

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

In Re: Application of)	
)	
Philadelphia Television Network, Inc.)	File No. BALDTL-20181120AAT
)	Facility ID No. 167606
For Consent to an Involuntary)	
Assignment of License of)	
Low Power Television Station)	
WEFG-LD, Philadelphia, Pennsylvania, to)	
Joseph Bernstein, as a Receiver)	

Attention: Video Division, Media Bureau

MOTION FOR LEAVE TO FILE EIGHTH SUPPLEMENT

Philadelphia Television Network, Inc. (“PTNI”), Eugene L. Cliett, an officer, director and shareholder of PTNI (“Cliett”), and DSP Investors, LLC, a secured creditor of PTNI (“DSP”, and together with PTNI and Cliett, the “Petitioners”), by their counsel, and pursuant to Section 1.41 of the Commission’s rules, 47 C.F.R. § 1.41, respectfully submits this Motion for Leave to File Eighth Supplement (“Motion for Leave”), to supplement the record related to Petitioner’s Petition for Reconsideration (the “Petition”)¹ of the grant of the above-captioned Form 316 application (File

¹ The Petition was electronically filed by the Petitioners on December 21, 2018, and supplemented by a Supplement to Petition for Reconsideration filed on January 2, 2019 (the “First Supplement”), and further supplemented by a Second Supplement to Petition for Reconsideration filed on January 28, 2019 (the “Second Supplement”). The First Supplement and Second Supplement were filed by Petitioners as a matter of right, within the time period required for filing a petition for reconsideration under Section 1.106(f) of the Commission’s rules, 47 C.F.R. § 1.106(f). See Second Supplement at ¶ 4 and n.4. A Third Supplement to Petition for Reconsideration (the “Third Supplement”), along with a Motion for Leave to File Third Supplement, were filed by Petitioners on October 28, 2019; a Fourth Supplement to Petition for Reconsideration (the “Fourth Supplement”), along with a Motion for Leave to File Fourth Supplement, were filed by Petitioners on December 10, 2019; a Fifth Supplement to Petition for Reconsideration (the “Fifth Supplement”), along with a Motion for Leave to File Fifth Supplement, were filed by Petitioners on October 30, 2020; a Sixth Supplement to Petition for Reconsideration (the “Sixth Supplement”), along with a Motion for Leave to File Sixth Supplement, were filed by Petitioners on February 15, 2021, and a Seventh Supplement to Petition for Reconsideration (the “Seventh Supplement”), along with a Motion for Leave to File Seventh Supplement, were filed by Petitioners on April 15, 2021.

No. BALDTL-20181120AAT, the “Application”) for Federal Communications Commission (“FCC”) consent to the involuntary assignment of the license of Low Power Television (“LPTV”) broadcast station WCFG-LD, Philadelphia, Pennsylvania (Facility ID No. 167606, “WCFG”), to Joseph Bernstein (“Bernstein”), as a temporary receiver, to advise the Commission of relevant recent orders by courts in California and Pennsylvania (as well as of other filings or documents) which leave no legal basis for the Commission to delay its consent to removing Bernstein and restoring PTNI as FCC licensee of WCFG.

Considering this Eighth Supplement would serve the public interest by updating the record in this proceeding, and allowing the Commission to take prompt action to grant the Petition now that all issues and arguments raised in opposition to the Petition have been fully resolved by the appropriate courts, and are now moot. Therefore, Petitioners request that the Commission accept and consider the Eighth Supplement. so that the Commission has a complete record in this proceeding.

Wherefore, the premises set forth above in this Motion for Leave being considered, Petitioners respectfully request that the Commission grant this Motion for Leave, accept and consider the Eighth Supplement being filed by Petitioners on this same date, and based on the Receiver Removal Order previously submitted to the Commission as well as all other information Petitioners have presented to the Commission in this proceeding, promptly grant the Petition, reinstate and then dismiss or deny the Application, and immediately reinstate PTNI as the proper FCC licensee of WEEG.

Respectfully submitted,

**Philadelphia Television Network, Inc.,
Eugene L. Cliett, and DSP Investors, LLC**

A handwritten signature in black ink, appearing to read "Jeffrey L. Timmons", written over a horizontal line.

By: _____
Jeffrey L. Timmons, Esq.
Their Attorney

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July 20, 2021 (electronically filed in CDBS)

CERTIFICATE OF SERVICE

I, Jeffrey L. Timmons, hereby certify that on this 20th day of July, 2021, a copy of the foregoing “Motion for Leave to File Eighth Supplement” has been served by United States first class or priority mail, postage prepaid and mailed on the pleading filing date, upon the following:

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