

Hearing Date:
March 24, 2005 at 10:30 a.m.
Response Deadline:
March 14, 2005 at 4 p.m.
PORTLAND

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

In re:)
) Chapter 11
)
PEGASUS SATELLITE TELEVISION, INC., et al.) Case No. 04-20878
)
)
Debtor.) (Jointly Administered)
)
_____)

**NOTICE OF DEBTORS' THIRD OMNIBUS OBJECTION TO AND
MOTION TO RECLASSIFY, REDUCE OR DISALLOW CERTAIN
CLAIMS PURSUANT TO 11 U.S.C. § 502(b), BANKRUPTCY
RULES 3001 AND 3007, AND D. ME. LBR 3007-1**

PLEASE TAKE NOTICE that the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”)¹ have today filed their Third Omnibus Objection to and Motion to Reclassify, Reduce or Disallow Certain Claims Pursuant to 11 U.S.C. § 502(b), Federal Rules of Bankruptcy Procedure 3001 and 3007, and D. Me. LBR 3007-1 (the “Third Objection”), a copy of which is attached hereto, with the United States Bankruptcy Court for the District of Maine.

PLEASE TAKE FURTHER NOTICE that on **March 24, 2005 at 10:30 a.m.**, the Honorable James B. Haines, Jr., United States Bankruptcy Judge, will conduct a hearing (the

1 The Debtors are: Argos Support Services Company, Bride Communications, Inc., B.T. Satellite, Inc., Carr Rural TV, Inc., DBS Tele-Venture, Inc., Digital Television Services of Indiana, LLC, DTS Management, LLC, Golden Sky DBS, Inc., Golden Sky Holdings, Inc., Golden Sky Systems, Inc., Henry County MRTV, Inc., HMW, Inc., Pegasus Broadcast Associates, L.P., Pegasus Broadcast Television, Inc., Pegasus Broadcast Towers, Inc., Pegasus Media & Communications, Inc., Pegasus Satellite Communications, Inc., Pegasus Satellite Television of Illinois, Inc., Pegasus Satellite Television, Inc., Portland Broadcasting, Inc., Primewatch, Inc., PST Holdings, Inc., South Plains DBS, LP., Telecast of Florida, Inc., WDSI License Corp., WILF, Inc., WOLF License Corp., and WTLH License Corp.

“Hearing”) on the Third Objection in his courtroom in the United States Bankruptcy Court for the District of Maine (the “Bankruptcy Court”), 537 Congress Street, 2nd Floor, Portland, Maine 04101.

PLEASE TAKE FURTHER NOTICE that **your rights may be affected.** If your claim is listed in any of Exhibits A through G to the Third Objection or if your claim is specifically identified in the Third Objection, the Debtors are seeking to reclassify, reduce, or disallow your claim in whole or in part as set forth in the Third Objection. You should read the Third Objection and all Exhibits thereto carefully and discuss them with your attorney, if you are represented by one. If you are not represented by an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not wish the Bankruptcy Court to reclassify, reduce, or disallow your claim as set forth in the Third Objection, you **must** file a written response (a “Response”) to the Third Objection so that it is actually received and filed, by no later than **4:00 p.m. (Eastern Time) on March 14, 2005 (the “Response Deadline”)** by the Bankruptcy Court at:

United States Bankruptcy Court
537 Congress Street, 2nd Floor
Portland, Maine 04101

Every Response must also be served upon the following entities at the following addresses: (a) Office of the Clerk of the United States Bankruptcy Court; (b) Sidley Austin Brown & Wood LLP, Attn: Guy S. Neal, Esq., 787 Seventh Avenue, New York, New York 10019; (c) Sidley Austin Brown & Wood LLP, Attn: Paul S. Caruso, Esq., Bank One Plaza, 10 South Dearborn Street Chicago, Illinois 60603; (d) Bernstein, Shur, Sawyer & Nelson, Attn: Robert J. Keach, Esq., 100 Middle Street, P.O. Box 9729, Portland, Maine 04104; and (e) Akin

Gump Strauss Hauer & Feld, LLP, Attn: Philip C. Dublin, Esq., 590 Madison Avenue, New York, New York 10022 **so as to be actually received by no later than the Response Deadline.**

PLEASE TAKE FURTHER NOTICE that every Response to the Third Objection must contain at a minimum the following:

- (a) a caption setting forth the name of the Bankruptcy Court, the above-referenced case number and the title of the Third Objection to which the Response is directed; the name of the claimant and description of the basis for the amount of the Claim;
- (b) a concise statement setting forth the reasons why a particular claim should not be reclassified, reduced or disallowed for the reasons set forth in the Third Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Third Objection at the Hearing;
- (c) all documentation or other evidence of the claim in question, to the extent not already included with the claimant's proof of claim, upon which the claimant will rely in opposing the Third Objection at the Hearing;
- (d) the name, address, telephone number, and fax number of the person(s) (which may be the claimant or a legal representative thereof) possessing ultimate authority to reconcile, settle, or otherwise resolve the claim on behalf of the claimant; and
- (e) the name, address, telephone number, and fax number of the person(s) (which may be the claimant or a legal representative thereof) to whom the Debtors should serve any reply to the Response.

PLEASE TAKE FURTHER NOTICE that questions about the Third Objection should be directed in writing to Attn: Paul S. Caruso, Sidley Austin Brown & Wood LLP, Bank One Plaza, 10 South Dearborn Street Chicago, Illinois 60603. Claimants should not contact the Clerk of the Bankruptcy Court to discuss the merits of their claim.

PLEASE TAKE FURTHER NOTICE that if you fail to timely file and serve a Response in accordance with the requirements set forth in this notice, the Bankruptcy Court may decide that you do not oppose the relief sought by the Debtors in the Third Objection and may enter an order granting such relief without further notice or hearing.

Dated: Portland, Maine
February 22, 2005

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