Docket #0002 Date Filed: 3/5/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	)	Chapter 11
CUMULUS MEDIA INC.,	)	Case No. 26-90346 (ARP)
Debtor.	)	
Tax I.D. No. 82-5134717	)	
In re:	)	Chapter 11
ATLANTA RADIO, LLC	)	Case No. 26-90347 (ARP)
Debtor.	)	
Tax I.D. No. 33-1065242	)	
In re:	)	Chapter 11
BROADCAST SOFTWARE INTERNATIONAL LLC	)	Case No. 26-90348 (ARP)
Debtor.	)	
Tax I.D. No. 36-4319376	)	
In re:	)	Chapter 11
CATALYST MEDIA, LLC	)	Case No. 26-90349 (ARP)
Debtor.	)	
Tax I.D. No. 36-4698849	)	
In re:	)	Chapter 11
CHICAGO FM RADIO ASSETS, LLC	)	Case No. 26-90351 (ARP)
Debtor.	)	
Tax I.D. No. 75-3228146	)	

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In re:	)	Chapter 11
CHICAGO RADIO ASSETS, LLC	)	Case No. 26-90353 (ARP)
Debtor.	)	
Tax I.D. No. 20-4218565	)	
In re:	)	Chapter 11
CMI RECEIVABLES FUNDING LLC	)	Case No. 26-90355 (ARP)
Debtor.	)	
Tax I.D. No. 46-4186396	)	
In re:	)	Chapter 11
CMP KC LLC	)	Case No. 26-90357 (ARP)
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Tax I.D. No. 20-4531244	)	
In re:	)	Chapter 11
CMP SUSQUEHANNA LLC	)	Case No. 26-90359 (ARP)
Debtor.	)	
Tax I.D. No. 20-4531045	)	
In re:	)	Chapter 11
CMP SUSQUEHANNA RADIO HOLDINGS LLC	)	Case No. 26-90362 (ARP)
Debtor.	)	
Tax I.D. No. 20-4530834	)	
In re:	)	Chapter 11
CONSOLIDATED IP COMPANY LLC	)	Case No. 26-90350 (ARP)
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Tax I.D. No. 46-4077527	)	

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Tax I.D. No. 68-0575090	)	
In re:	)	Chapter 11
CUMULUS INTERMEDIATE HOLDINGS LLC	)	Case No. 26-90358 (ARP)
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Tax I.D. No. 51-0405729	)	
In re:	)	Chapter 11
CUMULUS MEDIA INTERMEDIATE INC.	)	Case No. 26-90363 (ARP)
Debtor.	)	
Tax I.D. No. 82-5155644	)	
In re:	)	Chapter 11
CUMULUS MEDIA INVESTMENTS LLC	)	Case No. 26-90365 (ARP)
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Tax I.D. No. 84-2740693	)	
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CUMULUS MEDIA NEW HOLDINGS INC.	)	Case No. 26-90369 (ARP)
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CUMULUS NETWORK HOLDINGS LLC	)	Case No. 26-90372 (ARP)
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In re:	)	Chapter 11
CUMULUS RADIO HOLDING COMPANY LLC	)	Case No. 26-90376 (ARP)
Debtor.	)	
Tax I.D. No. 93-3340301	)	
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CUMULUS RADIO LLC	)	Case No. 26-90379 (ARP)
Debtor.	)	
Tax I.D. No. 86-0703641	)	
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CUMULUS TEXAS, LLC	)	Case No. 26-90345 (ARP)
Debtor.	)	
Tax I.D. No. 41-4111085	)	
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DC RADIO ASSETS, LLC	)	Case No. 26-90381 (ARP)
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Tax I.D. No. 20-4218609	)	
In re:	)	Chapter 11
DETROIT RADIO, LLC	)	Case No. 26-90352 (ARP)
Debtor.	)	
Tax I.D. No. 33-1065244	)	
In re:	)	Chapter 11
DIAL COMMUNICATIONS GLOBAL MEDIA, LLC	)	Case No. 26-90360 (ARP)
Debtor.	)	
Tax I.D. No. 02-0586001	)	

