, or livestock that must be fed, or a building that needs urgent repairs?

Where is the property?

Number, Street, City, State & Zip Code

Debtor 1 **Richard Howard Glanton**

Case number (if known)

Part 5: Explain Your Efforts to Receive a Briefing About Credit Counseling**15. Tell the court whether you have received a briefing about credit counseling.**

The law requires that you receive a briefing about credit counseling before you file for bankruptcy. You must truthfully check one of the following choices. If you cannot do so, you are not eligible to file.

If you file anyway, the court can dismiss your case, you will lose whatever filing fee you paid, and your creditors can begin collection activities again.

About Debtor 1:

You must check one:

- ☒ **I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, and I received a certificate of completion.**

Attach a copy of the certificate and the payment plan, if any, that you developed with the agency.

- ☐ **I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, but I do not have a certificate of completion.**

Within 14 days after you file this bankruptcy petition, you **MUST** file a copy of the certificate and payment plan, if any.

- ☐ **I certify that I asked for credit counseling services from an approved agency, but was unable to obtain those services during the 7 days after I made my request, and exigent circumstances merit a 30-day temporary waiver of the requirement.**

To ask for a 30-day temporary waiver of the requirement, attach a separate sheet explaining what efforts you made to obtain the briefing, why you were unable to obtain it before you filed for bankruptcy, and what exigent circumstances required you to file this case.

Your case may be dismissed if the court is dissatisfied with your reasons for not receiving a briefing before you filed for bankruptcy. If the court is satisfied with your reasons, you must still receive a briefing within 30 days after you file. You must file a certificate from the approved agency, along with a copy of the payment plan you developed, if any. If you do not do so, your case may be dismissed.

Any extension of the 30-day deadline is granted only for cause and is limited to a maximum of 15 days.

- ☐ **I am not required to receive a briefing about credit counseling because of:**

- ☐ **Incapacity.**
I have a mental illness or a mental deficiency that makes me incapable of realizing or making rational decisions about finances.
- ☐ **Disability.**
My physical disability causes me to be unable to participate in a briefing in person, by phone, or through the internet, even after I reasonably tried to do so.
- ☐ **Active duty.**
I am currently on active military duty in a military combat zone.

If you believe you are not required to receive a briefing about credit counseling, you must file a motion for waiver credit counseling with the court.

About Debtor 2 (Spouse Only in a Joint Case):

You must check one:

- ☐ **I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, and I received a certificate of completion.**

Attach a copy of the certificate and the payment plan, if any, that you developed with the agency.

- ☐ **I received a briefing from an approved credit counseling agency within the 180 days before I filed this bankruptcy petition, but I do not have a certificate of completion.**

Within 14 days after you file this bankruptcy petition, you **MUST** file a copy of the certificate and payment plan, if any.

- ☐ **I certify that I asked for credit counseling services from an approved agency, but was unable to obtain those services during the 7 days after I made my request, and exigent circumstances merit a 30-day temporary waiver of the requirement.**

To ask for a 30-day temporary waiver of the requirement, attach a separate sheet explaining what efforts you made to obtain the briefing, why you were unable to obtain it before you filed for bankruptcy, and what exigent circumstances required you to file this case.

Your case may be dismissed if the court is dissatisfied with your reasons for not receiving a briefing before you filed for bankruptcy.

If the court is satisfied with your reasons, you must still receive a briefing within 30 days after you file. You must file a certificate from the approved agency, along with a copy of the payment plan you developed, if any. If you do not do so, your case may be dismissed.

Any extension of the 30-day deadline is granted only for cause and is limited to a maximum of 15 days.

- ☐ **I am not required to receive a briefing about credit counseling because of:**

- ☐ **Incapacity.**
I have a mental illness or a mental deficiency that makes me incapable of realizing or making rational decisions about finances.
- ☐ **Disability.**
My physical disability causes me to be unable to participate in a briefing in person, by phone, or through the internet, even after I reasonably tried to do so.
- ☐ **Active duty.**
I am currently on active military duty in a military combat zone.

If you believe you are not required to receive a briefing about credit counseling, you must file a motion for waiver of credit counseling with the court.

Debtor 1 **Richard Howard Glanton**

Case number (if known)

Part 6: Answer These Questions for Reporting Purposes

16. What kind of debts do you have?	16a.	Are your debts primarily consumer debts? <i>Consumer debts</i> are defined in 11 U.S.C. § 101(8) as "incurred by an individual primarily for a personal, family, or household purpose." <input type="checkbox"/> No. Go to line 16b. <input checked="" type="checkbox"/> Yes. Go to line 17.
	16b.	Are your debts primarily business debts? <i>Business debts</i> are debts that you incurred to obtain money for a business or investment or through the operation of the business or investment. <input type="checkbox"/> No. Go to line 16c. <input type="checkbox"/> Yes. Go to line 17.
	16c.	State the type of debts you owe that are not consumer debts or business debts

17. Are you filing under Chapter 7? Do you estimate that after any exempt property is excluded and administrative expenses are paid that funds will be available for distribution to unsecured creditors?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.	I am not filing under Chapter 7. Go to line 18. I am filing under Chapter 7. Do you estimate that after any exempt property is excluded and administrative expenses are paid that funds will be available to distribute to unsecured creditors? <input type="checkbox"/> No <input type="checkbox"/> Yes
---	--	---

18. How many Creditors do you estimate that you owe?	<input checked="" type="checkbox"/> 1-49 <input type="checkbox"/> 50-99 <input type="checkbox"/> 100-199 <input type="checkbox"/> 200-999	<input type="checkbox"/> 1,000-5,000 <input type="checkbox"/> 5001-10,000 <input type="checkbox"/> 10,001-25,000	<input type="checkbox"/> 25,001-50,000 <input type="checkbox"/> 50,001-100,000 <input type="checkbox"/> More than 100,000
---	--	--	---

19. How much do you estimate your assets to be worth?	<input type="checkbox"/> \$0 - \$50,000 <input type="checkbox"/> \$50,001 - \$100,000 <input type="checkbox"/> \$100,001 - \$500,000 <input type="checkbox"/> \$500,001 - \$1 million	<input checked="" type="checkbox"/> \$1,000,001 - \$10 million <input type="checkbox"/> \$10,000,001 - \$50 million <input type="checkbox"/> \$50,000,001 - \$100 million <input type="checkbox"/> \$100,000,001 - \$500 million	<input type="checkbox"/> \$500,000,001 - \$1 billion <input type="checkbox"/> \$1,000,000,001 - \$10 billion <input type="checkbox"/> \$10,000,000,001 - \$50 billion <input type="checkbox"/> More than \$50 billion
--	--	---	--

20. How much do you estimate your liabilities to be?	<input type="checkbox"/> \$0 - \$50,000 <input type="checkbox"/> \$50,001 - \$100,000 <input checked="" type="checkbox"/> \$100,001 - \$500,000 <input type="checkbox"/> \$500,001 - \$1 million	<input type="checkbox"/> \$1,000,001 - \$10 million <input type="checkbox"/> \$10,000,001 - \$50 million <input type="checkbox"/> \$50,000,001 - \$100 million <input type="checkbox"/> \$100,000,001 - \$500 million	<input type="checkbox"/> \$500,000,001 - \$1 billion <input type="checkbox"/> \$1,000,000,001 - \$10 billion <input type="checkbox"/> \$10,000,000,001 - \$50 billion <input type="checkbox"/> More than \$50 billion
---	---	--	--

Part 7: Sign Below

For you

I have examined this petition, and I declare under penalty of perjury that the information provided is true and correct.

If I have chosen to file under Chapter 7, I am aware that I may proceed, if eligible, under Chapter 7, 11, 12, or 13 of title 11, United States Code. I understand the relief available under each chapter, and I choose to proceed under Chapter 7.

If no attorney represents me and I did not pay or agree to pay someone who is not an attorney to help me fill out this document, I have obtained and read the notice required by 11 U.S.C. § 342(b).

I request relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I understand making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

/s/ Richard Howard Glanton

Richard Howard Glanton

Signature of Debtor 1

Richard Howard Glanton
 Signature of Debtor 2

Executed on **February 9, 2022**
 MM / DD / YYYY

Executed on _____
 MM / DD / YYYY

Debtor 1 **Richard Howard Glanton**

Case number (if known)

For your attorney, if you are represented by one

If you are not represented by an attorney, you do not need to file this page.

I, the attorney for the debtor(s) named in this petition, declare that I have informed the debtor(s) about eligibility to proceed under Chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each chapter for which the person is eligible. I also certify that I have delivered to the debtor(s) the notice required by 11 U.S.C. § 342(b) and, in a case in which § 707(b)(4)(D) applies, certify that I have no knowledge after an inquiry that the information in the schedules filed with the petition is incorrect.

/s/ Thaddeus R. Maciag, Esq.

Signature of Attorney for Debtor

Date

February 9, 2022

MM / DD / YYYY

Thaddeus R. Maciag, Esq.

Printed name

MACIAG LAW, LLC

Firm name

**475 Wall Street
Princeton, NJ 08540**

Number, Street, City, State & ZIP Code

Contact phone **908-704-8800**

Email address

Maciaglaw1@aol.com

NJ

Bar number & State

Fill in this information to identify your case:

Debtor 1 Richard Howard Glanton
 First Name Middle Name Last Name

Debtor 2
 (Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: DISTRICT OF NEW JERSEY

Case number _____
 (if known)

☐ Check if this is an amended filing

B 104

For Individual Chapter 11 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims Against You and Are Not Insiders

12/15

If you are an individual filing for bankruptcy under Chapter 11, you must fill out this form. If you are filing under Chapter 7, Chapter 12, or Chapter 13, do not fill out this form. Do not include claims by anyone who is an insider. Insiders include your relatives; any general partners; relatives of any general partners; partnerships of which you are a general partner; corporations of which you are an officer, director, person in control, or owner of 20 percent or more of their voting securities; and any managing agent, including one for a business you operate as a sole proprietor. 11 U.S.C. § 101. Also, do not include claims by secured creditors unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information.

Part 1: List the 20 Unsecured Claims in Order from Largest to Smallest. Do Not Include Claims by Insiders.

		What is the nature of the claim?	Unsecured claim
1	Celera Management Ltd. c-o Melissa Pena Esq. Norris McLaughlin 400 Crossing Blvd, 8th Flr, POBox 5933 Bridgewater, NJ 08807-5933	jointly owed to TCG and Celera	\$0.00
	<p>As of the date you file, the claim is: Check all that apply</p> <p><input checked="" type="checkbox"/> Contingent</p> <p><input type="checkbox"/> Unliquidated</p> <p><input checked="" type="checkbox"/> Disputed</p> <p><input type="checkbox"/> None of the above apply</p> <p>Does the creditor have a lien on your property?</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. Total claim (secured and unsecured)</p> <p>Value of security: -</p> <p>Unsecured claim</p>		
	Contact		
	Contact phone		
2	TCG Research Ltd c-o Melissa Pena Esq. Norris McLaughlin 400 Crossing Blvd, 8th Flr, POBox 5933 Bridgewater, NJ 08807-5933	jointly owed to Celera and TCG	\$195,657.50
	<p>As of the date you file, the claim is: Check all that apply</p> <p><input type="checkbox"/> Contingent</p> <p><input type="checkbox"/> Unliquidated</p> <p><input checked="" type="checkbox"/> Disputed</p> <p><input type="checkbox"/> None of the above apply</p> <p>Does the creditor have a lien on your property?</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Yes. Total claim (secured and unsecured)</p>		
	Contact		

Debtor 1 Richard Howard Glanton

Case number (if known) _____



Contact phone _____

Value of security: _____
Unsecured claim _____

3

Wei Wang
c-o Deanne J. Lowden Esq.
Maselli Warren
600 Alexander Rd, Suite 3-4A
Princeton, NJ 08540

What is the nature of the claim? _____

\$212,000.00

As of the date you file, the claim is: Check all that apply

- ☐ Contingent
☐ Unliquidated
☐ Disputed
☒ None of the above apply

Does the creditor have a lien on your property?

- ☒ No
☐ Yes. Total claim (secured and unsecured) _____
Value of security: _____
Unsecured claim _____

Contact _____

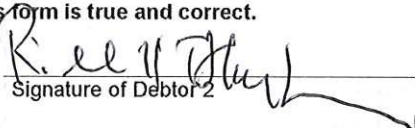
Contact phone _____

Part 2: Sign Below

Under penalty of perjury, I declare that the information provided in this form is true and correct.

X /s/ Richard Howard Glanton
Richard Howard Glanton
Signature of Debtor 1

X


Signature of Debtor 2

Date February 9, 2022

Date 2/9/2022

Fill in this information to identify your case:

Debtor 1	Richard Howard Glanton		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	DISTRICT OF NEW JERSEY		
Case number			
(if known)			

☐ Check if this is an amended filing

Official Form 106D

Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the Additional Page, fill it out, number the entries, and attach it to this form. On the top of any additional pages, write your name and case number (if known).

1. Do any creditors have claims secured by your property?

- ☒ No. Check this box and submit this form to the court with your other schedules. You have nothing else to report on this form.
- ☐ Yes. Fill in all of the information below.

Fill in this information to identify your case:

Debtor 1	Richard Howard Glanton		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the: <u>DISTRICT OF NEW JERSEY</u>			
Case number _____ (if known)			

☐ Check if this is an amended filing

Official Form 106E/F

Schedule E/F: Creditors Who Have Unsecured Claims

12/15

Be as complete and accurate as possible. Use Part 1 for creditors with PRIORITY claims and Part 2 for creditors with NONPRIORITY claims. List the other party to any executory contracts or unexpired leases that could result in a claim. Also list executory contracts on Schedule A/B: Property (Official Form 106A/B) and on Schedule G: Executory Contracts and Unexpired Leases (Official Form 106G). Do not include any creditors with partially secured claims that are listed in Schedule D: Creditors Who Have Claims Secured by Property. If more space is needed, copy the Part you need, fill it out, number the entries in the boxes on the left. Attach the Continuation Page to this page. If you have no information to report in a Part, do not file that Part. On the top of any additional pages, write your name and case number (if known).

Part 1: List All of Your PRIORITY Unsecured Claims

1. Do any creditors have priority unsecured claims against you?

- ☒ No. Go to Part 2.
☐ Yes.

