

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MAINE

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

**MOTION TO SHORTEN OBJECTION PERIOD OF DEBTORS’ MOTION FOR ENTRY OF AN ORDER PURSUANT TO 11 U.S.C. §§ 105(a), 363 AND 1146(c) AND BANKRUPTCY RULE 9019 (I) APPROVING GLOBAL SETTLEMENT BY AND AMONG THE DEBTORS AND DEBTORS IN POSSESSION, PEGASUS COMMUNICATIONS CORPORATION AND OTHER NON-DEBTOR AFFILIATES, DIRECTV, INC., THE DIRECTV GROUP, INC., NATIONAL RURAL TELECOMMUNICATIONS COOPERATIVE, AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, AND (II) AUTHORIZING AND APPROVING IN CONNECTION THEREWITH A SALE, TRANSFER AND CONVEYANCE OF CERTAIN ASSETS OF THE DEBTORS TO DIRECTV, INC.**

Pegasus Satellite Television, Inc. and certain of its subsidiaries and affiliates, each a debtor and debtor-in-possession herein (collectively, the “Debtors”),<sup>1</sup> hereby file this motion (the “Motion”) requesting entry of an order pursuant to Rule 6004-1(c) of the D. Me. LBR shortening the period by which parties may object to the Debtors’ motion for entry of an order pursuant to 11 U.S.C. §§ 105(a), 363 and 1146(a) and Bankruptcy Rule 9019 (i) approving a global settlement by and among the Debtors, Pegasus Communications Corporation and other non-Debtor affiliates, DIRECTV, Inc., The DIRECTV Group, Inc., National Rural

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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.

Telecommunications Cooperative, and the Official Committee of Unsecured Creditors, and (ii) authorizing and approving in connection therewith a sale, transfer and conveyance of certain assets of the Debtors to DIRECTV, Inc (the “Global Settlement/Sale 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 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 the Committee pursuant to section 1102(a) of the Bankruptcy Code.

4. No request has been made for the appointment of a trustee or examiner in these cases. 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 predicate for the relief sought herein is Rule 6004-1(c) of the D. Me. LBR.

### **RELIEF REQUESTED**

5. On the date hereof, the Debtors filed the Global Settlement/Sale Motion, pursuant to 11 U.S.C. §§ 105(a), 363 and 1146(a) and Fed. R. Bankr. P. 9019.

6. A hearing on the Global Settlement/Sale Motion has been scheduled for August 25, 2004 at 10:30 a.m. (prevailing Eastern time) (the "Hearing"). The Debtors are requesting an objection deadline to the Global Settlement/Sale Motion of August 20, 2004 at 5:00 p.m. (prevailing Eastern time) (the "Proposed Objection Deadline").

7. D. Me. LBR 6004-1(c) provides with respect to the objection deadline for a proposed sale of the Debtors' property outside of the ordinary course of business: "In no event shall that deadline provide for less than twenty (20) days within which to file objections without a court order shortening the notice period."

8. The Debtors submit that the Proposed Objection Deadline is appropriate and will provide ample opportunity for parties in interest to consider the Global Settlement/Sale Motion and formulate any responses thereto, while allowing the Debtors sufficient time to respond, if necessary, to any objections prior to the Hearing.

### **NOTICE**

9. Notice of this Motion has been given to (i) the Office of the United States Trustee for the District of Maine; (ii) counsel to the Committee and the members thereto; (iii) administrative agents to the Debtors' prepetition credit facilities; (iv) counsel to the indenture trustees; (v) the prepetition senior secured lenders and their respective counsel; (vi) the prepetition junior secured lenders and their respective counsel; (vii) counsel to DIRECTV; (viii)

counsel to Pegasus Communications Corporation; (ix) counsel to NRTC; and (x) all entities who have filed a notice of appearance or request for service of papers pursuant to Fed. R. Bankr. P. 2002. The Debtors submit that in light of this Court's Order Establishing Notice and Service Requirements in these Chapter 11 Cases dated June 7, 2004, and the nature of the relief requested, no further notice is required.

**NO PRIOR REQUEST**

10. 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 granting the relief requested herein and grant such other and further relief as the Court may deem just and proper.

Dated: Portland, Maine  
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