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.	)	(Joint Administration Requested)
	)	(Emergency Hearing Requested)

DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS TO (A) FILE A CONSOLIDATED LIST OF CREDITORS, (B) FILE A CONSOLIDATED LIST OF THE 30 LARGEST UNSECURED CREDITORS, AND (C) REDACT CERTAIN PERSONAL IDENTIFICATION INFORMATION; (II) WAIVING OR MODIFYING THE REQUIREMENT TO FILE A LIST OF EQUITY SECURITY HOLDERS; AND (III) 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 "JudgePerez". 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.

[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.

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 (i) file a consolidated creditor matrix in lieu of submitting separate mailing matrices for each Debtor, (ii) file a consolidated list of their 30 largest unsecured creditors,[2] and (iii) redact certain personal identification information; (b) waiving or modifying the requirement to file a list of and provide notice directly to the equity security holders for Debtor Cumulus Media Inc.; and (c) granting related relief.

Jurisdiction and Venue

2. The United States Bankruptcy Court for the Southern District of Texas (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.

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

4. The statutory bases for the relief requested herein are sections 105(a), 107(b), and 521 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the "Bankruptcy Code"), rules 1007, 2002, and 9007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), rules 9013-1 and 1075-1 of the Bankruptcy Local Rules for the Southern District of Texas

[2] The Debtors intend to file a single consolidated list of the Debtors' 30 largest unsecured creditors pursuant to Section F.14(a) of the Procedures for Complex Chapter 11 Cases in 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

5. 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. The Debtors have contemporaneously filed a motion requesting procedural consolidation and joint administration of their chapter 11 cases pursuant to Bankruptcy Rule 1015(b). 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.

6. 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.[3]

Basis for Relief

I. The Chapter 11 Cases Warrant A Consolidated Creditor Matrix

7. Bankruptcy Rule 1007(a)(1) requires a debtor to file "a list containing the name and address of each entity included or to be included on Schedules D, E/F, G, and H." Fed. R. Bankr. P. 1007(a)(1). Although the list of creditors is usually filed on a debtor-by-debtor basis, the Procedures for Complex Chapter 11 Cases in the Southern District of Texas,

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

incorporated pursuant to Bankruptcy Local Rule 1075-1, allow affiliated debtors in complex chapter 11 cases to file a consolidated creditor matrix. Here, the preparation of separate lists of creditors for each Debtor would be expensive, time consuming, administratively burdensome, and of little incremental benefit. Accordingly, the Debtors respectfully request authority to file one consolidated list of creditors (the "Creditor Matrix") for all of the Debtors on the lead case docket instead of uploading a text file for each case. Submitting a Creditor Matrix in this manner avoids duplicate notice.

II. The Chapter 11 Cases Justify A Consolidated List of the 30 Largest Unsecured Creditors

8. Pursuant to Bankruptcy Rule 1007(d), a debtor shall file "a list containing the name, address and claim of the creditors that hold the 20 largest unsecured claims, excluding insiders." Fed. R. Bankr. P. 1007(d). Because a large number of creditors may be shared amongst the Debtors, the Debtors request authority to file a single, consolidated list of their 30 largest unsecured creditors (the "Top 30 List"). The Top 30 List will help alleviate administrative burdens, costs, and the possibility of duplicative service. Although they reserve the right to do so in the future, the Debtors are not requesting authority in this motion to file consolidated schedules of assets and liabilities and statements of financial affairs or substantively consolidate the Debtors.

III. Redaction of Certain Confidential Information is Appropriate

9. Section 107(c)(1) of the Bankruptcy Code provides that:

> [t]he bankruptcy court, for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual or the individual's property:
>
> (A) [a]ny means of identification . . . contained in a paper filed, or to be filed in a case under [the Bankruptcy Code].
>
> (B) [o]ther information contained in a paper described in subparagraph (A).

11. U.S.C. § 107(c)(1).

10. It is appropriate to authorize the Debtors to redact from any paper filed or to be filed with the Court in these chapter 11 cases (including the Creditor Matrix) the personally identifiable information of any natural person, including the Debtors' current and former employees, directors, creditors, and equity security holders, because, among other reasons, the publication of such information may violate United States privacy laws and could be used to perpetrate identity theft or phishing scams or to harass or stalk such individuals, exposing the Debtors to potential civil liability and significant financial penalties.

11. The risk in relation to section 107(c)(1) of the Bankruptcy Code is not merely speculative. In at least one chapter 11 case, the abusive former partner of a debtor's employee used the publicly accessible creditor and employee information filed in the chapter 11 case to track the employee at her new address that had not been publicly available until then, forcing the employee to change addresses again.[4] The disclosure of individuals' personal information, including names and home and email addresses, has the potential to result in significant harm to such individuals, including stalking and harassment from former partners, and phishing and other scams perpetrated by malicious actors.

