

1 Charles P. Maher, State Bar No. 124748
DENTONS US LLP
2 One Market Plaza
Spear Tower, 24th Floor
3 San Francisco, California 94105
Telephone No.: 415-267-4000
4 Fax No.: 415-267-4198
E-mail: charles.maher@dentons.com

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6 Counsel for John W. Richardson
Trustee in Bankruptcy

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8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 In re
12 PATAPHYSICAL BROADCASTING
FOUNDATION, INC., a California Non-Profit
13 Corporation dba KUSP 88.9 FM,
14 Debtor.

Case No. 16-52317 DM
Chapter 7

15
16 **DECLARATION OF JOHN CRIGLER**

17 I, John Crigler, declare as follows:

18 1. I am an owner in the law firm Garvey Schubert Barer and am licensed to practice in
19 the District of Columbia. I am a member of the Federal Communications Bar Association and
20 practice primarily before the Federal Communications Commission.

21 2. Before the Debtor filed its voluntary Chapter 7 petition, Garvey Schubert Barer
22 provided it with services relating to licenses issued to it by the Federal Communications
23 Commission and regulations under which a non-profit entity may operate a radio station.

24 3. At the time the Debtor filed its voluntary Chapter 7 petition, my firm was owed
25 approximately \$12,650. I understand from the Trustee that my firm may file a proof of claim in
26 the bankruptcy case for amounts owed. I further understand that nothing in this declaration or the
27 Trustee's application for an order authorizing him to employ my firm will affect that claim in any
28 way and that the Trustee will examine that claim and other claims on file in the case and, if he

1 deems appropriate, may object to it.

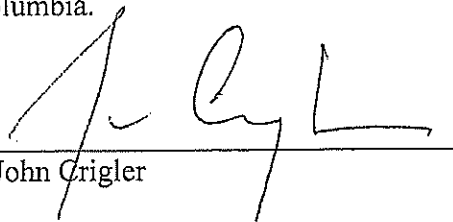
2 4. When the Debtor filed its Chapter 7 petition and the bankruptcy estate was created,
3 the license was "involuntarily" transferred to the Trustee. An application must be submitted to the
4 Federal Communications Commission to obtain its consent for the transfer of license to the
5 Trustee.

6 5. It is my understanding that the Debtor's broadcast license has value for the
7 bankruptcy estate and that the Trustee intends to sell it and possibly other assets for the benefit of
8 creditors. The transfer of a license from the Trustee to a new licensee would also require FCC
9 approval.

10 6. I have many years of experience dealing with the Federal Communications
11 Commission, and am very familiar with its practices and procedures. Furthermore, I have
12 represented the Debtor since 2000 at Garvey Schubert Barer and since 1981 at my prior firm. I
13 also represent many other licensees of noncommercial radio stations.

14 7. I have reviewed the mailing matrix filed by counsel for the Debtor and declare that,
15 in addition to my representation of the Debtor in matters relating to the Federal Communications
16 Commission and its broadcast license, I have represented two of the listed creditors, Public Media
17 Company and Pacifica Foundation, on other matters. I have not, however, represented Public
18 Media Company or Pacifica Foundation, their attorneys or accountants, the United States Trustee
19 or any person employed with the office of the United States Trustee, in connection with their
20 relationship with Debtor.

21 I declare under penalty of perjury that the above statements are true and that if called as a
22 witness I could and would testify to their truthfulness. This declaration is executed on the 29th day
23 of August 2016 in Washington, District of Columbia.

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26 John Crigler
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