

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE**

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

**AGREED UPON MOTION FOR FOURTH ENLARGEMENT OF
TIME TO FILE OBJECTION TO CERTAIN CLAIMS**

With the consent of Michael B. Jordan, Trustee under Deed of Trust of Marshall W. Pagon, Settlor (the “Insurance Trustee”), Pegasus Satellite Television, Inc. and its subsidiaries and certain of its affiliates, each a Reorganized Debtor herein (collectively, the “Reorganized Debtors”)¹ and the Liquidating Trustee of The PSC Liquidating Trust (the “Liquidating Trustee”), hereby move for a fourth enlargement of time to object to the claims filed by the Insurance Trustee (collectively, the “Split Dollar Claims”). Pursuant to the Reorganized Debtors’ First Amended Joint Plan of Reorganization, the Claims Objection Deadline was October 2, 2005. Pursuant to prior agreed orders of this Court, the deadline for filing objections to the Split Dollar Claims was extended to January 15, 2006. The parties have agreed to set April 1, 2006, as the deadline for filing objections to the Split Dollar Claims. In support of the Motion, the Reorganized Debtors and the Liquidating Trustee respectfully represent as follows:

¹ The Reorganized 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 Country 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.

1. On June 2, 2004, the Reorganized Debtors filed petitions for relief under chapter 11 of the Bankruptcy Court in the United States Bankruptcy Court for the District of Maine (the “Court”). On June 4, 2004, the Court entered an order directing joint administration of the Reorganized Debtors’ cases for procedural purposes only.

2. On April 15, 2005, the Court entered an order (“Confirmation Order”) confirming the Reorganized Debtors’ First Amended Joint Plan of Reorganization and the Plan became effective on May 5, 2005 (the “Effective Date”). Pursuant to the Plan and Confirmation Order, Ocean Ridge Capital Advisors, LLC was appointed the Liquidating Trustee of The PSC Liquidating Trust established under the Plan.

3. Pursuant to section 1.30 of the Plan, the last day for filing and serving objections to claims other than administrative claims and fee claims is one hundred and fifty (150) days after the Effective Date (the “Claims Objection Deadline”). Pursuant to section 1.30, the original Claims Objection Deadline was October 2, 2005. Section 1.30 of the Plan grants the Bankruptcy Court authority to extend the Claims Objection Deadline.

4. The Insurance Trustee filed a proof of claim against Reorganized Debtor Pegasus Satellite Communications, Inc., that was assigned claim number 668 and a first amended proof of claim that was assigned claim number 1159. Pursuant to a stipulation entered into by the Liquidating Trustee and the Insurance Trustee, on August 10, 2005, the Insurance Trustee filed a second amended claim that was assigned claim number 1208.

5. On September 30, 2005, the Reorganized Debtors and the Liquidating Trustee filed an agreed to motion to extend the time to object to the Split Dollar Claims (Docket No. 1733). Pursuant to the order of this Court dated October 3, 2005 (Docket No. 1737), the deadline for objecting to the Split Dollar Claims was extended to October 7, 2005. Pursuant to the order of this Court dated October 7, 2005 (Docket No. 1745), the deadline for objecting to the Split Dollar Claims was further extended to October 21, 2005. Pursuant to the order of this

Court dated October 21, 2005 (Docket No. 1760), the deadline for objecting to the Split Dollar Claims was further extended to January 15, 2006.

6. The Reorganized Debtors and the Liquidating Trustee request, with the consent of the Insurance Trustee, that the Court exercise its discretion to further extend the deadline for objecting to the Split Dollar Claims to April 1, 2006, as permitted by the Plan. The undersigned counsel and Liquidating Trustee require additional time to review the Split Dollar Claims and to engage in negotiations with the Insurance Trustee to resolve objections to the Split Dollar Claims as part of a global settlement among the Liquidating Trustee, PCC, and various related entities. Therefore, the Reorganized Debtors and the Liquidating Trustee request that the Court grant the requested extension in order to allow negotiations to proceed on a consensual and informal basis. The Reorganized Debtors and the Liquidating Trustee further note that the enlargement requested will not unduly delay the progress of the claims review process or the administration of the Debtors' estates as only a handful of disputed claims remain open.

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WHEREFORE, with the consent of Michael B. Jordan, Trustee under Deed of Trust of Marshall W. Pagon, Settlor, the Reorganized Debtors and the Liquidating Trustee request that the Court grant an enlargement of the time for filing objections to the Split Dollar Claims to April 1, 2006, and such other, further relief as the Court deems just.

Respectfully submitted,

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-and-

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*Counsel to the Reorganized Debtors and the
Liquidating Trustee of The PSC Liquidating
Trust*

Dated: January 10, 2006

Certificate of Service

Service of the above agreed-upon motion has been made through the Court's ECF system on all those registered to receive ECF service.

date: 1/10/06

/s/John P. McVeigh