Part 2: List All of Your NONPRIORITY Unsecured Claims

3. Do any creditors have nonpriority unsecured claims against you?

- ☐ No. You have nothing to report in this part. Submit this form to the court with your other schedules.
☒ Yes.

4. List all of your nonpriority unsecured claims in the alphabetical order of the creditor who holds each claim. If a creditor has more than one nonpriority unsecured claim, list the creditor separately for each claim. For each claim listed, identify what type of claim it is. Do not list claims already included in Part 1. If more than one creditor holds a particular claim, list the other creditors in Part 3. If you have more than three nonpriority unsecured claims fill out the Continuation Page of Part 2.

		Total claim	
4.1	Celera Management Ltd. Nonpriority Creditor's Name c-o Melissa Pena Esq. Norris McLaughlin 400 Crossing Blvd, 8th Flr, POBox 5933 Bridgewater, NJ 08807-5933 Number Street City State Zip Code	Last 4 digits of account number	BDNJ
		When was the debt incurred?	April 2021
	Who incurred the debt? Check one. <input type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input checked="" type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim is for a community debt Is the claim subject to offset? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	As of the date you file, the claim is: Check all that apply <input checked="" type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed Type of NONPRIORITY unsecured claim: <input type="checkbox"/> Student loans <input type="checkbox"/> Obligations arising out of a separation agreement or divorce that you did not report as priority claims <input type="checkbox"/> Debts to pension or profit-sharing plans, and other similar debts <input checked="" type="checkbox"/> Other. Specify \$195,657.50 jointly owed to TCG and Celera	Unknown

Debtor 1 **Richard Howard Glanton**

Case number (if known)

4.2

TCG Research Ltd

Nonpriority Creditor's Name

c-o Melissa Pena Esq.**Norris McLaughlin****400 Crossing Blvd, 8th Flr, POBox 5933****Bridgewater, NJ 08807-5933**

Number Street City State Zip Code

Who incurred the debt? Check one.

☐ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☒ At least one of the debtors and another☐ Check if this claim is for a community debt

Is the claim subject to offset?

☒ No☐ YesLast 4 digits of account number **BDNJ****\$195,657.50**

When was the debt incurred?

As of the date you file, the claim is: Check all that apply

☐ Contingent☐ Unliquidated☒ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify **jointly owed to Celera and TCG**

4.3

Wei Wang

Nonpriority Creditor's Name

c-o Deanne J. Lowden Esq.**Maselli Warren****600 Alexander Rd, Suite 3-4A****Princeton, NJ 08540**

Number Street City State Zip Code

Who incurred the debt? Check one.

☐ Debtor 1 only☐ Debtor 2 only☐ Debtor 1 and Debtor 2 only☒ At least one of the debtors and another☐ Check if this claim is for a community debt

Is the claim subject to offset?

☒ No☐ YesLast 4 digits of account number **8621****\$212,000.00**When was the debt incurred? **November 2021**

As of the date you file, the claim is: Check all that apply

☐ Contingent☐ Unliquidated☐ Disputed

Type of NONPRIORITY unsecured claim:

☐ Student loans☐ Obligations arising out of a separation agreement or divorce that you did not report as priority claims☐ Debts to pension or profit-sharing plans, and other similar debts☒ Other. Specify**Part 3: List Others to Be Notified About a Debt That You Already Listed**

5. Use this page only if you have others to be notified about your bankruptcy, for a debt that you already listed in Parts 1 or 2. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the original creditor in Parts 1 or 2, then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Parts 1 or 2, list the additional creditors here. If you do not have additional persons to be notified for any debts in Parts 1 or 2, do not fill out or submit this page.

Part 4: Add the Amounts for Each Type of Unsecured Claim

6. Total the amounts of certain types of unsecured claims. This information is for statistical reporting purposes only. 28 U.S.C. §159. Add the amounts for each type of unsecured claim.

Total claims from Part 1	6a. Domestic support obligations	6a.	Total Claim
		\$	0.00
	6b. Taxes and certain other debts you owe the government	6b.	Total Claim
		\$	0.00
	6c. Claims for death or personal injury while you were intoxicated	6c.	Total Claim
		\$	0.00
	6d. Other. Add all other priority unsecured claims. Write that amount here.	6d.	Total Claim
		\$	0.00
	6e. Total Priority. Add lines 6a through 6d.	6e.	Total Claim
		\$	0.00
Total	6f. Student loans	6f.	Total Claim
		\$	0.00

Debtor 1 **Richard Howard Glanton**

Case number (if known)

claims
from Part 2

6g.	Obligations arising out of a separation agreement or divorce that you did not report as priority claims	6g.	\$	0.00
6h.	Debts to pension or profit-sharing plans, and other similar debts	6h.	\$	0.00
6i.	Other. Add all other nonpriority unsecured claims. Write that amount here.	6i.	\$	407,657.50
6j.	Total Nonpriority. Add lines 6f through 6i.	6j.	\$	407,657.50

Fill in this information to identify your case:

Debtor 1 Richard Howard Glanton
First Name Middle Name Last Name

Debtor 2
(Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: DISTRICT OF NEW JERSEY

Case number
(if known) _____

☐ Check if this is an amended filing

Official Form 106Dec

Declaration About an Individual Debtor's Schedules

12/15

If two married people are filing together, both are equally responsible for supplying correct information.

You must file this form whenever you file bankruptcy schedules or amended schedules. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Sign Below

Did you pay or agree to pay someone who is NOT an attorney to help you fill out bankruptcy forms?

☒ No

☐ Yes. Name of person _____

Attach Bankruptcy Petition Preparer's Notice, Declaration, and Signature (Official Form 119)

Under penalty of perjury, I declare that I have read the summary and schedules filed with this declaration and that they are true and correct.

X /s/ Richard Howard Glanton

Richard Howard Glanton
Signature of Debtor 1

Date February 9, 2022

x

Richard H Glanton
Signature of Debtor 2

Date

2/9/2022

Fill in this information to identify your case:

Debtor 1 Richard Howard Glanton

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the: District of New Jersey

Case number
(if known)

☐ Check if this is an amended filing

Official Form 122B

Chapter 11 Statement of Your Current Monthly Income

04/20

You must file this form if you are an individual and are filing for bankruptcy under Chapter 11. If more space is needed, attach a separate sheet to this form. Include the line number to which the additional information applies. On top of any additional pages, write your name and case number (if known).

Part 1: Calculate Your Current Monthly Income

1. What is your marital and filing status? Check one only.

☐ Not married. Fill out Column A, lines 2-11.

☐ Married and your spouse is filing with you. Fill out both Columns A and B, lines 2-11.

☒ Married and your spouse is NOT filing with you. Fill out Column A, lines 2-11.

Fill in the average monthly income that you received from all sources, derived during the 6 full months before you file this bankruptcy case. 11 U.S.C. § 101(10A). For example, if you are filing on September 15, the 6-month period would be March 1 through August 31. If the amount of your monthly income varied during the 6 months, add the income for all 6 months and divide the total by 6. Fill in the result. Do not include any income amount more than once. For example, if both spouses own the same rental property, put the income from that property in one column only. If you have nothing to report for any line, write \$0 in the space.

	Column A Debtor 1	Column B Debtor 2												
2. Your gross wages, salary, tips, bonuses, overtime, and commissions (before all payroll deductions).	\$ 0.00	\$												
3. Alimony and maintenance payments. Do not include payments from a spouse if Column B is filled in.	\$ 0.00	\$												
4. All amounts from any source which are regularly paid for household expenses of you or your dependents, including child support. Include regular contributions from an unmarried partner, members of your household, your dependents, parents, and roommates. Include regular contributions from a spouse only if Column B is not filled in. Do not include payments you listed on line 3.	\$ 0.00	\$												
5. Net income from operating a business, profession, or farm	<table border="1"> <thead> <tr> <th></th> <th>Debtor 1</th> <th>Debtor 2</th> </tr> </thead> <tbody> <tr> <td>Gross receipts (before all deductions)</td> <td>\$ 21,667.00</td> <td></td> </tr> <tr> <td>Ordinary and necessary operating expenses</td> <td>-\$ 1,162.48</td> <td></td> </tr> <tr> <td>Net monthly income from a business, profession, or farm</td> <td>\$ 20,504.52</td> <td></td> </tr> </tbody> </table>		Debtor 1	Debtor 2	Gross receipts (before all deductions)	\$ 21,667.00		Ordinary and necessary operating expenses	-\$ 1,162.48		Net monthly income from a business, profession, or farm	\$ 20,504.52		Copy here -> \$ 20,504.52
	Debtor 1	Debtor 2												
Gross receipts (before all deductions)	\$ 21,667.00													
Ordinary and necessary operating expenses	-\$ 1,162.48													
Net monthly income from a business, profession, or farm	\$ 20,504.52													
6. Net income from rental and other real property	<table border="1"> <thead> <tr> <th></th> <th>Debtor 1</th> <th>Debtor 2</th> </tr> </thead> <tbody> <tr> <td>Gross receipts (before all deductions)</td> <td>\$ 0.00</td> <td></td> </tr> <tr> <td>Ordinary and necessary operating expenses</td> <td>-\$ 0.00</td> <td></td> </tr> <tr> <td>Net monthly income from rental or other real property</td> <td>\$ 0.00</td> <td></td> </tr> </tbody> </table>		Debtor 1	Debtor 2	Gross receipts (before all deductions)	\$ 0.00		Ordinary and necessary operating expenses	-\$ 0.00		Net monthly income from rental or other real property	\$ 0.00		Copy here -> \$ 0.00
	Debtor 1	Debtor 2												
Gross receipts (before all deductions)	\$ 0.00													
Ordinary and necessary operating expenses	-\$ 0.00													
Net monthly income from rental or other real property	\$ 0.00													

Debtor 1 **Richard Howard Glanton**

Case number (if known)

Column A
Debtor 1

Column B
Debtor 2

7. **Interest, dividends, and royalties**

\$ **0.00**

\$

8. **Unemployment compensation**

\$ **0.00**

\$

Do not enter the amount if you contend that the amount received was a benefit under the Social Security Act. Instead, list it here:

For you \$ **0.00**

For your spouse \$

9. **Pension or retirement income.** Do not include any amount received that was a benefit under the Social Security Act. Also, except as stated in the next sentence, do not include any compensation, pension, pay, annuity, or allowance paid by the United States Government in connection with a disability, combat-related injury or disability, or death of a member of the uniformed services. If you received any retired pay paid under chapter 61 of title 10, then include that pay only to the extent that it does not exceed the amount of retired pay to which you would otherwise be entitled if retired under any provision of title 10 other than chapter 61 of that title.

\$ **0.00**

\$

10. **Income from all other sources not listed above.** Specify the source and amount. Do not include any benefits received under the Social Security Act; payments made under the Federal law relating to the national emergency declared by the President under the National Emergencies Act (50 U.S.C. 1601 et seq.) with respect to the coronavirus disease 2019 (COVID-19); payments received as a victim of a war crime, a crime against humanity, or international or domestic terrorism; or compensation, pension, pay, annuity, or allowance paid by the United States Government in connection with a disability, combat-related injury or disability, or death of a member of the uniformed services. If necessary, list other sources on a separate page and put the total below.

\$

\$

\$ **0.00**

\$

Total amounts from separate pages, if any.

+ \$ **0.00**

\$

11. **Calculate your total current monthly income.**

Add lines 2 through 10 for each column.

Then add the total for Column A to the total for Column B.

\$ **20,504.52**

+ \$

= \$ **20,504.52**

Debtor 1 Richard Howard Glanton

Case number (if known) _____

Part 2: Sign Below

By signing here, under penalty of perjury I declare that the information on this statement and in any attachments is true and correct.

X 
Richard Howard Glanton
Signature of Debtor 1

Date February 9, 2022
MM / DD / YYYY

Notice Required by 11 U.S.C. § 342(b) for Individuals Filing for Bankruptcy (Form 2010)

This notice is for you if:

You are an individual filing for bankruptcy,
and

Your debts are primarily consumer debts.
Consumer debts are defined in 11 U.S.C.
§ 101(8) as "incurred by an individual
primarily for a personal, family, or
household purpose."

The types of bankruptcy that are available to individuals

Individuals who meet the qualifications may file under
one of four different chapters of Bankruptcy Code:

Chapter 7 - Liquidation

Chapter 11 - Reorganization

Chapter 12 - Voluntary repayment plan
for family farmers or
fishermen

Chapter 13 - Voluntary repayment plan
for individuals with regular
income

**You should have an attorney review your
decision to file for bankruptcy and the choice of
chapter.**

Chapter 7: Liquidation

\$245	filing fee
\$78	administrative fee
+	\$15 trustee surcharge
\$338	total fee

Chapter 7 is for individuals who have financial difficulty preventing them from paying their debts and who are willing to allow their non-exempt property to be used to pay their creditors. The primary purpose of filing under chapter 7 is to have your debts discharged. The bankruptcy discharge relieves you after bankruptcy from having to pay many of your pre-bankruptcy debts. Exceptions exist for particular debts, and liens on property may still be enforced after discharge. For example, a creditor may have the right to foreclose a home mortgage or repossess an automobile.

However, if the court finds that you have committed certain kinds of improper conduct described in the Bankruptcy Code, the court may deny your discharge.

You should know that even if you file chapter 7 and you receive a discharge, some debts are not discharged under the law. Therefore, you may still be responsible to pay:

most taxes;

most student loans;

domestic support and property settlement obligations;

most fines, penalties, forfeitures, and criminal restitution obligations; and

certain debts that are not listed in your bankruptcy papers.

You may also be required to pay debts arising from:

fraud or theft;

fraud or defalcation while acting in breach of fiduciary capacity;

intentional injuries that you inflicted; and

death or personal injury caused by operating a motor vehicle, vessel, or aircraft while intoxicated from alcohol or drugs.

If your debts are primarily consumer debts, the court can dismiss your chapter 7 case if it finds that you have enough income to repay creditors a certain amount. You must file *Chapter 7 Statement of Your Current Monthly Income* (Official Form 122A-1) if you are an individual filing for bankruptcy under chapter 7. This form will determine your current monthly income and compare whether your income is more than the median income that applies in your state.

If your income is not above the median for your state, you will not have to complete the other chapter 7 form, the *Chapter 7 Means Test Calculation* (Official Form 122A-2).

