

## **Exhibit 1**

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

TRIBUNE COMPANY, et al.,

Debtors.

Chapter 11

Cases No. 08-13141 (KJC)

Jointly Administered

Hearing Date: Feb. 8 2011 at 10:00 a.m. (ET)

**STIPULATION CONCERNING LAW DEBENTURE'S MOTION  
(D.I. 7522) TO COMPEL ANGELO GORDON TO PRODUCE  
DOCUMENTS PURSUANT TO BANKRUPTCY RULES 9014 AND  
7037 AND FEDERAL RULE OF CIVIL PROCEDURE 37**

WHEREAS Law Debenture Trust Company of New York ("Law Debenture") filed a motion (D.I. 7522) to compel Angelo, Gordon & Co., L.P. ("Angelo Gordon") to produce certain FCC-Related Documents (the "Motion");

WHEREAS Angelo Gordon has objected to the Motion;

WHEREAS the parties have negotiated a settlement that fully resolves the Motion on the terms and conditions set forth in this Stipulation and [Proposed] Order;

IT IS NOW HEREBY STIPULATED AND AGREED:

Subject to the following paragraphs of this Stipulation, Angelo Gordon will produce the following documents to Law Debenture relating to FCC matters ("FCC Discovery"):

1. With respect to Freedom Communications Holdings, Inc., Philadelphia Media Network, Inc., the publisher of The Philadelphia Inquirer, and TTBG LLC, the Certificate of Incorporation, Bylaws, Stockholders Agreement, Limited Liability

Company Agreement, Partnership Agreement, or similar documents, to the extent the same (x) are within Angelo Gordon's possession, and (y) show:

- (a) the governance structure of such entity and any governance or management authority or rights of Angelo Gordon, including director designation or nomination rights; or
- (b) the Equity Interest<sup>1</sup> or Debt Interest<sup>2</sup> held or managed by Angelo Gordon;<sup>3</sup> and
- (c) to the extent that such documents do not reflect the information called for in Paragraph 1(b), a statement indicating whether Angelo Gordon owns a 5% or greater Equity Interest or more than a 33% Debt Interest, and, with respect to any 5% or greater Equity Interest, whether such interest is between 5% and 25%, exceeds 25% but is not more than 50%, or exceeds 50%.

2. With respect to the entities set forth on Exhibit A hereto,

- (a) a statement indicating whether Angelo Gordon owns a 5% or greater Equity Interest or more than a 33% Debt Interest, and, with respect to any

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<sup>1</sup> "Equity Interest" means any current direct or indirect ownership interest, excluding any contingent or future interest such as an option or warrant.

<sup>2</sup> "Debt Interest" means any debt.

<sup>3</sup> For purposes of paragraphs 1-2, "Angelo Gordon" means Angelo Gordon or any affiliate of Angelo Gordon.

5% or greater Equity Interest, whether such interest is between 5% and 25%, exceeds 25% but is not more than 50%, or exceeds 50%; and

- (b) for any such entity in which Angelo Gordon holds such an interest, the Certificate of Incorporation, Bylaws, Stockholders Agreement, Limited Liability Company Agreement, Partnership Agreement, or similar documents, to the extent the same (x) are within Angelo Gordon's possession, (y) are not restricted from disclosure (including by any applicable confidentiality provisions or agreements), and (z) show:
  - (i) the governance structure of such entity and any governance or management authority or rights of Angelo Gordon, including director designation or nomination rights; or
  - (ii) the Equity Interest or Debt Interest held or managed by Angelo Gordon.

- 3. Provision of the information set forth herein will resolve Law Debenture's Motion to Compel [D.I. 7512], which Law Debenture shall promptly withdraw with prejudice. Any documents and information that Angelo Gordon may produce in connection with this resolution are subject to the protections of the Depository Order [D.I. 2858]; as provided by the Depository Order and Acknowledgement thereto, Law Debenture agrees to use the documents "solely in connection with the Cases." (Acknowledgement, ¶ 3.) Pursuant to the Depository Order and Acknowledgment, certain documents produced by Angelo Gordon may be designated "Financial Institution Highly Confidential," "Highly Confidential –

Attorneys' Eyes Only," or "Confidential." Law Debenture reserves its rights pursuant to the Depository Order and Acknowledgement to challenge such designations, but will abide by the terms of the Depository Order and Acknowledgment applicable to such documents and, absent further order of the Court, will not use such documents in a bankruptcy or other court filing unless filed under seal. (Acknowledgment, ¶ 7) In addition, absent further order of the Court, Law Debenture agrees not to raise, utilize, provide or discuss any such documents (as identified in the preceding sentence), or facts learned therein, with the FCC, except to the extent such documents or facts are otherwise publicly available (other than by means of a violation of this Stipulation and Order). Angelo Gordon reserves all of its rights as set forth in Angelo Gordon's Objections and Responses to Law Debenture's Second Request for the Production of Documents.

4. The statements provided pursuant to this Stipulation shall be based on Angelo Gordon's knowledge, information and belief, formed after a reasonable, good faith inquiry. Angelo Gordon will use its reasonable best efforts to produce the foregoing documents on a rolling basis by February 11, 2011, and will in any event comply with its obligation under the Case Management Order to complete production within 15 days of this Order.
5. To the extent that Law Debenture wishes to submit a report on behalf of an FCC expert, such report shall be due on February 14, 2011 by 1 p.m. EST. To the extent that Angelo Gordon or any other proponent of the

Debtor/Committee/Lender Plan wishes to submit a rebuttal report on behalf of an  
FCC expert, such report shall be due on February 25, 2011.

Dated: February 4, 2011  
Wilmington, DE

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Dated: February 4, 2011  
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**Exhibit A**

Affiliated Media Inc.
Sun-Times Media Holdings LLC
ASP Westward, L.P.
Seattle Times Company
Swift Newspapers Inc.
Halifax Media Acquisition Inc.
American Consolidated Media, L.P.
GateHouse Media Inc
Fisher Communications Inc.
Black Crow Media Group
Newsweb Corporation
Cherry Creek Radio LLC
Citadel Broadcasting
Grupo Radio Centro
Entravision Communications Corp
ION Media Networks Inc.
Inner City Broadcasting Corporation
Journal Register company
Lazer Broadcasting Corporation
Liberman Broadcasting Inc.
Max Media LLC
Morris Communications Company
Midwest Communications Incorporated
Millennium Radio Group LLC
Nassau Broadcasting
NextMedia Group Inc.
NRG Media LLC
Radio One Inc.
Saga Communications Inc
Salem Communications Corporation
Sinclair Broadcast Group Inc.
Spanish Broadcasting Systems
Townsquare Media LLC
Broadcasting Media Partners [Univision]
Vox Media
WRNN-TV
ZGS Communications