12. In addition, privacy and data protection regulations have been enacted in a key jurisdiction in which the Debtors and their non-Debtor affiliates do business. In 2018, the state of California enacted the California Consumer Privacy Act of 2018 (the "CCPA"), which provides individuals domiciled in California the right to, among other things, request their collected personal information, including postal addresses, be deleted by entities subject to the regulation

[4] This incident is described in the "creditor matrix motion" filed in *In re Charming Charlie Holdings Inc.*, No. 19-11534 (CSS) (Bankr. D. Del. July 11, 2019) [Docket No. 4].

and opt out of the sale of personal information by such entities to third parties. Violators risk injunctions and civil penalties of up to $2,500 for each violation and up to $7,500 for each intentional violation. Cal. Civ. Code § 1798.155. The CCPA applies to all for-profit entities doing business in California ("CCPA Entities") that collect and process consumer personal data and also satisfy at least one of the following criteria: (a) has annual gross revenue in excess of $25 million; (b) buys, shares, receives, or sells the personal information of more than 50,000 consumers, households, or devices for commercial purposes; or (c) receives 50% or more of their annual revenues from selling consumers' personal information. Cal. Civ. Code § 1798.140(c)(1). The Debtors likely qualify as CCPA Entities because the Debtors' annual gross revenue exceeds $25 million.

13. For these reasons, cause exists to authorize the Debtors to redact, pursuant to section 107(c)(1) of the Bankruptcy Code, the names, home addresses, email addresses, and other personally identifiable information of all individuals or natural persons listed on the Creditor Matrix or any other document filed with the Court. Absent such relief, the Debtors would unnecessarily render individuals more susceptible to identity theft, and could jeopardize the safety of employees, directors, and individual creditors.

14. The Debtors propose to provide, upon request, an unredacted version of the Creditor Matrix (and any other filings redacted pursuant to the Order) to (a) the Court, (b) the Office of the United States Trustee for the Southern District of Texas (the "U.S. Trustee"), (c) counsel to any statutory committee appointed in these chapter 11 cases, and (d) any party in interest that represents that the unredacted list will be utilized solely for giving notice in the chapter 11 cases and otherwise maintained in confidence.

IV. Waiver or Modification of the Requirements to File a List of, and to Provide Notice Directly to, the Equity Security Holders is Warranted under the Circumstances of these Chapter 11 Cases

15. The Bankruptcy Rules contain certain requirements with respect to a debtor's equity security holders. Bankruptcy Rule 1007(a)(3) requires a debtor to file, within fourteen days after the petition date, a list of the debtor's equity security holders. Bankruptcy Rule 2002(d), in turn, requires that equity security holders be provided notice of, among other things, the commencement of the bankruptcy case and the confirmation hearing. Fed. R. Bankr. P. 2002(d). Bankruptcy courts have authority to modify or waive the requirements under both rules. Fed. R. Bankr. P. 1007(a)(3) ("[U]nless the court orders otherwise, the debtor shall file . . . a list of the debtor's equity security holders . . . ."); Fed. R. Bankr. P. 2002(d) ("[U]nless the court orders otherwise, the clerk . . . shall in the manner and form directed by the court . . . give notice to all equity security holders . . . ."); *see also* 11 U.S.C. § 105(a) ("The court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title."); Fed. R. Bankr. P. 9007 ("When notice is to be given under these rules, the court shall designate, if not otherwise specified herein, the time within which, the entities to whom, and the form and manner in which the notice shall be given.").

16. The Debtors believe that the requirements to file a list of, and to provide notice directly to, equity security holders should be waived as to Cumulus Media Inc. in these chapter 11 cases. As an initial matter, Cumulus Media Inc. is the ultimate corporate parent of the Debtors. The shares of common stock of Cumulus Media Inc. are quoted on the OTC Markets under the symbol "CMLS." However, a significant number of Cumulus Media Inc.'s outstanding shares are held through nominees and, as a result, Cumulus Media Inc. does not maintain a complete list of the beneficial holders of its equity securities. Further, the holders of such equity may have changed hands before the Petition Date. Accordingly, preparing and submitting such a list with last known

addresses for each such beneficial holder and sending notices directly to all such parties, to the extent possible, would create undue expense and administrative burden with limited corresponding benefit to the Debtors' estates or parties in interest.

17. Notwithstanding the above-referenced hurdles in noticing Debtor Cumulus Media Inc.'s equity security holders, Debtor Cumulus Media, Inc. has taken or will take several actions to inform its equity security holders of the commencement of these chapter 11 cases. Debtor Cumulus Media Inc. intends to file an 8-K with the U.S. Securities and Exchange Commission on or around the Petition Date, notifying security holders of Cumulus Media Inc. of the commencement of these chapter 11 cases and providing a link to the website relating to the Debtors' chapter 11 cases set up by the Debtors' proposed claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the "Noticing and Claims Agent"). The Debtors have established, through their Noticing and Claims Agent, a publicly accessible case website at www.veritaglobal.net/cumulusmedia that provides information about these cases and copies of all public filings free of charge. In addition, the Debtors intend to cause the notices required under Bankruptcy Rule 2002(d) to be served on registered holders of Cumulus Media Inc. common stock as soon as is practicable with instructions to forward such notices or copies thereof to the beneficial holders of such equity securities. Accordingly, the Debtors respectfully request that the requirements to file a list of and to provide notice directly to Debtor Cumulus Media Inc.'s equity security holders be waived.