If your income is above the median for your state, you must file a second form—the *Chapter 7 Means Test Calculation* (Official Form 122A-2). The calculations on the form—sometimes called the *Means Test*—deduct from your income living expenses and payments on certain debts to determine any amount available to pay unsecured creditors. If

your income is more than the median income for your state of residence and family size, depending on the results of the *Means Test*, the U.S. trustee, bankruptcy administrator, or creditors can file a motion to dismiss your case under § 707(b) of the Bankruptcy Code. If a motion is filed, the court will decide if your case should be dismissed. To avoid dismissal, you may choose to proceed under another chapter of the Bankruptcy Code.

If you are an individual filing for chapter 7 bankruptcy, the trustee may sell your property to pay your debts, subject to your right to exempt the property or a portion of the proceeds from the sale of the property. The property, and the proceeds from property that your bankruptcy trustee sells or liquidates that you are entitled to, is called *exempt property*. Exemptions may enable you to keep your home, a car, clothing, and household items or to receive some of the proceeds if the property is sold.

Exemptions are not automatic. To exempt property, you must list it on *Schedule C: The Property You Claim as Exempt* (Official Form 106C). If you do not list the property, the trustee may sell it and pay all of the proceeds to your creditors.

Chapter 11: Reorganization

	\$1,167	filing fee
+	\$571	administrative fee
	\$1,738	total fee

Chapter 11 is often used for reorganizing a business, but is also available to individuals. The provisions of chapter 11 are too complicated to summarize briefly.

Read These Important Warnings

Because bankruptcy can have serious long-term financial and legal consequences, including loss of your property, you should hire an attorney and carefully consider all of your options before you file. Only an attorney can give you legal advice about what can happen as a result of filing for bankruptcy and what your options are. If you do file for bankruptcy, an attorney can help you fill out the forms properly and protect you, your family, your home, and your possessions.

Although the law allows you to represent yourself in bankruptcy court, you should understand that many people find it difficult to represent themselves successfully. The rules are technical, and a mistake or inaction may harm you. If you file without an attorney, you are still responsible for knowing and following all of the legal requirements.

You should not file for bankruptcy if you are not eligible to file or if you do not intend to file the necessary documents.

Bankruptcy fraud is a serious crime; you could be fined and imprisoned if you commit fraud in your bankruptcy case. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Chapter 12: Repayment plan for family farmers or fishermen

	\$200	filing fee
+	\$78	administrative fee
	\$278	total fee

Similar to chapter 13, chapter 12 permits family farmers and fishermen to repay their debts over a period of time using future earnings and to discharge some debts that are not paid.

Chapter 13: Repayment plan for individuals with regular income

	\$235	filing fee
+	\$78	administrative fee
	\$313	total fee

Chapter 13 is for individuals who have regular income and would like to pay all or part of their debts in installments over a period of time and to discharge some debts that are not paid. You are eligible for chapter 13 only if your debts are not more than certain dollar amounts set forth in 11 U.S.C. § 109.

Under chapter 13, you must file with the court a plan to repay your creditors all or part of the money that you owe them, usually using your future earnings. If the court approves your plan, the court will allow you to repay your debts, as adjusted by the plan, within 3 years or 5 years, depending on your income and other factors.

After you make all the payments under your plan, many of your debts are discharged. The debts that are not discharged and that you may still be responsible to pay include:

- domestic support obligations,
- most student loans,
- certain taxes,
- debts for fraud or theft,
- debts for fraud or defalcation while acting in a fiduciary capacity,
- most criminal fines and restitution obligations,
- certain debts that are not listed in your bankruptcy papers,
- certain debts for acts that caused death or personal injury, and
- certain long-term secured debts.

Warning: File Your Forms on Time

Section 521(a)(1) of the Bankruptcy Code requires that you promptly file detailed information about your creditors, assets, liabilities, income, expenses and general financial condition. The court may dismiss your bankruptcy case if you do not file this information within the deadlines set by the Bankruptcy Code, the Bankruptcy Rules, and the local rules of the court.

For more information about the documents and their deadlines, go to:
<http://www.uscourts.gov/forms/bankruptcy-forms>

Bankruptcy crimes have serious consequences

If you knowingly and fraudulently conceal assets or make a false oath or statement under penalty of perjury—either orally or in writing—in connection with a bankruptcy case, you may be fined, imprisoned, or both.

All information you supply in connection with a bankruptcy case is subject to examination by the Attorney General acting through the Office of the U.S. Trustee, the Office of the U.S. Attorney, and other offices and employees of the U.S. Department of Justice.

Make sure the court has your mailing address

The bankruptcy court sends notices to the mailing address you list on *Voluntary Petition for Individuals Filing for Bankruptcy* (Official Form 101). To ensure that you receive information about your case, Bankruptcy Rule 4002 requires that you notify the court of any changes in your address.

A married couple may file a bankruptcy case together—called a *joint case*. If you file a joint case and each spouse lists the same mailing address on the bankruptcy petition, the bankruptcy court generally will mail you and your spouse one copy of each notice, unless you file a statement with the court asking that each spouse receive separate copies.

Understand which services you could receive from credit counseling agencies

The law generally requires that you receive a credit counseling briefing from an approved credit counseling agency. 11 U.S.C. § 109(h). If you are filing a joint case, both spouses must receive the briefing. With limited exceptions, you must receive it within the 180 days **before** you file your bankruptcy petition. This briefing is usually conducted by telephone or on the Internet.

In addition, after filing a bankruptcy case, you generally must complete a financial management instructional course before you can receive a discharge. If you are filing a joint case, both spouses must complete the course.

You can obtain the list of agencies approved to provide both the briefing and the instructional course from:
<http://www.uscourts.gov/services-forms/bankruptcy/credit-counseling-and-debtor-education-courses>.

In Alabama and North Carolina, go to:
<http://www.uscourts.gov/services-forms/bankruptcy/credit-counseling-and-debtor-education-courses>.

If you do not have access to a computer, the clerk of the bankruptcy court may be able to help you obtain the list.

**United States Bankruptcy Court
District of New Jersey**

In re Richard Howard Glanton

Debtor(s)

Case No.

Chapter

11

VERIFICATION OF CREDITOR MATRIX

The above-named Debtor hereby verifies that the attached list of creditors is true and correct to the best of his/her knowledge.

Date: February 9, 2022

/s/ Richard Howard Glanton
Richard Howard Glanton
Signature of Debtor



Celera Management Ltd.
c-o Melissa Pena Esq.
Norris McLaughlin
400 Crossing Blvd, 8th Flr, POBox 5933
Bridgewater, NJ 08807-5933

Eileen Glanton
26 Snowden Lane
Princeton, NJ 08540

ElectedFace Inc.
26 Snowden Lane
Princeton, NJ 08540

ElectedFace Inc.
26 Snowden Lane
Princeton, NJ 08540

ElectedFace Inc.
26 Snowden Lane
Princeton, NJ 08540

TCG Research Ltd
c-o Melissa Pena Esq.
Norris McLaughlin
400 Crossing Blvd, 8th Flr, POBox 5933
Bridgewater, NJ 08807-5933

Wei Wang
c-o Deanne J. Lowden Esq.
Maselli Warren
600 Alexander Rd, Suite 3-4A
Princeton, NJ 08540

B2030 (Form 2030) (12/15)

**United States Bankruptcy Court
District of New Jersey**

In re **Richard Howard Glanton**

Debtor(s)

Case No.

Chapter

11

DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept	\$ as approved on Applications to the Court
Prior to the filing of this statement I have received	\$ 2,000.00
Balance Due	\$ as approved on Applications to the Court

2. The source of the compensation paid to me was:

☐ Debtor ☒ Other (specify): **Eileen Candia Glanton**

3. The source of compensation to be paid to me is:

☒ Debtor ☒ Other (specify): **Future compensation to be paid by the Debtor, upon Court Approval of Applications for Compensation or monthly fee statements, as applicable**

4. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

☐ I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.

5. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:

- a. Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
- b. Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
- c. Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
- d. [Other provisions as needed]

Application for Retention on a general retainer, on an hourly basis, with compensation to be paid per Applications for Compensation and Monthly Fee Statements to be filed with the Court in the ordinary course.

6. By agreement with the debtor(s), the above-disclosed fee does not include the following service:

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

February 9, 2022

Date

/s/ Thaddeus R. Maciag, Esq.

Thaddeus R. Maciag, Esq.

Signature of Attorney

MACIAG LAW, LLC

475 Wall Street

Princeton, NJ 08540

908-704-8800

Maciaglaw1@aol.com

Name of law firm

EXHIBIT B

FCC 345

**APPLICATION FOR TRANSFER OF
CONTROL OF A CORPORATE LICENSEE
OR PERMITTEE, OR FOR ASSIGNMENT OF
LICENSE OR PERMIT OF TV OR FM
TRANSLATOR STATION OR LOW POWER
TELEVISION STATION**

Read INSTRUCTIONS Before Filling Out Form

FOR COMMISSION USE ONLY
FILE NO.

BALDTL - 20180502ACB

Section I - General Information

1.	Legal Name of the Licensee/Permittee PHILADELPHIA TELEVISION NETWORK, INC.		
	Mailing Address 26 SNOWDEN LANE		
	City PRINCETON	State or Country (if foreign address) NJ	ZIP Code 08540 -
	Telephone Number (include area code) 2155194654		E-Mail Address (if available) RICHARDHGLANTON@ICLOUD.COM
	FCC Registration Number: 0007622624	Call Sign WEFG-LD	Facility Identifier 167606
2.	Contact Representative (if other than Licensee/Permittee) PHILADELPHIA TELEVISION NETWORK, INC.		Firm or Company Name
	Mailing Address 26 SNOWDEN LANE		
	City PRINCETON	State or Country (if foreign address) NJ	ZIP Code 08540 -
	Telephone Number (include area code) 2155194654		E-Mail Address (if available) RICHARDHGLANTON@ICLOUD.COM
3.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial Educational Licensee/Permittee <input type="radio"/> Other <input checked="" type="radio"/> N/A (Fee Required)		
4.	Were any of the authorizations that are the subject of this application obtained <input type="radio"/> Yes <input checked="" type="radio"/> No		

through the Commission's competitive bidding procedures (see 47 C.F.R. Sections 1.2111(a) and 73.5001)?

[Exhibit 1]

If Yes, list pertinent authorizations in an Exhibit.

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Assignor/Transferor

1. **Certification.** Licensee/permittee certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Licensee further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets. ☒ Yes ☐ No

2. Application for (check only one box for A and B):

A. ☐ Consent to Assignment of Construction Permit ☐ Consent to Transfer Control of Permittee

☒ Consent to Assignment of License ☐ Consent to Transfer Control of Licensee

☐ Amendment to pending application

If an amendment, **submit as an Exhibit** a listing by [Exhibit 2]
Section and Question Number of the portions of the
pending application that are being revised.

B. ☐ TV Translator ☐ Low Power TV Station ☐ FM Translator ☒ Digital Low Power TV ☐
Digital TV Translator

3. Legal Name of the Assignor/Transferor
PHILADELPHIA TELEVISION NETWORK, INC.

Mailing Address
26 SNOWDEN LANE

City PRINCETON	State or Country (if foreign address) NJ	Zip Code 08540 -
Telephone Number (include area code) 2155194654	E-Mail Address (if available) RICHARDHGLANTON@ICLOUD.COM	

If more than one transferor, submit the information requested in question 1 for each transferor.

[Exhibit 3]

4. Contact Representative (if other than assignee) Firm or Company Name

Mailing Address

City	State or Country (if foreign address)	Zip Code
Telephone Number (include area code)	E-Mail Address (if available)	

5. **Authorizations to be Assigned/Transferred.** List call signs, locations and facility identifiers of all authorizations to be assigned/transferred. Include construction permits and file numbers. List main station authorizations and any FM and/or TV translator stations, LPTV stations, SCA, FM and/or TV booster stations, and associated auxiliary service stations.

[Enter Station Information]

List the authorized stations and construction permits to be assigned/transferred. Provide the Facility Identification Number and the Call Sign, or the Facility Identification Number and the File Number of the Construction Permit, and the location, for each station to be assigned/transferred. Include main stations, FM and/or TV translator stations, LPTV stations, FM and/or TV booster stations.

Facility ID Number	Call Sign	or Construction Permit File Number	City	State
167606	WEFG-LD	-	PHILADELPHIA	PA

6.	Agreements for Sale/Transfer of Station. Licensee/permittee certifies that: a. it has placed in its station records and submitted to the Commission as an Exhibit to this application copies of all agreements for the sale/transfer of the station(s); b. these documents embody the complete and final understanding between licensee/permittee and assignee/transferee; and c. these agreements comply fully with the Commission's rules and policies.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 4]
----	---	---

7.	Character Issues. Licensee/permittee certifies that neither licensee/permittee nor any party to the application has or has had any interest in or connection with: a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the a application; or b. any pending broadcast application in which character issues have been raised.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 5]
----	--	---

8.	Adverse Findings. Licensee/permittee certifies that, with respect to the licensee/permittee and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 6]
----	--	---

9.	Local Public Notice. Licensee/permittee certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.	<input checked="" type="radio"/> Yes <input type="radio"/> No
----	---	---

10.	Auction Authorization. Licensee/permittee certifies that more than five years have passed since the issuance of the construction permit for the station being assigned/transferred, where that permit was acquired in an auction through the use of a bidding credit or other special measure.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A See Explanation in [Exhibit 7]
11.	Anti-Drug Abuse Act Certification. Licensee/permittee certifies that neither licensee/permittee nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No
12.	Anti-Discrimination Certification. Licensee/permittee certifies that neither licensee/permittee nor any party to the application have violated the Commission's prohibition against discrimination on the basis of race, color, religion, national origin or sex in the sale of commercially operated FM translator, TV translator, or low power television stations.	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 8]

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing RICHARD H. GLANTON	Typed or Printed Title of Person Signing CHAIRMAN & CEO
Signature	Date 05/02/2018

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section III - Assignee/Transferee

1.	Certification. Assignee/transferee certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Assignee/transferee further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets.	<input checked="" type="radio"/> Yes <input type="radio"/> No
2.	Legal Name of the Assignee/Transferee	

NEWPORT INVESTMENT GROUP, LLC		
Mailing Address 2620 S. MARYLAND PKWY STE 14-136		
City LAS VEGAS	State or Country (if foreign address) NV	Zip Code 89109 -
Telephone Number (include area code) 8582542000		E-Mail Address (if available) BR@ROCHECORP.COM
If more than one transferee, submit the information requested in question 1 for each transferor. [Exhibit 9]		
3.		
Contact Representative (if other than assignee) MELODIE A. VIRTUE, ESQ.		Firm or Company Name GARVEY SCHUBERT BARER
Mailing Address 1000 POTOMAC STREET, N.W. SUITE 200		
City WASHINGTON	State or Country (if foreign address) DC	Zip Code 20007 - 3501
Telephone Number (include area code) 2029657880		E-Mail Address (if available) MVIRTUE@GSBLAW.COM
4.		
Nature of Applicant. Assignee/transferee is: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div> <input type="radio"/> an individual </div> <div> <input type="radio"/> a general partnership </div> <div> <input type="radio"/> a for-profit corporation </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div> <input type="radio"/> a limited partnership </div> <div> <input type="radio"/> a not-for-profit corporation </div> <div> <input checked="" type="radio"/> a limited liability company (LLC/LC) </div> </div> <div style="margin-top: 10px;"> <input type="radio"/> other </div>		
a. If "other", describe nature of applicant in an Exhibit.		[Exhibit 10]
5.		
Agreements for Sale/Transfer of Station. Assignee/Transferee certifies that: <input checked="" type="radio"/> Yes <input type="radio"/> No		
a. the written agreements in the licensee/permittee's station records embody the complete and final agreement for the sale of the station(s) which are to be assigned; and these		See Explanation in [Exhibit 11]
b. agreements comply fully with the Commission's rules and policies.		
6.		
Character Issues. Assignee/Transferee certifies that neither assignee/transferee nor any party to the application has or has had any interest in or connection with: <input checked="" type="radio"/> Yes <input type="radio"/> No		
a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the a application; or		See Explanation in [Exhibit 12]
b. any pending broadcast application in which character issues have been raised.		

