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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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:   
In re: : Chapter 11  
:   
ALLEGIANCE TELECOM, INC., et al., : Case No. 03-13057 (RDD)  
:   
Debtors. : (Jointly Administered)  
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**MOTION FOR ADMISSION OF  
SCOTT D. COUSINS PRO HAC VICE**

Allen Kadish (“Movant”), a member in good standing of the Bar of the State of New York, an attorney admitted to practice before the United States District Court for the Southern District of New York, and Of Counsel of the law firm of Greenberg Traurig, LLP (“Greenberg”), hereby moves for entry of an order permitting Scott D. Cousins, a shareholder of Greenberg, practicing in Greenberg’s Wilmington, Delaware office, to practice *pro hac vice*, before the United States Bankruptcy Court for the Southern District of New York to represent Scott, Douglass & McConnico, LLP pursuant to Local Bankruptcy Rule 2090-1(b), in the above captioned cases. Upon the annexed Declaration of Scott D. Cousins, in support of the Motion, Movant states as follows:

1. Movant requests that this Court authorize Mr. Cousins to file pleadings and appear and be heard at hearings in these Chapter 11 cases. Movant requests, pursuant to Local Rule 2090-1(b), that Mr. Cousins be authorized to make appearances in this Court without being accompanied by a member of the Bar of the Bankruptcy Court for the Southern District of New York and that Mr. Cousins be authorized to sign and file pleadings, notices and other court

documents without such pleadings, notices, and other court documents being signed by a member of the Bar of the Bankruptcy Court for the Southern District of New York.

WHEREFORE, Movant respectfully requests the Court enter an Order, substantially in the form annexed hereto as Exhibit A, (i) permitting Mr. Cousins to appear *pro hac vice* as counsel for Scott, Douglass & McConnico, LLP in the above-captioned Chapter 11 cases under the conditions set forth above, and (ii) granting such other further relief as is just and equitable.

Dated: New York, New York  
November 6, 2003

GREENBERG TRAURIG, LLP

By:     /s/ Allen G. Kadish      
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