Emergency Consideration

18. Pursuant to Bankruptcy Rule 6003, which empowers a court to grant relief within the first 21 days after the commencement of a chapter 11 case "to the extent that relief is necessary to avoid immediate and irreparable harm," and Bankruptcy Local Rule 9013-1(i), the Debtors respectfully request emergency consideration of this motion. An immediate and orderly transition

into chapter 11 is critical to the viability of the Debtors' operations and any delay in granting the relief requested could hinder the Debtors' operations and cause irreparable harm. Failure to obtain the requested relief during the first 21 days of these chapter 11 cases would severely disrupt the Debtors' operations at this critical juncture and imperil the Debtors' restructuring efforts. Accordingly, the Debtors respectfully request that the Court grant the relief requested in this motion on an emergency basis.

Notice

19. The Debtors will provide notice of this motion to the following parties or their respective counsel: (a) the Office of the United States Trustee for the Southern District of Texas; (b) the holders of the 30 largest unsecured claims against the Debtors (on a consolidated basis); (c) Riemer & 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.

20. 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 Noticing and Claims Agent, at www.veritaglobal.net/cumulusmedia.

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.

Dated: March 5, 2026

Respectfully submitted,

/s/ John F. Higgins

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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

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)

ORDER (I) AUTHORIZING THE DEBTORS TO (A) FILE A CONSOLIDATED LIST OF CREDITORS, (B) FILE A CONSOLIDATED LIST OF THE 30 LARGEST UNSECURED CREDITORS, AND (C) REDACT CERTAIN PERSONAL IDENTIFICATION INFORMATION; (II) WAIVING OR MODIFYING THE REQUIREMENT TO FILE A LIST OF EQUITY SECURITY HOLDERS; AND (III) GRANTING RELATED RELIEF

[Relates to Docket No. __]

Upon the motion (the "Motion") of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") (a) authorizing the Debtors to (i) file a consolidated creditor matrix in lieu of submitting separate mailing matrices for each Debtor, (ii) file a consolidated list of their 30 largest unsecured creditors, and (iii) redact certain personal identification information; (b) waiving or modifying the requirement to file a list of, and provide notice directly to, the equity security holders for Debtor Cumulus Media Inc.; (c) approving the form and manner of the Notice of Commencement and the scheduling of the meeting of the creditors under section 341 of the Bankruptcy Code; and (d) granting related relief, all as more fully set forth in the Motion; and upon 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

[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.

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. The Debtors are authorized, but not directed, to file a single consolidated Creditor Matrix for all of these chapter 11 cases.

2. The Debtors are authorized, but not directed, to file the consolidated Top 30 List.

3. The Debtors are authorized, but not directed to redact all personally identifiable information in respect of individuals or any other natural person, including current and former employees, directors, creditors, and equity security holders of the Debtors listed on the Creditor Matrix or any other documents filed with the Court; *provided*, that the Debtors shall provide an unredacted version of the Creditor Matrix to the Court, the U.S. Trustee, any statutory committees appointed in these chapter 11 cases, and, upon request (which may be made via email), to any party in interest that represents that the unredacted list will be utilized solely for giving notice in

the chapter 11 cases, and otherwise be maintained in confidence, and covenants not to transfer or otherwise provide such unredacted personally identifiable information to any person or entity not party to that request. The Debtors shall inform the U.S. Trustee and the Court promptly after denying any request for the unredacted list pursuant to this Order.

4. The requirements that Debtor Cumulus Media Inc. file a list of its equity security holders pursuant to Bankruptcy Rule 1007(a)(3) and provide notice directly to such equity security holders under Bankruptcy Rule 2002(d) are waived. The Debtors will serve the notices required under Bankruptcy Rule 2002(d) on the registered holders of Debtor Cumulus Media Inc.'s equity securities and, to the extent they are known and it is reasonably practicable, on the beneficial holders of such equity securities through the appropriate broker, or other intermediary, to the extent a beneficial equity holder holds its equity securities through such intermediary. In addition, if they have not already done so as of the entry of this Order, the Debtors shall file a Form 8-K with the United States Securities and Exchange Commission as soon as practicable after entry of this Order, notifying their equity security holders and other parties in interest of the filing of these chapter 11 cases and providing a link to the website relating to the Debtors' chapter 11 cases set up by the Debtors' Noticing and Claims Agent.

5. The Debtors, through their Noticing and Claims Agent, are authorized to distribute all pleadings and papers to parties in interest via email; *provided* that if the Debtors do not have a party in interest's email, then the Debtors, through their Noticing and Claims Agent, shall mail all pleadings and papers to the last known address the Debtors have on file for such party in interest.

6. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. 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