7.	Adverse Findings. Assignee/Transferee certifies that, with respect to the assignee/transferee and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 13]								
8.	Alien Ownership and Control. Assignee/Transferee certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 14]								
9.	Financial Qualifications. Assignee/Transferee certifies that sufficient net liquid assets are on hand or are available from committed sources to consummate the transaction and operate the station(s) for three months.	<input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 15]								
10.	Rebroadcast Certification. For applicants proposing translator rebroadcasts who are not the licensee of the primary station, the applicant certifies that written authority has been obtained from the licensee of the station whose programs are to be retransmitted Primary station proposed to be rebroadcast: <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <tr> <td style="width: 25%;">Facility ID Number</td> <td style="width: 25%;">Call Sign</td> <td style="width: 40%;">City</td> <td style="width: 10%;">State</td> </tr> <tr> <td style="height: 20px;"></td> <td></td> <td></td> <td></td> </tr> </table>	Facility ID Number	Call Sign	City	State					<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A
Facility ID Number	Call Sign	City	State							
11.	<p>a. Applicant certifies that it is not the licensee or permittee of the commercial primary station being rebroadcast and that neither it nor any parties to the application have any interest in or connection with the commercial primary station being rebroadcast. See 47 C.F.R. Section 74.1232(d).</p> <p>b. Applicant certifies that the FM translator's (a) 1mV/m coverage contour does not extend beyond the protected contour of the commercial FM primary station to be rebroadcast, or (b) entire 1mV/m coverage contour is contained within the greater of either: (i) the 2 mV/m daytime contour of the commercial AM primary station to be rebroadcast, or (ii) a 25-mile radius centered at the commercial AM primary station's transmitter site.</p>	<p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A See Explanation in [Exhibit 16]</p> <p><input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A See Explanation in [Exhibit 17]</p>								
<p>NOTE: If No to a. and b., and no waiver has been requested in an Exhibit, this application is unacceptable for filing. See 47 C.F.R. Section 74.1231(d).</p> <p>If No to a. and Yes to b. applicant is prohibited from receiving any support, before or after construction, either directly or indirectly from the commercial primary station being rebroadcast or from any person or entity having any interest whatsoever, or any connection with the primary FM station. Interested and connected parties include group owners, corporate parents, shareholders, officers, directors, employees, general and limited partners, family members and business associates. See 47 C.F.R. Section 74.1232(e).</p>										
12.	Applicant certifies that it is in compliance with 47 C.F.R. Section 74.1232(e),	<input type="radio"/> Yes <input type="radio"/> No								

	which prohibits a FM translator station whose coverage contour extends beyond the protected contour of the commercial FM primary station being rebroadcast, from receiving support (except for specified technical assistance), before, during, or after construction, directly or indirectly, from the primary station, or any person or entity having any interest in, or connection with, the primary station.	<input checked="" type="radio"/> N/A See Explanation in [Exhibit 18]
13.	Auction Authorization. Assignee/Transferee certifies that where less than five years have passed since the issuance of the construction permit and the permit had been acquired in an auction through the use of a bidding credit or other special measure, it would qualify for such credit or other special measure.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A See Explanation in [Exhibit 19]
14.	Anti-Drug Abuse Act Certification. Assignee/Transferee certifies that neither assignee nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.	<input checked="" type="radio"/> Yes <input type="radio"/> No
15.	Equal Employment Opportunity (EEO). If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing BRIAN ROCHE	Typed or Printed Title of Person Signing PRESIDENT
Signature	Date 05/02/2018

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 4
Description: WRITTEN AGREEMENT

THE PARTIES HAVE ENTERED INTO A STIPULATION RELATING TO A JUDGMENT ENTERED IN CONNECTION WITH THE FORECLOSURE ON ASSETS ASSIGNOR PLEDGED AS SECURITY FOR A LOAN. IN PARTIAL SATISFACTION OF THAT JUDGMENT AND DEBT, ASSIGNOR AND

ASSIGNEE HAVE AGREED, SUBJECT TO FCC APPROVAL, ON THE ASSIGNMENT TO ASSIGNEE OF STATION WFTG-LD AND OTHER ASSETS. THE STIPULATION AND THE JUDGE'S ORDER FOR THE ASSIGNMENT ARE ATTACHED.

Attachment 4

Description
Stipulation and Order

Exhibit 11

Description: WRITTEN AGREEMENT

SEE EXHIBIT 4.

Attachment 11

The Martin Law Firm, P.C.
Jason B. Martin, Esquire
Attorney ID 82767
725 Skippack Pike, Suite 337
Blue Bell, PA 19422
215-646-3980
Attorney for Plaintiff

LUXURY ASSET LENDING, LLC

Plaintiff,

v.

PHILADELPHIA TELEVISION NETWORK,
INC. et al.

Defendants

PHILADELPHIA COUNTY, PA
COURT OF COMMON PLEAS

MAY TERM, 2018

NO. 000074

CIVIL ACTION

STIPULATION FOR ISSUANCE OF ASSIGNMENT ORDER

WHEREAS, on April 6, 2017, Plaintiff LUXURY ASSET LENDING, LLC, obtained a Judgment in the Superior Court of the State of California, County of Orange, Central Justice Center, Case Number 30-2016-00880965-CU-BC-CJC, against Defendants PHILADELPHIA TELEVISION NETWORK, INC. and RICHARD H. GLANTON, in the sum of \$3,897,919.22 plus foreclosure on various assets, licenses, collateral and personal property which had been pledged as security for the underlying loans and defined herein; and

WHEREAS, on May 4, 2018 the Philadelphia County Court of Common Pleas filed, registered and entered this foreign judgment against Defendants Philadelphia Television Network, Inc. and Richard H. Glanton.

WHEREAS, Plaintiff LUXURY ASSET LENDING, LLC has assigned all right, title and interest in the Judgment herein, to NEWPORT INVESTMENT GROUP, LLC, a true and correct copy of the Assignment of Judgment and Acknowledgement of Assignment of Judgment are attached hereto as **Exhibit "A"** and incorporated herein; and

WHEREAS, NEWPORT INVESTMENT GROUP, LLC and Defendants PHILADELPHIA TELEVISION NETWORK, INC. and RICHARD H. GLANTON, have hereby agreed to have all Assets and Licenses transferred to NEWPORT INVESTMENT GROUP, LLC in partial satisfaction of the Judgment entered herein; and

WHEREAS, Defendant RICHARD H. GLANTON hereby agrees to transfer, assign, and convey to NEWPORT INVESTMENT GROUP, LLC all rights, title and interest in all shares of stock in PHILADELPHIA TELEVISION NETWORK, INC., which were issued to RICHARD H. GLANTON, whether standing in his name or beneficially held by PHILADELPHIA TELEVISION NETWORK, INC. for RICHARD H. GLANTON, the quantity of which is represented to be 425 shares of stock; and

WHEREAS, Defendants PHILADELPHIA TELEVISION NETWORK, INC. and RICHARD H. GLANTON, subject to approval by the Federal Communications Commission (“FCC”) pursuant to Section 214 of the Communications Act of 1934, Sections 63.03 and 63.04 of the Commission's rules governing procedures for domestic transfer of control/asset (“FCC Approval”), hereby agrees to transfer, assign, and convey to NEWPORT INVESTMENT GROUP, LLC any and all assets, licenses, furniture, fixtures, equipment (whether owned or leased), station records, programing files, and/or any related materials of Defendant PHILADELPHIA TELEVISION NETWORK, INC., including that certain FCC License WCFG-LD (Philadelphia, PA; FCC Facility #167606) a UHF, Digital Low Power TV Station serving the Tri-State area television market of Philadelphia, Pennsylvania (“PTN Assets”); and

WHEREAS, RICHARD H. GLANTON had previously filed for Bankruptcy under Chapter 11 of the United States Bankruptcy Code in the U.S. Bankruptcy Court for the District of New Jersey, Case Number 17-24279-CMG (“Bankruptcy Case”), and this Bankruptcy Case

has now been dismissed as part of, and in consideration for, Assignee NEWPORT INVESTMENT GROUP, LLC as the largest creditor entering into this Agreement to transfer, assign and convey, upon FCC Approval, the License and all PTN Assets of Defendant PHILADELPHIA TELEVISION NETWORK, INC. to NEWPORT INVESTMENT GROUP, LLC, including any all rights, title and interest to all shares of stock, in partial satisfaction of this Judgment. A true and correct copy of the Order granting the Dismissal is attached hereto as **Exhibit “B”** and incorporated herein; and

WHEREAS, RICHARD H. GLANTON, as Chairman and Chief Executive Officer of PHILADELPHIA TELEVISION NETWORK, INC. has further agreed that upon FCC Approval, all control, possession, and ownership of PHILADELPHIA TELEVISION NETWORK, INC. and its License shall be transferred forthwith to NEWPORT INVESTMENT GROUP, LLC as assignee of the Judgment entered herein, in partial satisfaction of the Judgment, which assignment shall include any and all payment proceeds, rights or dividends in the PTN Assets; and

WHEREAS, the amount of the partial satisfaction of the Judgment will be determined based upon the amount realized and recovered by NEWPORT INVESTMENT GROUP, LLC from the assigned PTN Assets once sold and disposed of; and

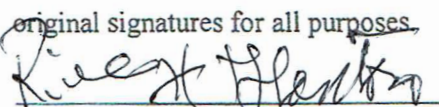
WHEREAS, the Parties hereto, each represent and warrant for themselves, that they have the authorization and right to enter into the referenced Agreement assigning the rights and assets referenced herein, and this stipulation, to wit.

Based upon the foregoing Recitals and the Agreement reached between NEWPORT INVESTMENT GROUP, LLC, as the Assignee of Plaintiff LUXURY ASSET LENDING, LLC, and Defendants PHILADELPHIA TELEVISION NETWORK, INC. and RICHARD H. GLANTON,

IT IS HEREBY STIPULATED AND AGREED, that

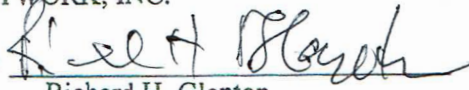
An Order, in the form annexed hereto, shall be issued, assigning to NEWPORT INVESTMENT GROUP, LLC, as the Assignee of Plaintiff LUXURY ASSET LENDING, LLC: (a) all rights, title and interest in all shares of stock in PHILADELPHIA TELEVISION NETWORK, INC., which were issued to RICHARD H. GLANTON, whether standing in his name or beneficially held by PHILADELPHIA TELEVISION NETWORK, INC. for RICHARD H. GLANTON, the quantity of which is represented to be 425 shares of stock; and (b) upon FCC Approval, all control, possession and ownership of PHILADELPHIA TELEVISION NETWORK, INC., License, and any and all PTN Assets to NEWPORT INVESTMENT GROUP, LLC as assignee of the Judgment entered herein, in partial satisfaction of the Judgment, which assignment shall include any and all payment proceeds, rights or dividends in the FCC License WFG-LD (Philadelphia, PA; FCC Facility #167606) a UHF, Digital Low Power TV Station serving the Tri-State area television market of Philadelphia, Pennsylvania;

IT IS FURTHER STIPULATED that this document may be executed by facsimile or email and in counterpart signatures with each counterpart signature constituting an original. It is the express intent of all Parties that facsimile or emailed signatures be accepted as and constitute original signatures for all purposes.


Richard H. Glanton


Dated: 5-8-16

PHILADELPHIA TELEVISION
NETWORK, INC.

By: 
Richard H. Glanton
Chairman and CEO

Dated: 5-8-16

NEWPORT INVESTMENT GROUP, LLC

By: 
Brian Roche
Managing Member

Dated: 5-8-16

ATTORNEY OR PARTY WITHOUT ATTORNEY: NAME: STUART A. KATZ STATE BAR NO.: 118098 FIRM NAME: LAW OFFICES OF STUART A KATZ, P.C. STREET ADDRESS: 940 South Coast Dr., Suite 203 CITY: Costa Mesa STATE: CA ZIP CODE: 92626 TELEPHONE NO.: (949) 660-1916 FAX NO.: (949) 660-1716 E-MAIL ADDRESS: stuart@stuartkatzlaw.com ATTORNEY FOR (name): JUDGMENT CREDITOR <input type="checkbox"/> ORIGINAL JUDGMENT CREDITOR <input checked="" type="checkbox"/> ASSIGNEE OF RECORD	FOR COURT USE ONLY <div style="border: 2px solid orange; padding: 5px; margin: 10px auto; width: 80%;"> Pursuant to California Government Code § 68150(f), the Clerk of the Court hereby certifies this document accurately reflects the official court record. The electronic signature and seal on this document have the same validity and legal force and effect as an original clerk's signature and court seal. California Government Code § 68150(g). </div>
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Orange STREET ADDRESS: 700 Civic Center Drive West MAILING ADDRESS: CITY AND ZIP CODE: Santa Ana, CA 92701 BRANCH NAME: Central Justice Center	
Plaintiff: LUXURY ASSET LENDING, LLC Defendant: PHILADELPHIA TELEVISION NETWORK, INC.; RICHARD H. GLANTON <input checked="" type="checkbox"/> EXECUTION (Money Judgment) WRIT OF <input type="checkbox"/> POSSESSION OF <input type="checkbox"/> Personal Property <input type="checkbox"/> SALE <input type="checkbox"/> Real Property	CASE NUMBER: 30-2016-00880965-CU-BC-CJC <input type="checkbox"/> Limited Civil Case (including Small Claims) <input checked="" type="checkbox"/> Unlimited Civil Case (including Family and Probate)

1. To the Sheriff or Marshal of the County of: Orange

You are directed to enforce the judgment described below with daily interest and your costs as provided by law.

