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

In re: § Chapter 11
§
FIBERTOWER NETWORK SERVICES § Case No. 12-44027-DML-11
CORP., *et al.*, §
§ Jointly Administered
Debtors. §

MOTION FOR EXPEDITED HEARING ON DEBTORS’ MOTION FOR AUTHORITY TO (I) MAKE POST-CONFIRMATION AMENDMENT TO DEBTORS’ FOURTH AMENDED JOINT CHAPTER 11 PLAN PURSUANT TO 11 U.S.C. § 1127(B) AND (II) ENTER INTO TRUST AGREEMENT WITH RESPECT TO CERTAIN FCC LICENSES

The above-captioned debtors and debtors in in possession (collectively, the “Debtors”),¹ for their Motion (this “Motion to Expedite”) for Expedited Hearing on their Motion for Authority to (i) Make Post-Confirmation Amendment to Debtors’ Fourth Amended Joint Chapter 11 Plan Pursuant to 11 U.S.C. § 1127(b) and (ii) Enter into Trust Agreement with Respect to Certain FCC Licenses [Docket No. 1078] (the “Motion”), respectfully represent:

1. The Debtors request that a hearing on the Motion be set no later than March 25, 2014 at 1:30 p.m. prevailing Central Time. A hearing by such date is necessary because, as described in the Motion, due to an ambiguity in the Plan, the Effective Date under the Plan has not yet occurred, notwithstanding that the Plan was confirmed more than six (6) weeks ago. The

¹ The Debtors in these chapter 11 cases are: (i) FiberTower Network Services Corp.; (ii) FiberTower Corporation; (iii) FiberTower Licensing Corp.; and (iv) FiberTower Spectrum Holdings LLC.

Debtors submit that going effective as expeditiously as possible would be in the best interests of the Debtors' estates and all parties in interest. Approval of the Motion on the expedited basis requested herein would permit that to happen.

2. As described in the Motion, one of the conditions precedent to effectiveness in the Plan is that the Debtors shall have obtained approval from the FCC with respect to the transfer from FiberTower Spectrum Holdings, LLC to Reorganized FiberTower Spectrum of the licenses that were not terminated by the FCC pursuant to the FCC Opinion. The FCC has approved the transfer from FiberTower Spectrum Holdings, LLC to Reorganized FiberTower Spectrum of forty-six (46) of the forty-nine (49) FCC Licenses, constituting substantially all of the aggregate value attributable to the FCC Licenses. Because the FCC has not ruled with respect to the transfer of *all* of the Pending Licenses, however, it is arguable that the condition precedent to effectiveness set forth in section 10.2(d) of the Plan has not been satisfied. The Motion seeks to cure such ambiguity.

3. As set forth in the Motion, the Debtors believe that such Plan Amendment is immaterial and not adverse to parties in interest, and necessary to carry out the purposes and effects of the Plan. The Ad Hoc 2016 Committee has agreed to the relief set forth in the Motion. In addition, the transactions contemplated by the Motion - - i.e., the transfer of the Pending Licenses to the Trust - - shall be subject to the prior approval of the FCC. Consequently, the FCC's approval rights with respect to the assignment of the Pending Licenses is not being affected or compromised in any way under the Motion.

4. Notice of the proposed expedited hearing will be provided to (i) Counsel to the Ad Hoc 2016 Committee, (ii) counsel to the Official Committee of Unsecured Creditors, (iii) the U.S. Trustee, (iv) the FCC and (v) the parties appearing on the Limited Service List maintained

in these cases. This notice will be sufficient because the Debtors believe that none of the Debtors' principal constituents will object to the Motion.

5. A hearing was not requested earlier because the Debtors continue to be in discussions with the FCC with respect to the approval of the assignment of the Pending Licenses to Reorganized FiberTower Spectrum (and, therefore, the need for the relief requested in the Motion was not present).

WHEREFORE, the Debtors respectfully request that the Court enter an Order: (i) granting the relief requested herein and (ii) granting such other and further relief as may be just and proper.

Respectfully submitted this 20th day of March, 2014.

ANDREWS KURTH LLP

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

The Debtors have discussed the motion with (i) the Official Committee of Unsecured Creditors, (ii) the Ad Hoc 2016 Committee and (iii) the FCC. None of such parties opposes expedited consideration of this Motion.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on the 20th day of March, 2014, he caused a true and correct copy of the foregoing document to be served upon (i) counsel to the Committee, (ii) the U.S. Trustee, (iii) the FCC and (iv) all parties appearing on the Limited Service List maintained in these chapter 11 cases via first class U.S. mail, postage prepaid.

/s/Jeremy B. Reckmeyer

Jeremy B. Reckmeyer