In re:	)	Chapter 11
INCENTREV LLC	)	Case No. 26-90366 (ARP)
Debtor.	)	
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INCENTREV-RADIO HALF OFF, LLC	)	Case No. 26-90373 (ARP)
Debtor.	)	
Tax I.D. No. 46-3208500	)	
In re:	)	Chapter 11
KLIF BROADCASTING, LLC	)	Case No. 26-90378 (ARP)
Debtor.	)	
Tax I.D. No. 23-2877208	)	
In re:	)	Chapter 11
KLOS-FM RADIO ASSETS, LLC	)	Case No. 26-90383 (ARP)
Debtor.	)	
Tax I.D. No. 20-4218888	)	
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LA RADIO, LLC	)	Case No. 26-90385 (ARP)
Debtor.	)	
Tax I.D. No. 20-4222471	)	
In re:	)	Chapter 11
MINNEAPOLIS RADIO ASSETS, LLC	)	Case No. 26-90384 (ARP)
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In re:	)	Chapter 11
NY RADIO ASSETS, LLC	)	Case No. 26-90382 (ARP)
Debtor.	)	
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In re:	)	Chapter 11
RADIO ASSETS, LLC	)	Case No. 26-90380 (ARP)
Debtor.	)	
Tax I.D. No. 20-5314240	)	
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RADIO METROPLEX, LLC	)	Case No. 26-90356 (ARP)
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RADIO NETWORKS, LLC	)	Case No. 26-90361 (ARP)
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Tax I.D. No. 20-4222557	)	
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SAN FRANCISCO RADIO ASSETS, LLC	)	Case No. 26-90367 (ARP)
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SUSQUEHANNA MEDIA LLC	)	Case No. 26-90370 (ARP)
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Tax I.D. No. 23-2722964	)	

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SUSQUEHANNA PFALTZGRAFF LLC	)	Case No. 26-90375 (ARP)
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Debtor.	)	
Tax I.D. No. 23-1139608	)	
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SUSQUEHANNA RADIO LLC	)	Case No. 26-90377 (ARP)
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Debtor.	)	
Tax I.D. No. 23-2381976	)	
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In re:	)	Chapter 11
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WBAP-KSCS ASSETS, LLC	)	Case No. 26-90374 (ARP)
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Debtor.	)	
Tax I.D. No. 20-4227103	)	
	)	
In re:	)	Chapter 11
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WESTWOOD ONE, LLC	)	Case No. 26-90371 (ARP)
	)	
Debtor.	)	
Tax I.D. No. 95-3980449	)	
	)	
In re:	)	Chapter 11
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WESTWOOD ONE RADIO NETWORKS, LLC	)	Case No. 26-90368 (ARP)
	)	
Debtor.	)	
Tax I.D. No. 84-0905591	)	
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In re:	)	Chapter 11
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WPLJ RADIO, LLC	)	Case No. 26-90364 (ARP)
	)	
Debtor.	)	
Tax I.D. No. 20-4222424	)	

DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER (I) DIRECTING JOINT ADMINISTRATION OF RELATED CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF

Emergency relief has been requested. Relief is requested not later than 2:00 p.m. (prevailing Central Time) on March 5, 2026.

If you object to the relief requested or you believe that emergency consideration is not warranted, you must appear at the hearing if one is set, or file a written response prior to the date that relief is requested in the preceding paragraph. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

A hearing will be conducted on this matter on March 5, 2026 at 2:00 p.m. (prevailing Central Time) in Courtroom 400, 4th Floor, 515 Rusk Avenue, Houston, Texas 77002. Participation at the hearing will only be permitted by an audio and video connection.

Audio communication will be by use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Perez's conference room number is 282694 . Video communication will be by use of the GoTo platform. Connect via the free GoTo application or click the link on Judge Perez's home page. The meeting code is "Judge Perez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your appearance, click the "Electronic Appearance" link on Judge Perez's home page. Select the case name, complete the required fields and click "submit" to complete your appearance.