2. To any registered process server: You are authorized to serve this writ only in accordance with CCP 699.080 or CCP 715.040.

3. (Name): NEWPORT INVESTMENT GROUP, LLC

is the ☐ original judgment creditor ☒ assignee of record whose address is shown on this form above the court's name.

4. Judgment debtor (name, type of legal entity if not a natural person, and last known address):

PHILADELPHIA TELEVISION NETWORK, INC.
 2 John Ln.
 Lafayette Hill, PA 19444

9. ☐ See next page for information on real or personal property to be delivered under a writ of possession or sold under a writ of sale.

10. ☐ This writ is issued on a sister-state judgment.

For Items 11–17, see form MC-012 and form MC-013-INFO

11. Total judgment (as entered or renewed) \$ 3,897,919.22

12. Costs after judgment (CCP 685.090) \$ 0.00

13. Subtotal (add 11 and 12) \$ 3,897,919.22

14. Credits to principal (after credit to interest) \$ 0.00

15. Principal remaining due (subtract 14 from 13) \$ 3,897,919.22

16. Accrued Interest remaining due per CCP 685.050(b) (not on GC 6103.5 fees) \$ 763,904.61

17. Fee for issuance of writ \$ 25.00

18. Total (add 15, 16, and 17) \$ 4,661,848.83

5. Judgment entered on (date):

4/6/2017

6. ☐ Judgment renewed on (dates):

19. Levying officer:

a. Add daily interest from date of writ (at the legal rate on 15) (not on GC 6103.5 fees) \$ 1,067.92

b. Pay directly to court costs included in 11 and 17 (GC 6103.5, 68637; CCP 699.520(i)) \$ 0.00

20. ☐ The amounts called for in items 11-19 are different for each debtor. These amounts are stated for each debtor on Attachment 20.

David H. Yamasaki, Clerk of the Court

Issued on (date): 04/15/2019

Clerk, by

Samuel Wilson

S. Wilson

Deputy

NOTICE TO PERSON SERVED: SEE PAGE 3 FOR IMPORTANT INFORMATION.

Page 1 of 3



Plaintiff: LUXURY ASSET LENDING, LLC Defendant: PHILADELPHIA TELEVISION NETWORK, INC.; RICHARD H. GLANTON	CASE NUMBER: 30-2016-00880965-CU-BC-CJC
--	---

21. ☒ Additional judgment debtor (name, type of legal entity if not a natural person, and last known address):

RICHARD H. GLANTON
26 SNOWDEN LN
PRINCETON, NJ 08540

22. ☐ Notice of sale has been requested by (name and address):

23. ☐ Joint debtor was declared bound by the judgment (CCP 989-994)

a. on (date):

b. name, type of legal entity if not a natural person, and last known address of joint debtor:

a. on (date):

b. name, type of legal entity if not a natural person, and last known address of joint debtor:

c. ☐ Additional costs against certain joint debtors are itemized: ☐ Below ☐ On Attachment 23c

24. ☐ (Writ of Possession or Writ of Sale) **Judgment** was entered for the following:

a. ☐ Possession of real property: The complaint was filed on (date):

(Check (1) or (2). Check (3) if applicable. Complete (4) if (2) or (3) have been checked.)

- (1) ☐ The Prejudgment Claim of Right to Possession was served in compliance with CCP 415.46. The judgment includes all tenants, subtenants, named claimants, and other occupants of the premises.
- (2) ☐ The Prejudgment Claim of Right to Possession was NOT served in compliance with CCP 415.46.
- (3) ☐ The unlawful detainer resulted from a foreclosure sale of a rental housing unit. (An occupant not named in the judgment may file a Claim of Right to Possession at any time up to and including the time the levying officer returns to effect eviction, regardless of whether a Prejudgment Claim of Right to Possession was served.) (See CCP 415.46 and 1174.3(a)(2).)
- (4) If the unlawful detainer resulted from a foreclosure (item 24a(3)), or if the Prejudgment Claim of Right to Possession was not served in compliance with CCP 415.46 (item 24a(2)), answer the following:
- (a) The daily rental value on the date the complaint was filed was \$
- (b) The court will hear objections to enforcement of the judgment under CCP 1174.3 on the following dates (specify):

b. ☐ Possession of personal property.

☐ If delivery cannot be had, then for the value (itemize in 24e) specified in the judgment or supplemental order.

c. ☐ Sale of personal property.

d. ☐ Sale of real property.

e. The property is described: ☐ Below ☐ On Attachment 24e

Plaintiff: LUXURY ASSET LENDING, LLC
 Defendant: PHILADELPHIA TELEVISION NETWORK, INC.; RICHARD H. GLANTON

CASE NUMBER:
 30-2016-00880965-CU-BC-CJC

NOTICE TO PERSON SERVED

WRIT OF EXECUTION OR SALE. Your rights and duties are indicated on the accompanying *Notice of Levy* (form EJ-150).

WRIT OF POSSESSION OF PERSONAL PROPERTY. If the levying officer is not able to take custody of the property, the levying officer will demand that you turn over the property. If custody is not obtained following demand, the judgment may be enforced as a money judgment for the value of the property specified in the judgment or in a supplemental order.

WRIT OF POSSESSION OF REAL PROPERTY. If the premises are not vacated within five days after the date of service on the occupant or, if service is by posting, within five days after service on you, the levying officer will remove the occupants from the real property and place the judgment creditor in possession of the property. Except for a mobile home, personal property remaining on the premises will be sold or otherwise disposed of in accordance with CCP 1174 unless you or the owner of the property pays the judgment creditor the reasonable cost of storage and takes possession of the personal property not later than 15 days after the time the judgment creditor takes possession of the premises.

EXCEPTION IF RENTAL HOUSING UNIT WAS FORECLOSED. If the residential property that you are renting was sold in a foreclosure, you have additional time before you must vacate the premises. If you have a lease for a fixed term, such as for a year, you may remain in the property until the term is up. If you have a periodic lease or tenancy, such as from month-to-month, you may remain in the property for 90 days after receiving a notice to quit. A blank form *Claim of Right to Possession and Notice of Hearing* (form CP10) accompanies this writ. You may claim your right to remain on the property by filling it out and giving it to the sheriff or levying officer.

EXCEPTION IF YOU WERE NOT SERVED WITH A FORM CALLED PREJUDGMENT CLAIM OF RIGHT TO POSSESSION. If you were not named in the judgment for possession and you occupied the premises on the date on which the unlawful detainer case was filed, you may object to the enforcement of the judgment against you. You must complete the form *Claim of Right to Possession and Notice of Hearing* (form CP10) and give it to the sheriff or levying officer. A blank form accompanies this writ. You have this right whether or not the property you are renting was sold in a foreclosure.

DEPARTMENT OF THE TREASURY
DIVISION OF REVENUE

6/2/2022

UNIFORM COMMERCIAL CODE SECTION
PO BOX 303
TRENTON, NJ 08646

PAGE 001

SEARCH CERTIFICATE # 50272814

SEARCH CRITERIA: RICHARD HOWARD GLANTON , PRINCETON

** DEBTOR **

6513596

RICHARD HOWARD GLANTON
26 SNOWDEN LANE
PRINCETON, NJ 08540

Secured Party: NEWPORT INVESTMENT GROUP, LLC
2620 S. MARYLAND PKWY
#14-136
LAS VEGAS, NV 89109

Filing Number: 53111294


Filing Date: 11/28/2018

Maturity Date: 11/28/2023

Filing History: 11/28/2018 UCC1

THE UNDERSIGNED FILING OFFICER HEREBY CERTIFIES THAT THE ABOVE LISTING IS A RECORD OF ALL PRESENTLY EFFECTIVE FINANCING STATEMENTS WHICH NAME THE ABOVE DEBTOR AND WHICH ARE ON FILE IN MY OFFICE AS OF 6/2/2022. THIS CERTIFICATE ISSUED ON 6/6/2022 8:33:58 PM.




Elizabeth Maher Muoio
State Treasurer

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional) NEWPORT INVESTMENT GROUP, LLC 8582542000	
B. E-MAIL CONTACT AT FILER (optional) OFFICE@LIBERTYFINANCIALUSA.COM	
C. SEND ACKNOWLEDGMENT TO: (Name and Address) NEWPORT INVESTMENT GROUP, LLC 2620 S. Maryland Pkwy #14-136 Las Vegas, NV 89109 US	

State of New Jersey
Department of the Treasury
Division of Revenue & Enterprise Services
UCC Section
Filed

Filing Number: 53111294

11/28/18 15:59:29

THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY

1. DEBTOR'S NAME: Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

1a. ORGANIZATION'S NAME					
OR	1b. INDIVIDUAL'S SURNAME GLANTON		FIRST PERSONAL NAME RICHARD	ADDITIONAL NAME(S)/INITIAL(S) HOWARD	SUFFIX
1c. MAILING ADDRESS 26 Snowden Lane		CITY Princeton	STATE NJ	POSTAL CODE 08540	COUNTRY US

2. DEBTOR'S NAME: Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

2a. ORGANIZATION'S NAME					
OR	2b. INDIVIDUAL'S SURNAME		FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
2c. MAILING ADDRESS		CITY	STATE	POSTAL CODE	COUNTRY

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

3a. ORGANIZATION'S NAME Newport Investment Group, LLC					
OR	3b. INDIVIDUAL'S SURNAME		FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
3c. MAILING ADDRESS 2620 S. Maryland Pkwy, #14-136		CITY Las Vegas	STATE NV	POSTAL CODE 89109	COUNTRY US

4. COLLATERAL: This financing statement covers the following collateral:

See attachment.

5. Check <u>only</u> if applicable and check <u>only</u> one box: Collateral is <input type="checkbox"/> held in a Trust (see UCC1Ad, item 17 and Instructions) <input type="checkbox"/> being administered by a Decedent's Personal Representative					
6a. Check <u>only</u> if applicable and check <u>only</u> one box: <input type="checkbox"/> Public-Finance Transaction <input type="checkbox"/> Manufactured-Home Transaction <input type="checkbox"/> A Debtor is a Transmitting Utility			6b. Check <u>only</u> if applicable and check <u>only</u> one box: <input type="checkbox"/> Agricultural Lien <input type="checkbox"/> Non-UCC Filing		
7. ALTERNATIVE DESIGNATION (if applicable): <input type="checkbox"/> Lessee/Lessor <input type="checkbox"/> Consignee/Consignor <input type="checkbox"/> Seller/Buyer <input type="checkbox"/> Bailee/Bailor <input type="checkbox"/> Licensee/Licensor					
8. OPTIONAL FILER REFERENCE DATA:					

EXHIBIT C

CERTIFIED AUDIO TRANSCRIPT OF RICHARD HOWARD GLANTON §341
MEETING OF CREDITORS—MARCH 17, 2022

United States Bankruptcy Court for the District of New Jersey, Case No. 22-
11055-CMG

<https://www.dropbox.com/s/pz8xs4s62g2uomw/341%20-%20Glanton%2C%2022-11055-CMG%20on%203.17.22.mp3?dl=0>

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Thaddeus R. Maciag, Esq.
MACIAG LAW, LLC
475 Wall Street
Princeton, New Jersey 08540
(908) 704-8800
Attorney for the Debtor-in-Possession

In re:

Richard H. Glanton,

Debtor-in-Possession.

Case No.: #22-11055-CMG
Chapter 11
Judge: Hon. Christine M. Gravelle
Hearing Date: May 24, 2022, 10am

**DEBTOR'S CERTIFICATION
IN OPPOSITION TO
UNSECURED CREDITOR TCG/CELERA'S MOTION
TO CONVERT TO CHAPTER 7**

RICHARD GLANTON, of full age, hereby certifies and says:

(1) I am the Debtor-in-Possession in this case; as such I am familiar with the facts set forth in this Certification, which I make in Opposition to the Motion to Convert to Chapter 7 filed by Unsecured Creditor TCG Research Ltd., and Celera Management Ltd. ("TCG/Celera").

(2) Movant TCG/Celera has made no showing of meeting any one of the sixteen factors of "Cause" for conversion as enumerated in the U.S. Bankruptcy Code at 11 U.S.C. 1112(b)(4)(A) through (b)(4)(G). Movant has not shown that any one of these sixteen factors apply to my conduct in this case; not one. The sixteen factors of "cause" set forth by the Code, none of which the Movant has shown, are listed at 11 U.S.C. 1112(b)(4). Section

1112(b)(4) provides:

§1112(b)(4) For purposes of this subsection, the term `cause' includes —

- (A) substantial or continuing loss to or diminution of the estate and the absence of a reasonable likelihood of rehabilitation;
- (B) gross mismanagement of the estate;
- [C] failure to maintain appropriate insurance that poses a risk to the estate or to the public;
- (D) unauthorized use of cash collateral substantially harmful to 1 or more creditors;
- (E) failure to comply with an order of the court;
- (F) unexcused failure to satisfy timely any filing or reporting requirement established by this title or by any rule applicable to a case under this chapter;
- (G) failure to attend the meeting of creditors convened under section 341(a) or an examination ordered under rule 2004 of the Federal Rules of Bankruptcy Procedure without good cause shown by the debtor;
- (H) failure timely to provide information or attend meetings reasonably requested by the United States trustee (or the bankruptcy administrator, if any);
- (I) failure timely to pay taxes owed after the date of the order for relief or to file tax returns due after the date of the order for relief;
- (J) failure to file a disclosure statement, or to file or confirm a

plan, within the time fixed by this title or by order of the court;

(K) failure to pay any fees or charges required under chapter 123 of title 28;

(L) revocation of an order of confirmation under section 1144;

(M) inability to effectuate substantial consummation of a confirmed plan;

(N) material default by the debtor with respect to a confirmed plan;

(O) termination of a confirmed plan by reason of the occurrence of a condition specified in the plan; and

(P) failure of the debtor to pay any domestic support obligation that first becomes payable after the date of the filing of the petition.

