

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	
	:	Chapter 11 Case No.
Allegiance Telecom, Inc., <u>et al.</u> ,	:	03-13057 (RDD)
	:	
Debtors.	:	Jointly Administered

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**STIPULATION AND ORDER PERMITTING  
CERTAIN CLAIMANTS TO FILE CONSOLIDATED CLAIMS**

Allegiance Telecom, Inc. and its direct and indirect subsidiaries, as debtors and debtors in possession (collectively, the “Debtors”) and each of the Claimants (as defined herein), by and through their counsel, hereby stipulate and agree, subject to Court approval, as follows:

WHEREAS, on May 14, 2003, the Debtors each commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”); and

WHEREAS, on September 10, 2003, the Debtors filed that certain Application of the Debtors for Order Pursuant to Bankruptcy Rule 3003(c) Fixing Final Date for Filing Certain Proofs of Claim, Approving Proposed Proof of Claim Forms, Approving Proposed Bar Date Notice, and Approving Proposed Notice Procedures (the “Bar Date Application”); and

WHEREAS, on September 23, 2003, the Court entered that certain Order Pursuant to Bankruptcy Rule 3003(c) Fixing Final Date for Filing Certain Proofs of Claim, Approving Proposed Proof of Claim Forms, Approving Proposed Bar Date Notice, and Approving Proposed Notice Procedures (the “Bar Date Order”); and

WHEREAS, in the Bar Date Order, the Court fixed November 26, 2003, at 5:00 p.m., prevailing Eastern Time, as the final date and time by which proofs of claim must be filed in these chapter 11 cases (the “Bar Date”); and

WHEREAS, the following directors of Allegiance Telecom, Inc. may hold claims against each or several of the Debtors and, therefore, must file proofs of claims on account of such claims in a chapter 11 case of each such Debtor: James E. Crawford, III, Paul J. Finnegan, Andrew D. Lipman, Jacob J. Goldberg, Reed E. Hundt and James N. Perry, Jr. (collectively, the “Claimants”); and

WHEREAS, for the purposes of administrative convenience, the Debtors and the Claimants have agreed that the filing of a proof of claim or proofs of claim by any of the Claimants in the chapter 11 case of Allegiance Telecom, Inc. (Case No. 03-13057(RDD)) will be deemed to constitute the filing of proofs of claims in each of the Debtors’ chapter 11 cases.

**ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

1. Notwithstanding anything to the contrary in the Bar Date Order, the Bankruptcy Code and/or the Federal Rules of Bankruptcy Procedure that would otherwise require the Claimants to file individual proofs of claim in a chapter 11 case of each of or several of the Debtors, filing of a proof of claim or proofs of claim by any of the Claimants in the chapter 11 case of Allegiance Telecom, Inc. (Case No. 03-13057(RDD)) will be deemed to constitute the filing of proofs of claims in each of the Debtors’ chapter 11 cases.

2. This Stipulation and Order is intended solely for the purpose of administrative convenience and shall not affect the substantive rights of the Debtors, the Claimants or any other party in interest, including but not limited to, the Debtors’ rights to object to each proof of claim filed by any of the Claimants on any grounds.

3. This Stipulation and Order shall have no force or effect and shall not be binding upon either the Debtors or any of the Claimants unless and until it is approved by the Court.

Dated: New York, New York  
November 25, 2003

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By: /s/ Gregg D. Josephson  
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ATTORNEYS FOR THE DEBTORS AND  
DEBTORS IN POSSESSION

ATTORNEYS FOR THE CLAIMANTS

SO ORDERED, this 25<sup>th</sup> day of November 2003

/s/ ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE