Docket #0228 Date Filed: 04/13/2026

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)

JOINDER OF THE AD HOC GROUP IN SUPPORT OF THE DEBTORS' (I) MEMORANDUM OF LAW IN SUPPORT OF (A) FINAL APPROVAL OF THE DEBTORS' DISCLOSURE STATEMENT AND (B) CONFIRMATION OF THE DEBTORS' PLAN AND (II) REPLY TO U.S. TRUSTEE OBJECTION THERETO

[Related to Docket Nos. 21, 186, 218, and 225]

The ad hoc group represented by the undersigned counsel (the "Ad Hoc Group") hereby files this joinder (the "Joinder") to the *Debtors' (I) Memorandum of Law in Support of (A) Final Approval of the Debtors' Disclosure Statement and (B) Confirmation of the Debtors' Plan and (II) Reply to U.S. Trustee Objection Thereto* [Docket No. 218] submitted to the Court by the above-captioned debtors and debtors in possession (the "Debtors' Confirmation Brief"). In support thereof, the Ad Hoc Group respectfully states as follows:

JOINDER

1. The Ad Hoc Group joins the Debtors' Confirmation Brief in full and supports the entry of an order (i) approving, on a final basis, the *Disclosure Statement for the Joint Prepackaged Chapter 11 Plan of Reorganization of Cumulus Media Inc. and Its Debtor Affiliates* [Docket No. 21] (as modified, amended, or supplemented from time to time, the "Disclosure Statement"), and (ii) confirming the *Modified Joint Prepackaged Chapter 11 Plan of Reorganization of Cumulus*

[1] A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' 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.

Media Inc. and Its Debtor Affiliates [Docket No. 225] (as modified, amended, or supplemented from time to time, the "Plan").

2. As set forth in the Debtors' Confirmation Brief, the Plan enjoys overwhelming support from the Debtors' major stakeholders across the capital structure. All Voting Classes have voted to accept the Plan. Of the Holders that voted, Holders of 100.00% in principal amount of the ABL Facility Claims, 100.00% in principal amount of the 2029 Secured Claims, and 98.93% in principal amount of the Other Funded Debt Claims voted to accept the Plan.

3. The Plan contains customary third-party releases and the Plan's opt-out mechanism for voting classes is fully consistent with the Supreme Court's decision in *Purdue*,[2] the District Court's opinion in *Container Store*,[3] long-standing Fifth Circuit practice, and this Court's own precedent. Moreover, the facts and circumstances of these cases (including the procedures deployed by the Debtors to publicize the opt-out mechanism) warrant approval of the third-party releases. This Court has repeatedly overruled substantially similar objections in similar circumstances, and the U.S. Trustee offers no principled basis to depart from those rulings. *See, e.g.*, *In re Kleopatra Finco S.à r.l.*, No. 25-90642 (CML) (Bankr. S.D. Tex. Nov. 4, 2025); *In re MLN US HoldCo LLC*, No. 25-90090 (CML) (Bankr. S.D. Tex. Mar. 9, 2025); *In re Audacy, Inc.*, No. 24-90004 (CML) (Bankr. S.D. Tex. Jan. 7, 2024).

CONCLUSION

For the foregoing reasons, and the reasons set forth in the Debtors' Confirmation Brief, the Ad Hoc Group requests that (a) the Court overrule the objection of the U.S. Trustee [Docket No. 186] and (b) enter an order approving the Disclosure Statement and Plan on a final basis.

2 *Harrington v. Purdue Pharma L.P.*, 603 U.S. 204 (2024).
3 *In re The Container Store Grp., Inc.*, No. 24-90627 (ARP) (Bankr. S.D. Tex. Jan. 24, 2025).

Dated: April 13, 2026
Houston, Texas

Respectfully submitted,

/s/ Tom A. Howley

HOWLEY LAW PLLC
Tom Howley (TX Bar No. 24010115)
700 Louisiana Street, Suite 4220
Houston, TX 77002
Telephone: 713-333-9120
Email: tom@howley-law.com

Scott J. Greenberg (N.Y. Bar No. 4126991)
Michael J. Cohen (N.Y. Bar No. 4058533)
Stephen D. Silverman (N.Y. Bar No. 5410238)
Tommy Scheffer (N.Y. Bar No. 5695598)
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166
Telephone: 212-351-4000
Email: sgreenberg@gibsondunn.com
Email: mcohen@gibsondunn.com
Email: ssilverman@gibsondunn.com
Email: tscheffer@gibsondunn.com

- and -

Francis Petrie (C.A. Bar. No. 343218)
333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: (213) 229-7000
Email: fpetrie@gibsondunn.com

Attorneys for the Ad Hoc Group

Certificate of Service

I certify that on April 13, 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/ Tom A. Howley
Tom A. Howley