

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

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

MOTION FOR EXPEDITED HEARING

Pegasus Satellite Television, Inc. and certain of its subsidiaries and affiliates, each a debtor and debtor-in-possession herein (collectively, the “Debtors”),¹ hereby file this motion (the “Motion”), requesting entry of an order pursuant to Rule 9013-1(i) of the District of Maine Local Rules of Bankruptcy Procedure granting an expedited hearing on the Debtors’ motion to approve a stipulation and order Pursuant to 11 U.S.C. §§ 105(a) and 505(a) and Bankruptcy Rule 9019 (the “9019 Motion”). In support of this Motion, the Debtors respectfully state as follows:

STATUS OF THE CASE AND JURISDICTION

1. On June 2, 2004 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). On the Petition Date, the Debtors also jointly filed motions or applications

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.

seeking certain typical “first day” orders, including an order to have these cases jointly administered.

2. The Debtors continue in possession of their properties and are operating and maintaining their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

3. On June 10, 2004, the United States Trustee for the District of Maine appointed an official committee of unsecured creditors pursuant to section 1102(a) of the Bankruptcy Code (the “Committee”).

4. No request has been made for the appointment of a trustee or examiner in these cases.

5. On January 31, 2005, the Debtors filed the Debtors’ First Amended Joint Chapter 11 Plan (the “Plan”) and accompanying First Amended Disclosure Statement for the Debtors’ First Amended Joint Chapter 11 Plan (the “Disclosure Statement”), each dated January 31, 2005. By orders dated February 9, 2005 (collectively, the “Orders”), the Court, among other things, approved the Disclosure Statement and set the hearing on confirmation of the Plan (the “Confirmation Hearing”) for March 24, 2005. The Confirmation Hearing was continued from time to time, including to April 14, 2005 at 10:30 p.m.

6. Following the Confirmation Hearing, on April 15, 2005, the Court entered the Findings of Fact, Conclusions of Law and Order Confirming Debtors’ First Amended Joint Chapter 11 Plan, confirming the Plan.

7. On the date hereof, the Debtors filed the 9019 Motion, pursuant to 11 U.S.C. §§ 105(a) and 505(a) and Bankruptcy Rule 9019.

8. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicate for the relief sought herein is Rule 9013-1(i) of the District of Maine Local Rules of Bankruptcy Procedure.

RELIEF REQUESTED

9. By this Motion, the Debtors are requesting that a hearing on the 9019 Motion be held on May 4, 2005 at 2:00 p.m. (prevailing Eastern time) (the “Proposed Hearing Date”), and that the objection deadline to this Motion be set for April 29, 2005 at 4:00 p.m. (prevailing Eastern time) (the “Proposed Objection Deadline”).

10. Rule 9013-1(i) of the District of Maine Local Rules of Bankruptcy Procedure provides that if a “movant seeks to have a motion considered by the Court earlier than fifteen (15) days after the motion is filed, it shall file a separate motion” for an expedited hearing.

11. The Debtors submit that the Proposed Hearing Date is in the best interests of the Debtors’ estates, its creditors and other parties in interest. Specifically, holding a hearing on an expedited basis permits the Debtors to avoid the uncertainty and expense of litigation over numerous disputes surrounding various tax attributes and ensure a relatively near term, and meaningful, distribution to the Debtors’ unsecured creditors. As well, the Proposed Objection

Deadline is appropriate and will provide ample opportunity for parties in interest to consider the 9019 Motion and formulate any responses thereto.

12. The Committee has informed the Debtors that it supports the Motion to hear the 9019 Motion on an expedited basis.

NOTICE

13. Notice of this Motion has been given to (i) Pegasus Communications Corporation; (ii) the Office of the United States Trustee for the District of Maine; (iii) counsel to the Committee; (iv) the United States Attorney for the District of Maine; and (v) all parties on the All Notices List as required by (and as defined in) this Court's Order Establishing Case Management Procedures and Hearing Schedule, dated July 9, 2004 (the "Case Management Order"). The Debtors submit that in light of the Case Management Order and the nature of the relief requested, no further notice is required.

NO PRIOR REQUEST

14. No previous request for the relief sought herein has been made by the Debtors to this or any other court.

WHEREFORE, the Debtors respectfully request that the Court enter an Order, substantially in the form attached hereto as Exhibit A, granting the relief requested herein and such other and further relief as the Court may deem just and proper.

Dated: Portland, Maine
April 18, 2005

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EXHIBIT A

Form of Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

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

ORDER GRANTING MOTION FOR EXPEDITED HEARING

Upon the motion (the “Motion”) of Pegasus Satellite Television, Inc. and certain of its subsidiaries and affiliates, each a debtor and debtor-in-possession herein (collectively, the “Debtors”),¹ requesting entry of an order pursuant to Rule 9013-1(i) of the District of Maine Local Bankruptcy Rules granting an expedited hearing on the Debtors’ motion to approve a stipulation and order Pursuant to 11 U.S.C. §§ 105(a) and 505(a) and Bankruptcy Rule 9019 (the “9019 Motion”); and it appearing that the Court has jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been given; and it appearing that the relief requested in the Motion is in the best

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interests of the Debtors and their estates and creditors; and after due deliberation and sufficient cause appearing therefor; it is hereby

ORDERED, that the Motion is granted; and it is further

ORDERED, that an expedited hearing on the 9019 Motion will be held on May 4, 2005 at 2:00 p.m. (prevailing Eastern time); and it is further

ORDERED, that any objections or responses to the 9019 Motion must be filed by April 29, 2005 at 4:00 p.m. (prevailing Eastern time).

Dated: _____, 2005

THE HONORABLE JAMES B. HAINES, JR.
UNITED STATES BANKRUPTCY JUDGE