The above-captioned debtors and debtors in possession (collectively, the "Debtors") respectfully state as follows in support of this motion:

Relief Requested

1. The Debtors seek entry of an order, substantially in the form attached hereto (the "Order"), (a) authorizing the Debtors to jointly administer their chapter 11 cases for procedural purposes only and (b) granting related relief. The Debtors request that the United States Bankruptcy Court for the Southern District of Texas (the "Court") maintain one file and one docket for all of the jointly administered cases under the case of Cumulus Media Inc., and that the cases be administered under a consolidated caption, as follows:

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	)	
	)	Chapter 11
CUMULUS MEDIA INC., *et al.*,[1]	)	
	)	Case No. 26-90346 (ARP)
	)	
Debtors.	)	(Jointly Administered)
	)	

[1] A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at www.veritaglobal.net/cumulusmedia. The Debtors' service address for purposes of these chapter 11 cases is: 780 Johnson Ferry Road, N.E., Suite 500, Atlanta, Georgia 30342.

2. The Debtors further request that the Court order that the foregoing caption satisfies the requirements set forth in section 342(c)(1) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq*. (the "Bankruptcy Code"). The Debtors also request that a docket entry, substantially similar to the following, be entered on the docket of each of the Debtors, other than Cumulus Media Inc., to reflect the joint administration of these chapter 11 cases:

> An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District of Texas, directing joint administration of the chapter 11 cases of: Cumulus Media Inc., *et al.* Case No. 26-90346 (ARP). **All further pleadings and other papers shall be filed in and all further docket entries shall be made in Case No. 26-90346 (ARP). The docket in Case No. 26-90346 (ARP) should be consulted for all matters affecting this case.**

Jurisdiction and Venue

3. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of Texas*, dated May 24, 2012 (the "Amended Standing Order"). This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b). The Debtors confirm their consent to the entry of a final order by the Court in connection with this motion.

4. Venue is proper pursuant to 28 U.S.C. § 1408.

5. The statutory bases for the relief requested herein are sections 342(c), 101(2), and 105(a) of the Bankruptcy Code, rules 1005 and 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), rules 1015-1 and 9013-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "Bankruptcy Local Rules"), and the Procedures for Complex Cases in the Southern District of Texas (the "Complex Case Procedures").

Background

6. On March 4, 2026 (the "Petition Date"), the Debtors commenced filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their business and managing their properties as debtors in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in these chapter 11 cases, and no official committees have been appointed or designated.

7. A detailed description of the Debtors and their business, including the facts and circumstances giving rise to these chapter 11 cases, is set forth in the *Declaration of Francisco J. Lopez-Balboa in Support of Chapter 11 Petitions and First Day Motions* (the "First Day Declaration"), filed contemporaneously herewith and incorporated herein by reference.[1]

Basis for Relief

8. Bankruptcy Rule 1015(b) provides, in pertinent part, that "[t]he court may order joint administration of the estates . . . pending in the court if they are brought by or against . . . a debtor and an affiliate." Fed. R. Bankr. P. 1015(b)(1). The Debtors that commenced these chapter

[1] Capitalized terms used but not defined in this motion have the meanings ascribed to them in the First Day Declaration.

11 cases are "affiliates" as that term is defined in section 101(2) of the Bankruptcy Code. *See* 11 U.S.C. § 101(2). Further, Bankruptcy Local Rule 1015-1 provides additional authority for the Court to order joint administration of the chapter 11 cases. *See* Bankruptcy Local Rule 1015-1 (stating the procedure for filing motions and proposed orders for joint administration).

9. In addition, section 105(a) of the Bankruptcy Code provides the Court with the power to grant the relief requested herein by permitting the Court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a). Accordingly, the Bankruptcy Rules, the Bankruptcy Code, and the Bankruptcy Local Rules authorize the Court to grant the relief requested herein.

10. Joint administration of these chapter 11 cases will provide significant administrative convenience without harming the substantive rights of any party in interest. Many of the motions, hearings, and orders in these chapter 11 cases will affect each of the Debtors. The entry of an order directing joint administration of these chapter 11 cases will reduce fees and costs by avoiding duplicative filings and objections. Joint administration will also allow the Office of the United States Trustee for the Southern District of Texas (the "U.S. Trustee") and all parties in interest to monitor these chapter 11 cases with greater ease and efficiency.

