

UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

In re:

**BLACK CROW MEDIA
GROUP, LLC, et al.,¹**

Debtors.

**CASE NO.: 3:10-bk-00172-PMG
CHAPTER 11**

Jointly Administered

UNITED STATES TRUSTEE’S LIMITED OBJECTION TO DEBTORS’ APPLICATION TO
EMPLOY AND RETAIN EDINGER ASSOCIATES AS SPECIAL CORPORATE AND
TRANSACTIONAL COUNSEL TO THE DEBTORS PURSUANT TO 11 U.S.C. § 327(E)

COMES NOW, Donald F. Walton, United States Trustee for Region 21, and files this Limited Objection to the Debtors’ Application to Employ and Retain Edinger Associates as Special Corporate and Transactional Counsel to the Debtors Pursuant to 11 U.S.C. § 327(e) (Docket No.: 69) (hereinafter, the “Application”), and in support thereof states:

1. The Debtors filed this case on January 12, 2010.
2. On January 22, 2010, the Court entered the Order Authorizing Joint

Administration of these cases (Docket No.: 50).

3. The Debtors filed the Application on February 1, 2010, and the Court scheduled the hearing on the Application for February 18, 2010. Although the Debtors filed a Motion for Entry of a Case Management Order (Docket No.: 10), which would establish omnibus hearing dates and associated deadlines regarding various pleadings, no Order has been entered to date.

¹ The Debtors in these chapter 11 cases are: (i) Black Crow Media Group, LLC (“Black Crow Group”); (ii) Black Crow Media, LLC (“Black Crow Media”); (iii) Black Crow Broadcasting, Inc. (“Black Crow Broadcasting”); (iv) Black Crow Radio, LLC (“Black Crow Radio”); (v) Radio City Broadcasting, LLC (“Rocket City”); (vi) BCA Radio, LLC (“BCA Radio”); (vii) Black Crow Media of Valdosta, LLC (“Valdosta”); (viii) RTG Radio, LLC (“RTG Radio”); (ix) Thomas Media Operations, LLC (“Thomas Media”); (x) Thomas Radio, LLC (“Thomas Radio”); (xi) Rainbow Media, Inc. (“Rainbow Media”); and (xii) Thomas Media, Inc. (TMI).

4. The United States Trustee has not yet appointed an official committee of unsecured creditors, but intends to do so shortly, based upon sufficient interest demonstrated by unsecured creditors.

5. The Application requests that the Court enter an Order authorizing the Debtors to employ and retain Edinger Associates (hereinafter, "Edinger") for special corporate matters.

6. The United States Trustee files this limited objection because neither the Application nor the attached proposed Order describes how Edinger's services and/or fees will be divvied among the several Debtors. As these cases are not substantively consolidated, these Debtors have different creditors, and some of the Debtors may not require Edinger's services.

7. The United States Trustee asserts that in order to foster full and complete disclosure, and also to afford the several Debtors' creditors opportunity to fully evaluate the necessity and value of Edinger's services, the Debtors should be required to describe how Edinger will disclose A) the amount of work done for each Debtor, and B) the value of the services performed for each Debtor.

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WHEREFORE, based upon the foregoing, the United States Trustee respectfully requests that the Court refrain from approving the Application until the foregoing matters are addressed and resolved, and grant such other and further relief as is just and appropriate.

DATED: February 11, 2010

RESPECTFULLY SUBMITTED

DONALD F. WALTON
United States Trustee
Region 21

/s/ Timothy S. Laffredi
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished electronically or by U.S. Mail first class postage prepaid on February 11, 2010 to:

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