

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MAINE**

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

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**JOINT MOTION OF AKIN GUMP STRAUSS HAUER & FELD LLP AND THE  
OFFICE OF THE UNITED STATES TRUSTEE FOR ENTRY OF AN ORDER  
ADJOURNING THE HEARING ON THIRD AND FINAL APPLICATION OF AKIN  
GUMP STRAUSS HAUER & FELD LLP, CO-COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF  
COMPENSATION AND FOR THE REIMBURSEMENT OF EXPENSES**

TO: THE HONORABLE W. JAMES B. HAINES, JR.,  
CHIEF UNITED STATES BANKRUPTCY JUDGE:

Akin Gump Strauss Hauer & Feld LLP (“Akin Gump”), co-counsel to the Official Committee of Unsecured Creditors (the “Committee”) of Pegasus Satellite Television, Inc., et al.<sup>1</sup> (collectively, the “Debtors”) and the Office of the United States Trustee (the “US Trustee”) hereby file this motion (the “Motion”) for entry of an order adjourning the hearing on the Third and Final Application of Akin Gump Strauss Hauer & Feld LLP, Co-Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses (the “Fee Application”). In support of this Motion, Akin Gump and the US Trustee respectfully represents as follows:

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<sup>1</sup> 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.

## **BACKGROUND**

1. On June 2, 2004 (the “Petition Date”), each of the Debtors filed with this Court a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

2. On June 10, 2004 (the “Committee Formation Date”), pursuant to section 1102 of the Bankruptcy Code, the US Trustee appointed the Committee, which was reconstituted from time to time during the chapter 11 cases. On June 14, 2004, the Committee selected Akin Gump as its lead counsel and Pierce Atwood LLP to serve as co-counsel to the Committee

3. On June 25, 2004, the Committee filed an Application to Employ Akin Gump as co-counsel to the Committee *Nunc Pro Tunc* to June 2, 2004 (the “Akin Gump Retention Application”). On July 13, 2004, this Court entered an order approving the Akin Gump Retention Application.

4. On May 5, 2005 (the “Effective Date”), the Debtors’ First Amended and Restated Joint Chapter 11 Plan (the “Plan”) became effective.

5. On June 20, 2005, in accordance with the terms of the Plan, Akin Gump filed the Fee Application.

6. On July 12, 2005, the US Trustee filed an objection to the Fee Application (the “UST Objection”).

7. On September 16, 2005, Akin Gump filed a response to the UST Objection (the “Akin Gump Response”).

8. A hearing on the Fee Application is currently scheduled for September 22, 2005.

## **RELIEF REQUESTED**

9. By this Motion, Akin Gump and the US Trustee jointly request the entry of an order of this Court adjourning the hearing on the Fee Application currently scheduled for

September 22, 2005 to October 11, 2005, the next scheduled hearing date before this Court in these cases. Akin Gump and the US Trustee respectfully submit that the short adjournment of the hearing may provide the parties with a sufficient period of time to resolve the issues related to the Fee Application without the need for this Court to hear a contested matter at the October 11 hearing.

10. Akin Gump has been advised that the Liquidating Trustee appointed in these cases does not object to the adjournment of the hearing on the Fee Application.

WHEREFORE, for the foregoing reasons, Akin Gump and the US Trustee respectfully request that the Court, (i) adjourn the hearing on the Fee Application until October 11, 2005 and (ii) grant Akin Gump and the US Trustee such other and further relief as the Court deems just, proper and equitable.

Dated: Portland, Maine  
September 21, 2005

**AKIN GUMP STRAUSS HAUER & FELD LLP**

/s/ David H. Botter

Daniel H. Golden  
David H. Botter  
590 Madison Avenue  
New York, New York 10022-2524  
(212) 872-1000

PHOEBE MORSE

United States Trustee

/s/ Eric K. Bradford

Eric K. Bradford BBO#5602341  
United States Department of Justice  
Thomas P. O'Neill Jr. Federal Bldg.  
10 Causeway Street, Room 1184  
Boston, MA 02222  
(617) 788-0415