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Counsel to the Reorganized Debtors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

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|-----------------------------|---|---|
| FIBERTOWER NETWORK SERVICES | § | |
| CORP., <i>et al.</i> , | § | Adv. Pro. No. 12-04104-MXM ¹ |
| | § | |
| Reorganized Debtors. | § | |
| | § | |
| v. | § | |
| | § | |
| FEDERAL COMMUNICATIONS | § | |
| COMMISSION, | § | |
| | § | |
| Defendant. | § | |

**STATEMENT IN SUPPORT OF MOTION
FOR ENTRY OF AMENDED SCHEDULING ORDER**

FiberTower Network Services Corp. and certain of its affiliates² in their capacities as reorganized debtors, hereby file their statement in support of the Motion for Entry of an Amended Scheduling Order [Adv. Pro. Docket No. 73] (the “Motion”) filed on June 6, 2016 by

¹ On September 2, 2015, the Court entered its *Order Granting Reorganized Debtors’ Application For Final Decree Closing Certain of the Reorganized Debtors’ Chapter 11 Cases Pursuant to Section 350(A) of the Bankruptcy Code and Bankruptcy Rule 3022* (the “Final Decree for Certain Cases”) in each of the Reorganized Debtors’ chapter 11 cases. In the Final Decree for Certain Cases, the Court closed the chapter 11 cases of (i) FiberTower Network Services Corp. (Case No. 12-44027-DML-11), (ii) FiberTower Corporation (Case No. 12-44029-DML-11), and (iii) FiberTower Licensing Corp. (Case No. 44030-DML-11). The chapter 11 case of FiberTower Spectrum Holdings LLC (Case No. 12-44031-MXM-11) and the above-captioned adversary proceeding (Adv. Pro. No. 12-04104-MXM) remain open pursuant to the Final Decree for Certain Cases.

² The reorganized debtors are: (i) FiberTower Network Services Corp.; (ii) FiberTower Corporation; (iii) FiberTower Licensing Corp.; and (iv) FiberTower Spectrum Holdings LLC.

the U.S. Department of Justice and respectfully request that this Court enter an Order granting the relief requested in Motion as set forth in the proposed Order appended thereto.

Respectfully submitted this 25th day of May, 2016.

ANDREWS KURTH LLP

By: /s/ Paul N. Silverstein
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served on parties receiving ECF Electronic Notice in this proceeding on the 25th day of May, 2016.

/s/ Michelle V. Larson