11. Bankruptcy Rule 2002(n) provides that notices under Bankruptcy Rule 2002 shall include certain information, including, without limitation, the tax identification number of each Debtor and any other names used by the Debtor in the previous eight years. Fed. R. Bankr. P. 2002(n). All pleadings filed and each notice mailed by the Debtors will include a footnote notifying parties in interest of the address of the Debtors' headquarters and that a listing of all the Debtors and the last four digits of their tax identification numbers are publicly available on a website to be maintained by Kurtzman Carson Consultants, LLC d/b/a Verita Global

(the "Debtors' Restructuring Website"). Moreover, the full tax identification numbers, if applicable, and any other names used by the Debtors in the past eight years will be listed in the petitions for each Debtor, and such petitions are publicly available to all parties in interest, including on the Debtors' Restructuring Website. Therefore, the Debtors submit that the policies behind the requirements of Bankruptcy Rule 2002(n) have been satisfied.

12. To the extent not satisfied or deemed satisfied, waiver of the requirements imposed by section 342(c)(1) of the Bankruptcy Code or Bankruptcy Rule 2002(n) is warranted. Including the Debtors' tax identification numbers and other identifying information on each notice and pleading would be unduly cumbersome, and may be confusing to parties in interest. More importantly, waiver of such requirement is purely procedural in nature and will not affect the rights of parties in interest.

13. Further, Bankruptcy Local Rule 1015-1 details the information a debtor must include in its request for joint administration. A motion and proposed order for joint administration must "itemize the requested relief," "be in the form published on the court's website," and "be made to the judge with the lowest case number." This motion and the Order satisfy these requirements. To the extent that this motion or the Order are deemed not to comply with such rule, the Debtors request a limited waiver.

14. For the reasons set forth above, the Debtors respectfully submit that the relief requested herein is in the best interests of the Debtors, their estates, their creditors, and other parties in interest and, therefore, should be granted.

Emergency Consideration

15. Pursuant to Bankruptcy Local Rule 9013-1(i), the Debtors respectfully request emergency consideration of this motion. As set forth above and in the First Day Declaration, the Debtors believe an immediate and orderly transition into chapter 11 is critical to their ability to

reorganize successfully, and that the immediate entry of an order providing for the joint administration of these chapter 11 cases will maximize efficiency and minimize confusion in these cases. Any delay in granting the relief requested would have the opposite effect and could cause immediate and irreparable harm. Accordingly, the Debtors respectfully request that the Court grant the requested relief on an emergency basis.

Notice

16. The Debtors will provide notice of this motion to the following parties or their respective counsel: (a) the U.S. Trustee; (b) the holders of the 30 largest unsecured claims against the Debtors (on a consolidated basis); (c) Reimer & Braunstein LLP and FBT Gibbons LLP, co-counsel to the ABL Agent; (d) Gibson, Dunn & Crutcher LLP, counsel to the Ad Hoc Group; (e) counsel to the 2026 Trustee and the 2029 Trustee; (f) counsel to the 2026 Agent and the 2029 Agent; (g) the Internal Revenue Service; (h) the United States Securities and Exchange Commission; (i) the United States Attorney's Office for the Southern District of Texas; (j) the office of the attorney general for the states in which the Debtors operate; (k) the Federal Communications Commission; (l) other regulatory agencies having a regulatory or statutory interest in these cases; and (m) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

17. A copy of this motion is available on (a) PACER, at https://ecf.txsb.uscourts.gov/, and (b) the website maintained by the Debtors' proposed claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at www.veritaglobal.net/cumulusmedia.

[*Remainder of page intentionally left blank*]

WHEREFORE, the Debtors respectfully request that the Court enter the proposed order, substantially in the form attached hereto, granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

March 5, 2026

Respectfully submitted,

/s/ John F. Higgins

PORTER HEDGES LLP
John F. Higgins (TX Bar No. 09597500)
M. Shane Johnson (TX Bar No. 24083263)
Megan Young-John (TX Bar No. 24088700)
James A. Keefe (TX Bar No. 24122842)
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jeiband@porterhedges.com

- and -

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Paul M. Basta (*pro hac vice* pending)
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Kyle J. Kimpler (*pro hac vice* pending)
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New York, New York 10019
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pbasta@paulweiss.com
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sharnett@paulweiss.com
slascano@paulweiss.com

Proposed Co-Counsel to the Debtors and Debtors in Possession

Certificate of Accuracy

I certify that the facts and circumstances described in the above pleading giving rise to the emergency request for relief are true and correct to the best of my knowledge, information, and belief. This statement is made pursuant to Bankruptcy Local Rule 9013-1(i).

/s/ Francisco J. Lopez-Balboa
Francisco J. Lopez-Balboa

Certificate of Service

I certify that on March 5, 2026, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ John F. Higgins
John F. Higgins

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WBAP-KSCS ASSETS, LLC	)	Case No. 26-90374 (ARP)
	)	
Debtor.	)	
Tax I.D. No. 20-4227103	)	
	)	
In re:	)	Chapter 11
	)	
WESTWOOD ONE, LLC	)	Case No. 26-90371 (ARP)
	)	
Debtor.	)	
Tax I.D. No. 95-3980449	)	
	)	
In re:	)	Chapter 11
	)	
WESTWOOD ONE RADIO NETWORKS, LLC	)	Case No. 26-90368 (ARP)
	)	
Debtor.	)	
Tax I.D. No. 84-0905591	)	
	)	
In re:	)	Chapter 11
	)	
WPLJ RADIO, LLC	)	Case No. 26-90364 (ARP)
	)	
Debtor.	)	
Tax I.D. No. 20-4222424	)	

ORDER (I) DIRECTING JOINT ADMINISTRATION OF RELATED CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF

[Relates to Docket No. __]

Upon the motion (the "Motion")[1] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") (a) authorizing the Debtors to jointly administer their chapter 11 cases for procedural purposes only and (b) granting related relief, all as more fully set forth in the Motion; and in the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and the Amended Standing Order; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. § 1408; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and that no other notice need be provided; and this Court having reviewed the Motion and the First Day Declaration and having heard the statements in support of the relief requested therein at a hearing, if any, before this Court (the "Hearing"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and this Court having determined that the relief requested in the Motion is necessary to avoid immediate and irreparable harm to the Debtors and their estates, and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

[1] Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion.

1. The chapter 11 cases are consolidated for procedural purposes only and shall be jointly administered by the Court under the case number assigned to Cumulus Media Inc., Case No. 26-90346 (ARP).

2. The following checked items are ordered:

a. ☒ All of the jointly administered cases not previously assigned to Judge Alfredo R. Perez are transferred to Judge Alfredo R. Perez.

b. ☒ One disclosure statement and plan of reorganization may be filed for all of the cases by a plan proponent.

c. ☒ Parties may request joint hearings on matters pending in any of the jointly administered cases.

d. ☒ Other: See below.

3. The caption of the jointly administered cases shall read as follows:

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	)	
	)	Chapter 11
CUMULUS MEDIA INC., *et al.*,[1]	)	
	)	Case No. 26-90346 (ARP)
	)	
Debtors.	)	(Jointly Administered)
	)	

[1] A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at www.veritaglobal.net/cumulusmedia. The Debtors' service address for purposes of these chapter 11 cases is: 780 Johnson Ferry Road, N.E., Suite 500, Atlanta, Georgia 30342.

4. The foregoing caption satisfies any applicable requirements of section 342(c)(1) of the Bankruptcy Code and Bankruptcy Rule 2002(n).

5. A docket entry, substantially similar to the following, shall be entered on the dockets of each of the Debtors other than Cumulus Media Inc.:

> An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District of Texas directing joint administration of the chapter 11 cases of: Cumulus Media Inc., *et al.* Case No. 26-90346 (ARP). **All further pleadings and other papers shall be filed in and all further docket entries shall be made in Case No. 26-90346 (ARP). The docket in Case No. 26-90346 (ARP) should be consulted for all matters affecting this case.**

6. The Debtors shall maintain, and the Clerk of the United States Bankruptcy Court for the Southern District of Texas shall keep, one consolidated docket, one file, and one consolidated service list for these chapter 11 cases.

7. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of these chapter 11 cases and this Order shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating their respective cases.

8. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion, and the requirements of Bankruptcy Rules, the Bankruptcy Local Rules, and the Complex Case Procedures are satisfied by such notice.

9. Notwithstanding any Bankruptcy Rule or Bankruptcy Local Rule to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

10. The Debtors and the Clerk of Court are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

11. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Houston, Texas
Dated: _____, 2026

ALFREDO R. PEREZ
UNITED STATES BANKRUPTCY JUDGE