

Hearing Date: February 25, 2004 at 10:00 a.m.
Objection Deadline: February 23, 2004 at 4:00 p.m.

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Counsel for KMC Telecom XI LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
ALLEGIANCE TELECOM, INC., et al., :
Debtors. : Case No. 03-13057 (RDD)
: (Jointly Administered)
: :
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**NOTICE OF MOTION OF KMC TELECOM XI LLC PURSUANT TO BANKRUPTCY
RULE 9018, SECTION 105(a) OF THE BANKRUPTCY CODE AND RULE 60(b) OF
THE FEDERAL RULES OF CIVIL PROCEDURE TO VACATE ORDER PURSUANT
TO SECTION 107(b) OF THE BANKRUPTCY CODE AND RULE 9018 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE (A) AUTHORIZING LEVEL 3
COMMUNICATIONS, LLC TO FILE ALL EXHIBITS TO THE MOTION FOR
RECOUPMENT AND RELIEF FROM THE AUTOMATIC STAY UNDER SEAL, AND
(B) SCHEDULING AN IN CAMERA HEARING ON THE MOTION**

PLEASE TAKE NOTICE that KMC Telecom XI LLC (“KMC”) will move (the
“Motion”) before the Honorable Robert D. Drain, United States Bankruptcy Judge, on **February
25, 2004 at 10:00 a.m. (Eastern Standard Time)**, or as soon thereafter as counsel may be
heard, for an order vacating or modifying as to KMC that certain Order Pursuant to Section
107(b) of the Bankruptcy Code and Rule 9018 of the Federal Rules of Bankruptcy Procedure (A)

Authorizing Level 3 Communications, LLC to File All Exhibits to the Motion for Recoupment and Relief from the Automatic Stay Under Seal, and (B) Scheduling an In Camera Hearing on the Motion, entered at Docket No. 919 on February 10, 2004, at a hearing to be held in Courtroom 610 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that you need not appear at the Hearing if you do not object to the relief requested in the Motion.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or at a later hearing.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must be: (i) in writing; (ii) state with particularity the grounds therefor; (iii) filed with the Bankruptcy Court (with a copy to the Judge's chambers); and (iv) served upon (a) Sidley Austin Brown & Wood LLP, 10 South Dearborn Street, Chicago, Illinois 60603, Attention: Shalom L. Kohn Esq., counsel to KMC, (b) Sidley Austin Brown & Wood LLP, 787 Seventh Avenue, New York, New York 10019, Attention: Dana P. Kane, Esq., counsel to KMC and (ii) the Office of the United States Trustee for this District, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attention: Pamela J. Lustrin, Esq., together with proof of service thereof, so as to be received no later than **February 23, 2004 at 4:00 p.m. (Eastern Standard Time)**.

PLEASE TAKE FURTHER NOTICE that unless objections are received by that time, the relief may be granted as requested in the Motion.

Dated: New York, New York
February 13, 2004

SIDLEY AUSTIN BROWN & WOOD LLP

By: /s/ Shalom L. Kohn
(A Member of the Firm)
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- and -

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