(3) Having failed to meet any one of the sixteen (16) factors of “cause” set forth by the Code at §1112(b)(4) , Movant instead seeks to advance a catch-all “bad faith” argument, based on the argument that this Court, in an extreme circumstance, has the power to look even beyond the sixteen factors of “cause” which the Code sets forth.

(4) However, even Movant’s catch-all argument generically suggesting “bad faith” also falls far short of the standard required to involuntarily convert a very recently-filed case for supposed “cause”. Many of Movant’s alleged bad faith arguments are simply inapplicable to a case which was only 82 days old at the time the instant Motion was filed, and which even at this writing is only 97 days old. As my counsel set forth in the accompanying Memorandum of Law, caselaw where a Court finds cause are often cases where the reorganization is a year or more old, and a Debtor has, for example, unsuccessfully promulgated a Plan of Reorganization followed by 11 successive Modified Plans, all 12 of which have failed. Given that my 120-day exclusivity period as Debtor has not even arrived

yet (and as of the Motion filing date, was still almost 40 days away), this Motion, at best, can be viewed as having been precipitately and prematurely filed.

(5) More specifically, the generic catch-all “bad faith” arguments advanced by Movant are simply unsupported by the Facts, as the allegations set forth in the uncertified Memorandum of Law filed by Movant’s Counsel are not consistent with the factual record, including:

(A) Movant’s counsel vociferously and even cholericly belabors the fact that I have thus far been unable to pay the second \$200,000.00 of an agreed settlement, but disingenuously glosses over the fact that ***I already, in utmost good faith paid, in July 2021, more than \$100,000.00 toward the Settlement!*** First, there is of course no bar whatsoever to filing a Chapter 11 Petition when a Debtor finds that it can not keep up with payments under the terms of a previously Settlement; that is a very commonplace, garden-variety cause of Chapter 11 filings, and is hardly a matter of “bad faith”. Further, quaere: if my goal was to wilfully act in deliberate “bad faith, then why in heaven’s name would I have paid \$100,000.00+ in July 2021, when I could easily have saved that cash flow and filed a Chapter 11 Petition at an earlier date, with that first \$100,000.00 still unpaid. Even further, quaere: if my intent was to act in a “bad faith” manner, all I had to do was to file a Chapter 11 Petition within 90 days of my rendering that \$100,000.00 and I could have clawed it back as a voidable preference! As an Attorney at Law myself, I was well aware of both of those options, yet I forbore to take advantage of either of them, costing myself \$100,000.,00 in cash flow, and putting \$100,000.00 in TCG/Celera’s pocket a little over five months prior to filing this case! I respectfully submit that my actions in that regard are indicative of my utmost **Good Faith**, not of bad faith at all.

(B) Movant’s counsel alleges in the Memorandum of Law that: “*The Debtor’s pre-Petition conduct was clearly fraudulent*”, based on expressing Movant’s

dismay that in December 2021, two months before this case was even filed, I as the Debtor made an Estate Planning transfer of my 50% interest in our family home to my wife. I am 75 years old, and that is a common-place estate planning decision made by people my age, and that allegation by the Movant is nothing more than a tempest in a teapot.. (I) That estate-planning transfer was plainly and fully disclosed in my Petition, Schedules, and Statement of Financial Affairs, and was never in the least hidden or concealed. (ii) That estate-planning transfer was plainly and openly disclosed at my 341 Meeting of Creditors, and was never in the least hidden or concealed. (iii) That estate-planning transfer was plainly and openly disclosed at the April 5 Status conference before Your Honor, and was never in the least hidden or concealed. in my Petition, Schedules, and Statement of Financial Affairs, and was never in the least hidden or concealed. (iv) As my attorney stated on the record at both the 341 hearing and the April 5 Status Conference before this Court, that estate-planning transfer, already disclosed in my schedules, was further underscored in his introductory phone call from the United States Trustee Trial Attorney making the usual phone call early in this case to discuss the general nature of the case with the Debtor-in-Possession's attorney in the ordinary course of D.N.J. Chapter 11 Reorganization cases; (v) at the April 5 Status Conference before this Court, Your Honor suggested that upon my filing a Certification certifying that I acknowledged that my share of ownership of my residence was well within the look-back period (as an Attorney at Law myself, I of course *know* that there is a multi-year lookback period after an estate planning transfer, and I would never have for a single moment thought that an estate-planning transfer to my wife would in any way shield the property from creditors or remove it from my Debtor's Estate in any future bankruptcy; again, I respectfully note that as an attorney at law I of course *know* that and it is absurd to suggest that I somehow thought that by my transferring my 50% ownership of our home to my wife (who is not as old as I am), that I would somehow be shielding it

from creditors – again, needless to say, I know better); (vi) I then ecf-filed on the PACER Docket in this case the Certification suggested by the Court at the April 5 Status conference later *that same day*, April 5, 2022 [see EXHIBIT A to this Certification]; (vii) then, when on April 7, 2022 Movant’s attorney asked if I would consent to same being recorded, I promptly and readily agreed to that request [see EXHIBIT B to this Certification]. In fact, if any party has acted in “bad faith” in the past several weeks, I would submit it has been Movant who, notwithstanding that the discussion with this Court at the April 5 Status Conference implied that the filing of the requested Certification should avoid the filing of an unnecessary Motion, but I then even further readily acquiesced to Movant’s request that I consent to the Recording of that Certification, nonetheless went ahead and filed the instant Motion anyway, notwithstanding all of my cooperation with all of the Movant’s requests. The reader is strongly urged to carefully review EXHIBIT A hereto, in which I and my wife both certified, *inter alia*, that “*The occurrence of that Estate Planning transfer was also openly disclosed in the earliest discussions with the U.S. Trustee Trial Attorney assigned to this case, and at the 341 Meeting of Creditors. We, the undersigned, Richard and Eileen Glanton, as attorneys at law, are of course aware that transaction occurred within two years prior to the filing of the instant Chapter 11 case. (3) We therefore, by our signatures below, hereby Certify and Stipulate that the value of Richard H. Glanton’s 50% share of our family residence at 26 Snowden Lane, Princeton, New Jersey, shall be deemed part of the Debtor’s Estate in this case, including for purposes of any Liquidation Analysis or Balance Sheet to be filed in this case. (4) We further hereby Certify and Stipulate: (a) that since the date of that December 2021 estate planning transfer referenced herein, our real property at 26 Snowden Lane, Princeton, New Jersey has not been sold, transferred, liened, nor encumbered; and (b) that both Richard Glanton and Eileen Glanton will not take any action to sell, transfer, nor allow or consent to any lien or encumbrance, on said real*

property, pending further Order of the Court.” Again, the reader is respectfully urged to carefully review EXHIBIT A hereto, in its entirety. Exhibit A was not only filed on the within docket April 5, 2022, but I on April 7, 2022 also readily consented to Movant’s counsel request that same be Recorded against the property (see EXHIBIT B to this Certification).

[C] Movant’s counsel alleges in the Memorandum of Law that “*The Debtor has no ongoing business operation or employees*”. The lack of “employees” is essentially not relevant to my case; this is an Individual Chapter 11 Reorganization case; the Code permits an individual to file for Chapter 11 Reorganization. As for lack of “ongoing business operations” that is simply not true; in the context of an individual case, that I have a household income of \$28,750.33 per month, as shown on my Schedule I (see EXHIBIT C to this Certification). In the context of an individual Chapter 7, my personal “business operations” generate \$21,667.00 per month, and my non-Debtor spouse adds another \$7,083.33 to our income each month from the job she started February 23, 2022, after many years as a homemaker. Our daughter is now 12 years, and that return to work after several years as a homemaker, is a commonplace occurrence in many households, for a homemaker spouse to return to work once a young child grows older.

(D) Movant’s counsel alleges in the Memorandum of Law that “*There is no possibility of a reorganization in this matter, within a reasonable period of time or not, and certainly no reorganization efforts that are in progress*” and further makes a wholly unsubstantiated allegation that Nonsense; Movant’ made that statement in the Memorandum of law filed only 82 days Post-Petition. The instant Motion was filed only 82 days into the case; I will file a plan within the 120-day exclusivity period, which Plan will fully meet the “Feasibility” standards of the Code and applicable caselaw, as my attorney addresses in his accompanying Memorandum of Law. As to “steps toward a successful reorganization” or as showing that “reorganization efforts

are in progress”, notwithstanding that in these first three months of this case I have been in what the U.S. Bankruptcy Code recognizes as the “breathing spell” for the Debtor-in-Possession at the outset of a Chapter 11 Reorganization case, **I have already taken two very specific and concrete steps toward a successful reorganization:** (I) first, I have successfully attained reappointment to a Board of Directors position which will continue to bring me close to \$300,000.00 per year in income, and (ii) second, as noted above, my wife, who in an ideal world would have preferred to wait perhaps another year or two until our now 12-year-old daughter was at or approaching high school age, instead went back to work two weeks after the Petition was filed, and is now earning \$85,000.00 per year, as further income to our household. In the meanwhile, our mortgage payments, utility bills, and household expenses, have all been kept fully current and up to date. The true facts show no inability whatsoever to successfully reorganize under the Code. In that regard, I will be filing a proposed Plan & Disclosure Statement on or **before June 9, 2022, within my 120-day exclusivity period.**

(E) Movant’s counsel alleges in the Memorandum of Law that “*The Debtor has relatively little in the way of cash flow or income to fund payment of creditor claims.*” Again, for the same reasons set forth in the immediate preceding Paragraph 5(B) hereinabove, this wholly unsubstantiated allegation is entirely inconsistent with the Facts. As I explain in paragraph 5(B) immediately above, “I have a household income of \$28,750.33 per month, as shown on my Schedule I (see EXHIBIT C to this Certification). In the context of an individual Chapter 7, my personal “business operations” generate \$21,667.00 per month, and my non-Debtor spouse adds another \$7,083.33 to our income each month from the job she started February 23, 2022, after many years as a homemaker household income as shown on Schedule I.” No reasonable person could possibly characterize \$28,750.33 as “*relatively little in the way of cash flow or income*”. Further, a review of my Monthly Operating Reports for

February 9-29 and March 1-31, will show that in the first 50 days that this case was pending my Income was \$68,125.00 from employment and \$6,002.60 from Social Security, or a Monthly Average of \$34,062.50 from employment and \$3,001.30 from Social Security. Those sums do not even include my wife's contribution to our household income of \$1,245.02 per week (or \$5,375.10 in a 4.33-week month), now that she has returned to work after several years as a homemaker. I again respectfully note that Movant's reckless accusation that I as the Debtor have relatively little in the way of cash flow or income is wholly inconsistent with my Schedule I, nor will it be consistent upon a review of my Monthly Operating Reports and the bank statements filed as exhibits to same.

(F) Movant's counsel alleges in the Memorandum of Law that "*The sole asset of the estate of any value is the Real Estate, or the fraudulent transfer claim resulting from the conveyance of the Real Estate.*" (I) First, the suggestion that there is any kind of bona fide "fraudulent conveyance claim" of the Real Estate is simply an unfounded cheap shot intended to cast me in a false light before this Court; as fully detailed in Paragraph 5(A) hereinabove, any "fraudulent conveyance" would be frivolous, not only based on the underlying Facts of my estate-planing transfer, but also because of the Certification that I filed on the within Court docket at Pacer #28 (see EXHIBIT A to this Certification) and to my readily acquiescence to MOvant's request that I consent to same being recorded (see EXHIBIT B to this Certification). Given that, any allegation of a "fraudulent conveyance" is frivolous. As to the allegation that "*The sole asset of the estate of any value is the Real Estate*" that allegation is also unfounded and not consistent with the Facts. Even if one were to ignore my automobile with its blue book value of \$15,444.00 and my joint checking account with my wife which as of the closing date our most recent bank statement (for the period 3/18/2022 through 4/19/2022) has a balance of \$19,537.39, Movant is also very well aware of the very substantial value of my 51% ownership of the Philadelphia

Television Network Inc. ("PTNI"). Movant was present, through counsel, at both the 341 hearing and the April 5, 2022 Status Conference in this case, on both of which occasions we discussed the fact that due to a recent favorable California appeals court decision in my favor, makes me the owner of 51% of an asset which, conservatively, is worth in excess of \$1.5 Million (see EXHIBIT D to this Certification), with my share thus worth more than \$750,000.00, which exceeds the net equity in my 50% share of my residence which I co-own with my spouse. So not only is my residential Real Estate not my sole asset, it is not even my largest asset. The existence of my 51% share of PTNI Network was discussed at length at my 341 Meeting, at which the Attorney for PTNI appeared and verified that fact; and same was further discussed at the April 5, Status Conference before this Court. For Movant to in its May 2, 2022 Motion papers completely ignore that asset is disingenuous.

Plan of Reorganization

(6) Consistent with the foregoing, I intend to, on or before Jun 9, 2022, within my 120-day exclusivity period, file with this Court a proposed Original Plan of Reorganization and Disclosure Statement providing for substantial regular monthly payments to creditors, until the sale of my 51% shareholding in Philadelphia Television Network Inc., upon which all Allowed Claims will be paid off in full. Per EXHIBIT D to this Certification, the sale of Philadelphia Television Network Inc. is anticipated to close within 150 to 180 days.

I hereby certify that the foregoing statements made by me are true; I am aware that if they are wilfully false, I am subject to punishment.

/s/ 

Richard Howard Glanton
Debtor-in-Possession

Date: May 17, 2022

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Thaddeus R. Maciag, Esq.
MACIAG LAW, LLC
475 Wall Street
Princeton, New Jersey 08540
(908) 704-8800
Attorney for the Debtor-in-Possession

In re:

Richard H. Glanton,

Debtor-in-Possession.

