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Karen B. Dine (KD 0546)  
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**Hearing Date and Time:**  
**May 29, 2004 at 10:00 a.m. Eastern**  
**Objection Date:**  
**May 13, 2004 at 5:00 p.m. Eastern**

-and-

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Attorneys for Transamerica Realty Investment Properties, LLC

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**ALLEGIANCE TELECOM, INC., et al.,**

**Debtors and Debtors-in-Possession**

**Chapter 11**

**Case No.: 03-13057 (RDD)**

**Jointly Administered**

**NOTICE OF MOTION OF TRANSAMERICA REALTY INVESTMENT  
PROPERTIES, LLC TO COMPEL IMMEDIATE PAYMENT OF POST-PETITION  
ADMINISTRATIVE EXPENSES ARISING FROM UNEXPIRED LEASE OF  
NONRESIDENTIAL REAL PROPERTY PURSUANT TO 11 U.S.C. § 365(d)(3)**

PLEASE TAKE NOTICE that upon the annexed Motion, dated April 28, 2004, of Transamerica Realty Investment Properties, LLC (successor-in-interest to Pyramid Investment Corporation), (“Transamerica”), to Compel Immediate Payment of Post-petition Administrative Expenses Arising from Unexpired Lease of Nonresidential Real Property Pursuant to 11 U.S.C. § 365(d)(3) (the “Motion”), a hearing will be held before the Hon. Robert D. Drain, United

States Bankruptcy Judge, in Room 610 of the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), Alexander Hamilton Custom House, One Bowling Green, New York, New York, 10004-1408, on May 19, 2004, at 10:00 a.m. (prevailing Eastern Time), or as soon thereafter as Transamerica may be heard.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules of the Southern District of New York, shall set forth the name of the objectant, the nature and amount of claims or interests held or asserted by the objectant against the Debtors’ estates or property, the basis for the objection, and the specific grounds therefore, and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers) and served in accordance with General Order M-242, and shall further be served upon (a) Kirkland & Ellis LLP, Citigroup Center, 153 East 53rd Street, New York, New York 10022 (Attn. Samuel S. Kohn, Esq.); (b) the Office of the United States Trustee, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn. Pamela J. Lustrin, Esq.); (c) Paul, Hastings, Janofsky & Walker LLP, 600 Peachtree Street, N.E., 24th Floor, Atlanta, Georgia 30308 (Attn. Jesse Austin, III, Esq.); (d) Akin Gump Strauss Hauer Feld LLP, 590 Madison Avenue, New York, New York 10022 (Attn. Ira S. Dizengoff, Esq.); and (e) the undersigned counsel for Transamerica at the address listed below, so as to be actually received no later than May 13, 2004, at 5:00 p.m. (prevailing Eastern Time).

Dated: April 29, 2004  
New York, New York

By: /s/ Karen B. Dine  
Karen B. Dine (KD 0546)  
Harry E. Garner (HG 6717)  
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