

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)	
WFGD-LD, Philadelphia, Pennsylvania, to)	
Joseph Bernstein, as Receiver)	

To: Secretary
Attention: Video Division, Media Bureau

REQUEST FOR LEAVE TO FILE
THIRD SUPPLEMENT TO OPPOSITION
TO PETITION FOR RECONSIDERATION TO UPDATE RECORD

Joseph Bernstein, duly appointed Receiver (“Receiver”) by the Philadelphia County Court of Common Pleas and FCC approved Licensee of the above-captioned Low Power Television Station WFGD-LD, Philadelphia, Pennsylvania (the “Station”), by and through his attorneys pursuant to Section 1.429(d) of the Commission’s Rules, 47 C.F.R. § 1.429(d), respectfully submits its Request for Leave to submit this Third Supplement (“Third Supplement”) to his opposition to the petition for reconsideration (the “Petition”) filed by Philadelphia Television Network, Inc. (“PTN”), a minority shareholder (Eugene Cliett) of PTNI, and DSP Investors, LLC, which Receiver believes is a former lender (“Petitioners”) in order to provide the Commission with important new information relevant to the FCC’s consideration of the Petition: two (2) Orders entered by the Philadelphia Court of Common Pleas on August 27, 2019 in which the **Stay** imposed by the Court’s prior Order January 22, 2019 is **Vacated** and **Lifted** as to Judgment Debtors Philadelphia Television Network and Richard H. Glanton.

These matters represent significant new information now presented to the Commission and the

grounds for which this Request for Leave to file this Third Supplement is requested.

Respectfully submitted,

JOSEPH BERSTEIN, COURT APPOINTED
RECEIVER

By 
Kathleen Victory
His Attorney

September 6, 2019
Fletcher, Heald & Hildreth, P.L.C.
1300 N. 17th Street, Suite 1100
Arlington, VA 22209
(703) 812-0400

Certificate of Service

The undersigned, an employee of Fletcher, Heald & Hildreth, P.L.C., hereby certifies that a true copy of the foregoing "REQUEST FOR LEAVE" 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

September 6, 2019



Name