Case No.: #22-11055-CMG
Chapter 11
Judge: Hon. Christine M. Gravelle
Hearing Date: May 24, 2022, 10am

Exhibit A

to

**DEBTOR'S CERTIFICATION
IN OPPOSITION TO
UNSECURED CREDITOR TCG/CELERA'S MOTION
TO CONVERT TO CHAPTER 7**

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Thaddeus R. Maciag, Esq.
MACIAG LAW, LLC
475 Wall Street
Princeton, New Jersey 08540
(908) 704-8800
Attorney for the Debtor-in-Possession

In re:

Richard H. Glanton,

Debtor-in-Possession.

Case No.: #22-11055-CMG
Chapter 11
Judge: Hon. Christine M. Gravelle
Hearing Date: April 5, 2022

**CERTIFICATION AND STIPULATION
AS TO PROPERTY
OF THE DEBTOR'S ESTATE**

RICHARD GLANTON and EILEEN GLANTON, of full age, hereby certify and say:

(1) Richard Glanton is the Debtor-in-Possession in this case; Eileen Glanton is the spouse of Richard Glanton; both of us are attorneys at law. As such we are both familiar with the facts set forth in this Certification, which we file in accord with the discussion between the Court, Counsel for various Creditors, and our own counsel, at today's April 5, 2022 Chapter 11 Status Conference in this case.

(2) Debtor Richard H. Glanton disclosed, at Line 18 of the filed Statement of Financial Affairs [*see Pacer Docket 18, at page 22 of 24*] in this case, that as part of Estate Planning for Richard Glanton (who is 76 years old), he in December 2021 had transferred his 50% interest in his family home at 26 Snowden Lane, Princeton, NJ, to Eileen Glanton, his wife. The occurrence of that Estate Planning transfer was also openly disclosed in the

earliest discussions with the U.S. Trustee Trial Attorney assigned to this case, and at the 341 Meeting of Creditors. We, the undersigned, Richard and Eileen Glanton, as attorneys at law, are of course aware that transaction occurred within two years prior to the filing of the instant Chapter 11 case.

(3) We therefore, by our signatures below, hereby Certify and Stipulate that the value of Richard H. Glanton's 50% share of our family residence at 26 Snowden Lane, Princeton, New Jersey, shall be deemed part of the Debtor's Estate in this case, including for purposes of any Liquidation Analysis or Balance Sheet to be filed in this case.

(4) We further hereby Certify and Stipulate: (a) that since the date of that December 2021 estate planning transfer referenced herein, our real property at 26 Snowden Lane, Princeton, New Jersey has not been sold, transferred, liened, nor encumbered; and (b) that both Richard Glanton and Eileen Glanton will not take any action to sell, transfer, nor allow or consent to any lien or encumbrance, on said real property, pending further Order of the Court.

We hereby certify that the foregoing statements made by us are true. We are aware that if they are wilfully false, we are subject to punishment.

/s/ 
Richard Howard Glanton
Debtor-in-Possession

/s/ 
Eileen Glanton

Date: April 5, 2022

April 5, 2022

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Thaddeus R. Maciag, Esq.
MACIAG LAW, LLC
475 Wall Street
Princeton, New Jersey 08540
(908) 704-8800
Attorney for the Debtor-in-Possession

In re:

Richard H. Glanton,

Debtor-in-Possession.

Case No.: #22-11055-CMG
Chapter 11
Judge: Hon. Christine M. Gravelle
Hearing Date: May 24, 2022, 10am

Exhibit B

to

**DEBTOR'S CERTIFICATION
IN OPPOSITION TO
UNSECURED CREDITOR TCG/CELERA'S MOTION
TO CONVERT TO CHAPTER 7**

To: you + 1 more

Details

Document

Page 15 of 27

Glanton Stipulation.pdf (832 KB)

Ted:

We are in receipt of the attached Stipulation that you filed on the docket. Kindly advise whether you will agree to the recording of the Stipulation in the Mercer County property records against the property. As Ms. Glanton has no intention of selling the property, we trust this is not an issue and we can avoid seeking the Court's intervention. Kindly advise us by the end of this week as to your position.

Thank you.

Best,

Melissa


Melissa A. Peña, Esq.

t: 917.369.8847 | f: 212.808.0844 | e: mapena@norris-law.com | www.norrismclaughlin.com

NJ Office: 400 Crossing Blvd | 8th Floor | P.O. Box 5933 | Bridgewater, NJ 08807-5933

Bridgewater, NJ | New York, NY | Allentown, PA



 **Ted Maciag** (MaciagLaw1@aol.com)

To: **mapena_norris-law com** [Details](#) ▼

To: Melissa Pena Esq.

Melissa -- agreed, no objection to recording the Glanton Stip.

- Ted Maciag

Thaddeus R. Maciag, Esq.

MACIAG LAW, LLC

www.MaciagLaw.net

908-704-8800

[mobile: 908-704-8802]

To: you Details ▾

Thanks Ted.

Melissa A. Peña, Esq.

t: 917.369.8847 | f: 212.808.0844 | e: mapena@norris-law.com | www.norrismclaughlin.com
NJ Office: 400 Crossing Blvd | 8th Floor | P.O. Box 5933 | Bridgewater, NJ 08807-5933
Bridgewater, NJ | New York, NY | Allentown, PA



On Apr 7, 2022, at 12:57 PM, Ted Maciag <MaciagLaw1@aol.com> wrote:

To: Melissa Pena Esq.

Melissa -- agreed, no objection to recording the Glanton Stip.

- Ted Maciag

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Thaddeus R. Maciag, Esq.
MACIAG LAW, LLC
475 Wall Street
Princeton, New Jersey 08540
(908) 704-8800
Attorney for the Debtor-in-Possession

In re:

Richard H. Glanton,

Debtor-in-Possession.

Case No.: #22-11055-CMG
Chapter 11
Judge: Hon. Christine M. Gravelle
Hearing Date: May 24, 2022, 10am

Exhibit C

to

**DEBTOR'S CERTIFICATION
IN OPPOSITION TO
UNSECURED CREDITOR TCG/CELERA'S MOTION
TO CONVERT TO CHAPTER 7**

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Thaddeus R. Maciag, Esq.
MACIAG LAW, LLC
475 Wall Street
Princeton, New Jersey 08540
(908) 704-8800
Attorney for the Debtor

In re:

Richard H. Glanton,

Debtor-in-Possession.

Case No.: **22-11055-CMG**
Chapter 11 Reorganization
Judge: Gravelle

Amendment to Schedule I


The above referenced schedule is hereby amended as filed herewith:

- (1) *as to Schedules I*, at the time of filing of this case, the Debtor's non-filing spouse had for many years been a homemaker; she has since gone back to work and is now contributing financial income to the household, as set forth in the Amended Schedule I and as indicated in the comments set forth at page 2, paragraph 13, of the Amended Schedule I herein filed (*see attached*)
- (2) *as to Summary of Assets & Liabilities*, at Part 3, paragraph 4, to reflect the amendments here made to Schedule I.

DECLARATION AND VERIFIED STATEMENT OF NO OTHER CHANGES

I, the Debtor, hereby certify that this amendment is true and correct, and I hereby verify that the information contained in my bankruptcy petition remains true and accurate, as I am aware of no material changes, additions or deletions to my petition and schedules since the filing of the petition except for those contained in the Amendment referenced hereinabove.

Date: May 12, 2022

→ 
/s/ Richard H. Glanton
Richard Howard Glanton
Debtor-in-Possession

Fill in this information to identify your case:

Debtor 1 **Richard Howard Glanton**

First Name

Middle Name

Last Name

Debtor 2

(Spouse if, filing)

First Name

Middle Name

Last Name

United States Bankruptcy Court for the: **DISTRICT OF NEW JERSEY**Case number **22-11055-CMG**

(if known)

☐ Check if this is an amended filing

Official Form 106Sum

Summary of Your Assets and Liabilities and Certain Statistical Information

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. Fill out all of your schedules first; then complete the information on this form. If you are filing amended schedules after you file your original forms, you must fill out a new *Summary* and check the box at the top of this page.

Part 1: Summarize Your Assets

Your assets
Value of what you own

1. Schedule A/B: Property (Official Form 106A/B)

1a. Copy line 55, Total real estate, from Schedule A/B..... \$ 0.00

1b. Copy line 62, Total personal property, from Schedule A/B..... \$ 25,046.00

1c. Copy line 63, Total of all property on Schedule A/B..... \$ 25,046.00

Part 2: Summarize Your Liabilities

Your liabilities
Amount you owe

2. Schedule D: Creditors Who Have Claims Secured by Property (Official Form 106D)

2a. Copy the total you listed in Column A, Amount of claim, at the bottom of the last page of Part 1 of Schedule D... \$ 0.00

3. Schedule E/F: Creditors Who Have Unsecured Claims (Official Form 106E/F)

3a. Copy the total claims from Part 1 (priority unsecured claims) from line 6e of Schedule E/F..... \$ 0.00

3b. Copy the total claims from Part 2 (nonpriority unsecured claims) from line 6j of Schedule E/F..... \$ 407,657.50

Your total liabilities \$ 407,657.50

Part 3: Summarize Your Income and Expenses

4. Schedule I: Your Income (Official Form 106I)

Copy your combined monthly income from line 12 of Schedule I..... \$ 27,333.67

5. Schedule J: Your Expenses (Official Form 106J)

Copy your monthly expenses from line 22c of Schedule J..... \$ 16,300.34

Part 4: Answer These Questions for Administrative and Statistical Records

6. Are you filing for bankruptcy under Chapters 7, 11, or 13?

☐ No. You have nothing to report on this part of the form. Check this box and submit this form to the court with your other schedules.☒ Yes

7. What kind of debt do you have?

☒ Your debts are primarily consumer debts. Consumer debts are those "incurred by an individual primarily for a personal, family, or household purpose." 11 U.S.C. § 101(8). Fill out lines 8-9g for statistical purposes. 28 U.S.C. § 159.☐ Your debts are not primarily consumer debts. You have nothing to report on this part of the form. Check this box and submit this form to the court with your other schedules.

Debtor 1 Richard Howard GlantonCase number (if known) **22-11055-CMG**

8. From the **Statement of Your Current Monthly Income**: Copy your total current monthly income from Official Form 122A-1 Line 11; OR, Form 122B Line 11; OR, Form 122C-1 Line 14.

\$ **20,504.52**

9. Copy the following special categories of claims from Part 4, line 6 of **Schedule E/F**:

From Part 4 on Schedule E/F, copy the following:

	Total claim
9a. Domestic support obligations (Copy line 6a.)	\$ 0.00
9b. Taxes and certain other debts you owe the government. (Copy line 6b.)	\$ 0.00
9c. Claims for death or personal injury while you were intoxicated. (Copy line 6c.)	\$ 0.00
9d. Student loans. (Copy line 6f.)	\$ 0.00
9e. Obligations arising out of a separation agreement or divorce that you did not report as priority claims. (Copy line 6g.)	\$ 0.00
9f. Debts to pension or profit-sharing plans, and other similar debts. (Copy line 6h.)	+\$ 0.00
9g. Total. Add lines 9a through 9f.	\$ 0.00

Fill in this information to identify your case:

Debtor 1 Richard Howard Glanton

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the: DISTRICT OF NEW JERSEY

Case number 22-11055-CMG
(If known)

Check if this is:

- ☐ An amended filing
☐ A supplement showing postpetition chapter 13 income as of the following date:

MM / DD / YYYY

Official Form 106I

Schedule I: Your Income

12/15

Be as complete and accurate as possible. If two married people are filing together (Debtor 1 and Debtor 2), both are equally responsible for supplying correct information. If you are married and not filing jointly, and your spouse is living with you, include information about your spouse. If you are separated and your spouse is not filing with you, do not include information about your spouse. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Employment

1. Fill in your employment information.

If you have more than one job, attach a separate page with information about additional employers.

Include part-time, seasonal, or self-employed work.

Occupation may include student or homemaker, if it applies.

Employment status*

Occupation

Employer's name

Employer's address

Debtor 1

- ☒ Employed
☐ Not employed

Board Member

Aqua America

Debtor 2 or non-filing spouse

- ☒ Employed
☐ Not employed

law

RWJ Foundation

How long employed there?

*See Attachment for Additional Employment Information

Part 2: Give Details About Monthly Income

Estimate monthly income as of the date you file this form. If you have nothing to report for any line, write \$0 in the space. Include your non-filing spouse unless you are separated.

If you or your non-filing spouse have more than one employer, combine the information for all employers for that person on the lines below. If you need more space, attach a separate sheet to this form.

	For Debtor 1	For Debtor 2 or non-filing spouse
2. List monthly gross wages, salary, and commissions (before all payroll deductions). If not paid monthly, calculate what the monthly wage would be.	\$ 21,667.00	\$ 7,083.33
3. Estimate and list monthly overtime pay.	+\$ 0.00	+\$ 0.00
4. Calculate gross income. Add line 2 + line 3.	\$ 21,667.00	\$ 7,083.33

Debtor 1 **Richard Howard Glanton**Case number (if known) **22-11055-CMG**

	For Debtor 1	For Debtor 2 or non-filing spouse
Copy line 4 here	4. \$ 21,667.00	\$ 7,083.33
5. List all payroll deductions:		
5a. Tax, Medicare, and Social Security deductions	5a. \$ 0.00	\$ 1,416.66
5b. Mandatory contributions for retirement plans	5b. \$ 0.00	\$ 0.00
5c. Voluntary contributions for retirement plans	5c. \$ 0.00	\$ 0.00
5d. Required repayments of retirement fund loans	5d. \$ 0.00	\$ 0.00
5e. Insurance	5e. \$ 0.00	\$ 0.00
5f. Domestic support obligations	5f. \$ 0.00	\$ 0.00
5g. Union dues	5g. \$ 0.00	\$ 0.00
5h. Other deductions. Specify:	5h. \$ 0.00	\$ 0.00
6. Add the payroll deductions. Add lines 5a+5b+5c+5d+5e+5f+5g+5h.	6. \$ 0.00	\$ 1,416.66
7. Calculate total monthly take-home pay. Subtract line 6 from line 4.	7. \$ 21,667.00	\$ 5,666.67
8. List all other income regularly received:		
8a. Net income from rental property and from operating a business, profession, or farm Attach a statement for each property and business showing gross receipts, ordinary and necessary business expenses, and the total monthly net income.	8a. \$ 0.00	\$ 0.00
8b. Interest and dividends	8b. \$ 0.00	\$ 0.00
8c. Family support payments that you, a non-filing spouse, or a dependent regularly receive Include alimony, spousal support, child support, maintenance, divorce settlement, and property settlement.	8c. \$ 0.00	\$ 0.00
8d. Unemployment compensation	8d. \$ 0.00	\$ 0.00
8e. Social Security	8e. \$ 0.00	\$ 0.00
8f. Other government assistance that you regularly receive Include cash assistance and the value (if known) of any non-cash assistance that you receive, such as food stamps (benefits under the Supplemental Nutrition Assistance Program) or housing subsidies. Specify:	8f. \$ 0.00	\$ 0.00
8g. Pension or retirement income	8g. \$ 0.00	\$ 0.00
8h. Other monthly income. Specify:	8h. \$ 0.00	\$ 0.00
9. Add all other income. Add lines 8a+8b+8c+8d+8e+8f+8g+8h.	9. \$ 0.00	\$ 0.00
10. Calculate monthly income. Add line 7 + line 9. Add the entries in line 10 for Debtor 1 and Debtor 2 or non-filing spouse.	10. \$ 21,667.00	\$ 5,666.67
11. State all other regular contributions to the expenses that you list in Schedule J. Include contributions from an unmarried partner, members of your household, your dependents, your roommates, and other friends or relatives. Do not include any amounts already included in lines 2-10 or amounts that are not available to pay expenses listed in Schedule J. Specify:		11. +\$ 0.00
12. Add the amount in the last column of line 10 to the amount in line 11. The result is the combined monthly income. Write that amount on the Summary of Schedules and Statistical Summary of Certain Liabilities and Related Data, if it applies		12. \$ 27,333.67
		Combined monthly income
13. Do you expect an increase or decrease within the year after you file this form?		
<input type="checkbox"/> No.		
<input checked="" type="checkbox"/> Yes. Explain:		
(1) Debtor Richard's only income is from service on two corporate boards. There are also some stock benefits from time to time. Prospects of future annual reappointments look very uncertain. (2) Non-filing spouse Eileen had no income as of the 2/9/2022 case filing date; and thereafter, post-Petition, she returned to work after several years as a homemaker.		

Debtor 1 **Richard Howard Glanton**

Case number (if known) **22-11055-CMG**

Official Form B 6I
Attachment for Additional Employment Information

Debtor	
Occupation	Board Member
Name of Employer	Geo Group Inc.
How long employed	
Address of Employer	

Debtor	
Occupation	Board Member
Name of Employer	Mistras Group Inc.
How long employed	
Address of Employer	

Fill in this information to identify your case:

Debtor 1 **Richard Howard Glanton**
First Name Middle Name Last Name
Debtor 2
(Spouse if, filing) First Name Middle Name Last Name
United States Bankruptcy Court for the: **DISTRICT OF NEW JERSEY**
Case number **22-11055-CMG**
(if known)

☐ Check if this is an amended filing

Official Form 106Dec

Declaration About an Individual Debtor's Schedules

12/15

If two married people are filing together, both are equally responsible for supplying correct information.

You must file this form whenever you file bankruptcy schedules or amended schedules. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Sign Below

Did you pay or agree to pay someone who is NOT an attorney to help you fill out bankruptcy forms?

☒ No

☐ Yes. Name of person _____

Attach Bankruptcy Petition Preparer's Notice, Declaration, and Signature (Official Form 119)

Under penalty of perjury, I declare that I have read the summary and schedules filed with this declaration and that they are true and correct.

X /s/ Richard Howard Glanton

Richard Howard Glanton
Signature of Debtor 1

X _____

Signature of Debtor 2

Date May 12, 2022

Date _____

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Thaddeus R. Maciag, Esq.
MACIAG LAW, LLC
475 Wall Street
Princeton, New Jersey 08540
(908) 704-8800
Attorney for the Debtor-in-Possession

In re:

Richard H. Glanton,

Debtor-in-Possession.

Case No.: #22-11055-CMG

Chapter 11

Judge: Hon. Christine M. Gravelle

Hearing Date: May 24, 2022, 10am

Exhibit D

to

**DEBTOR'S CERTIFICATION
IN OPPOSITION TO
UNSECURED CREDITOR TCG/CELERA'S MOTION
TO CONVERT TO CHAPTER 7**

From: spark@dsppartners.com,
To: maciaglaw1@aol.com,
Cc: richardglanton3@gmail.com, dhenkin@henkinlaw.com,
Subject: PTNI
Date: Tue, May 17, 2022 3:24 pm

Philadelphia Television Network, Inc. s (PTNI) is in litigation in the Court of Common Pleas in Philadelphia to have its CC broadcast license returned from a temporary receiver. The CC license is a low power television station license for the Philadelphia area.

PTNI and Richard Glanton are co-defendants in court litigation in the Superior Court of California, County of range.

PTNI believes the litigation can be resolved successfully with the next 5- months and, if successful, PTNI intends to sell the license on the open market to a third party. Based on recent market comparable transactions, the license should be valued in excess of \$1.5 million.

Steven G. Par

-215-54 -8585

C-215-808-4714

www.dsppartners.com

EXHIBIT D



Federal Communications Commission
Washington, D.C. 20554

August 11, 2021

Joseph Bernstein
2220 Fairmont Ave.
Philadelphia, PA 19130
JBERNSTEIN@SPINACPA.COM
(via electronic mail)

Re: Request for Tolling
WEFG-LD, Philadelphia, PA
Facility ID No. 167606
LMS File No. 0000150231

Dear Licensee,

On June 15, 2021, Joseph Bernstein (Bernstein), formerly the court-appointed temporary receiver and the current licensee of low power television station WEFG-LD, Philadelphia, Pennsylvania (WEFG-LD or Station), filed the above-referenced request for tolling of the Station's displacement construction permit (Displacement CP) expiration date. For the reasons below, we grant Bernstein's request and toll the expiration date of the Displacement CP for 660 days from the date of final action on the litigation concerning ownership of the Station.

Background. Pursuant to section 73.3700(b)(5) of the Commission's rules (Rules), a station that was assigned a new channel as a result of the Commission's incentive auction and repacking process may request a single extension of its construction permit deadline of up to 180 days to complete construction of its post-auction facility.¹ All subsequent requests for additional time to construct are subject to the Commission's tolling provisions of section 73.3598(b) of the Rules.² The Commission's tolling provisions provide that a construction permit deadline may be tolled under specific circumstances such as acts of God, delays due to administrative or judicial review, or construction that is delayed by any cause of action pending before a court of competent jurisdiction relating to any necessary local, state, or federal requirement for the construction or operation of the station, including any zoning or environmental requirement.³

As part of the Incentive Auction repacking process, WEFG-LD's pre-auction channel 48 was displaced. The Station's then owner Philadelphia Television Network, Inc. (PTNI) filed for and on August 15, 2018, was granted the Displacement CP for channel 21 that expires August 15, 2021.⁴ Subsequent to the grant of the Displacement CP, the Station's ownership became the subject of litigation. On November 20, 2018, an application for involuntary assignment of the WEFG-LD license to Bernstein, as receiver, was filed⁵ and subsequently granted. PTNI sought reconsideration of the grant of the application which remains pending before the Commission. Litigation over ownership of WEFG-LD was initiated in both California and Pennsylvania state courts and remains pending as well. Bernstein explains

¹ See 47 CFR § 73.3700(b)(5).

² See 47 CFR § 73.3700(b)(5)(i) citing 47 CFR § 73.3598(b).

³ *Id.*

⁴ See LMS File No. 0000053972.

⁵ See CDBS File No. 20181120AAT.

that, on October 24, 2019, a Philadelphia court vacated its order appointing Bernstein, and removed him as receiver, 435 days into the three-year construction period.⁶ Bernstein maintains that he remains the licensee of WCFG-LD with legal obligations and liabilities to third parties to preserve WCFG-LD's assets, but no longer with court-appointed authority to legally take actions regarding the Station. Because ownership of the station is still being litigated, neither Bernstein nor any other party was able to take any actions to construct the Displacement CP facilities for the remaining 660 days of the three-year construction period. Therefore, pursuant to Section 73.3598(b)(ii) of the rules, Bernstein requests that the expiration date of its construction permit be tolled for 660 days following final resolution of the litigation resolving ownership of the Station.

Bernstein argues that tolling of the Displacement CP expiration date is warranted. Bernstein notes that section 73.3598 of the Commission's rules permits tolling in certain circumstances, expressly including during administrative or judicial reviews, including where "construction is delayed by any cause of action pending before any court of competent jurisdiction."⁷ Bernstein argues that the ongoing litigation related to WCFG-LD and the Commission administrative review of the petition for reconsideration proceeding before the Commission constitute just such an action. Once the court that appointed Bernstein as temporary receiver vacated its receiver appointment order, Bernstein argues that he no longer had legal authority (nor any source of funds) to take any action as a receiver to construct the permanent facilities authorized by the Displacement CP, nor could any other party construct the facilities while he technically remained the licensee of the Station. Despite this fact, Bernstein has continued to have certain legal obligations and liabilities to third parties (including former licensee PTNI) to preserve the value of the WCFG-LD asset. For example, he has continued to extend the outstanding engineering STA through which the Station continues to temporarily operate on channel 21.⁸

Finally, Bernstein argues that a grant of his tolling request would also serve the public interest by helping preserve the WCFG-LD station asset for the benefit of the party ultimately found to be the lawful licensee and by preserving an LPTV service licensed to Philadelphia, Pennsylvania.

Discussion. Upon review of the facts and circumstances presented, we find that sufficient circumstances exist to toll the expiration date of the Station's construction permit.⁹ Bernstein was prevented from conducting further construction of the Station's displacement facilities because of a court order issued in the proceeding involving the dispute over ownership of the Station. Bernstein took steps to preserve the station's license by ensuring that a temporary facility was constructed and continues to operate. Until the litigation involving the Station's ownership is resolved and a final decision rendered, neither Bernstein nor the prevailing party will be able to take the necessary steps to complete construction

⁶ See Order, October 24, 2019, Philadelphia County Court of Common Pleas, Case No. 000074.

⁷ See 47 CFR § 73.3598(b)(2). Bernstein argues that Commission has expressly interpreted Section 73.3598(b)(2) of the rules to include circumstances where a new broadcast station could not be built due to a pending bankruptcy proceeding. See Letter to Fireweed Communications, LLC from Barbara A. Kreisman, Chief, Video Division, October 15, 2010; and Letter to WWAZ License, LLC and KDMI License, LLC from Barbara A. Kreisman, Chief Video Division, June 13, 2012). Bernstein argues that the temporary receivership in this case presents similar issues as an authorization being held by a bankruptcy trustee particularly where, as here, the temporary receivership has been vacated.

⁸ See LMS File No. 0000150012.

⁹ 47 CFR § 73.3598(b).

of the Station's permanent facilities. We conclude that the public interest will be served by tolling of the Station's construction permit.

We remind Bernstein that, pursuant to the Reimbursement Expansion Act, the Station is eligible for reimbursement from the TV Broadcast Relocation Fund (Fund) of costs reasonably incurred as a result of the reorganization of broadcast television spectrum.¹⁰ Please note, however, that additional expenses incurred, such as those resulting from changes in a Station's plans to construct their displacement facilities that are unrelated to the displacement, may not be eligible for reimbursement from the Fund.

We further remind Bernstein that the deadline for submitting final expense documentation for reimbursement for the Station is September 5, 2022.¹¹ Thus, we strongly encourage the Station to diligently pursue completion of the current deadlines to improve the likelihood that there will be sufficient funds available to reimburse Bernstein for its legitimate expenses, and we encourage Bernstein to submit eligible invoices as soon as practicable.

The above facts considered, Joseph Bernstein's request for tolling **IS GRANTED**. The construction permit (LMS File No. 0000053972) for WFGD-LD, Philadelphia, Pennsylvania, **IS TOLLED for 660 days from the date of final judicial action resolving ownership of the station**. Bernstein **MUST NOTIFY** the Chief, of the Video Division, Media Bureau, in writing within 10 days following final judicial action, at which time the Station's construction permit will be re-issued with an updated expiration date. We also remind Bernstein that any subsequent requests for tolling of its construction permit deadline will be subject to the Commission's tolling provisions.¹²

Sincerely,

/s/

Barbara A. Kreisman
Chief, Video Division
Media Bureau

cc (via electronic mail): Kathleen Victory, Esq.

¹⁰ See *Consolidated Appropriations Act, 2018*, Pub. L. 115-141, at Division E, Title V, § 511, 132 Stat. 348 (2018) (codified at 47 U.S.C. § 1452(j)-(n)). See also 47 CFR § 73.3701 (Reimbursement Under the Reimbursement Expansion Act); *LPTV, TV Translator, and FM Broadcast Station Reimbursement; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 34 FCC Rcd 1690 (2019); and *LPTV, TV Translator, and FM Broadcast Station Reimbursement; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Notice of Proposed Rulemaking and Order, 33 FCC Rcd 7855 (2018).

¹¹ See *Invoice Filing Deadlines for TV Broadcaster Relocation Fund*, Public Notice, 35 FCC Rcd 11273, 11277, paras. 10-11 (IATF/MB 2020) (setting three filing deadlines for the submission of all outstanding repack invoices, notably: 1) October 8, 2021 for eligible entities assigned repack transition completion dates in the first half of the 39-month post-auction transition period; 2) March 22, 2022 for entities assigned completion dates in the second half of the transition period; and 3) September 5, 2022 for all other participants in the reimbursement program).

¹² See 47 CFR § 73.3598(b).

Certificate of Service

The undersigned, an employee of Newport Investment Group, LLC., hereby certifies that a true copy of the foregoing “MOTION FOR LEAVE AND SIXTH SUPPLEMENT TO OPPOSITION TO PETITION FOR RECONSIDERATION AND TO UPDATE RECORD” was served this date, by U.S. Postal Service First Class mail, postage prepaid, or via electronic mail to those designated with an asterisk, upon the following:

Barbara Kreisman
David Brown
Hossein Hashemzadeh

Jeffrey L. Timmons, Esq.
974 Branford Lane NW
Lilburn, GA 30047-2680

Kathleen Victory, Esq.
Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street, Suite 1100
Arlington, Virginia 22209
FCC Counsel to Joseph Bernstein

By:  _____

June 1, 2022