

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

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

UNOPPOSED PRECAUTIONARY MOTION OF THE STEERING COMMITTEE
OF SENIOR SECURED CREDITORS FOR LEAVE TO FILE
MOTION IN EXCESS OF PAGE LIMIT

The steering committee (the “Steering Committee”) of pre-petition senior secured lenders, by and through counsel, hereby moves this Court for leave to file a Motion for an Order Pursuant to Section 506(b) of the Bankruptcy Code for Allowance and Payment of (I) Default Interest and (II) Prepayment Amounts (the “Section 506 Motion”) in excess of 15 pages. The reasons for this motion are as follows:

1. The Section 506 Motion is in excess of 15 pages. Paragraph B(1)(e) of the Order Establishing Case Management Procedures and Hearing Schedule, entered by this Court on July 9, 2004 (the “Procedural Order”) provides, in part, that “ unless otherwise ordered by the Court, upon good cause shown, briefs in support or in response to Motions initiating contested matters shall not exceed (15) pages...” While the Steering Committee believes that this provision of the Procedural Order does not apply to the Section 506 Motion itself but only briefs filed in support, out of an abundance of caution, the Steering Committee seeks an order allowing the Steering Committee to file the Section 506 Motion up to a maximum of 50 pages (excluding exhibits).

2. As described more fully in the Section 506 Motion, the secured lenders whose interests are represented by the Steering Committee are oversecured, and thus have a right under section 506(b) of the United States Bankruptcy Code (the “Code”) to recover both interest on their secured claim, and any reasonable fees, costs or charges provided for under the agreement giving rise to their claim.

3. The Steering Committee’s Section 506 Motion, which seeks, *inter alia*, an order authorizing payment of post-petition interest at the contractual default rate, raises a number of complex legal issues (and some factual issues) which the Steering Committee cannot adequately address in a motion of only 15 pages.

4. Cause exists for the Court to allow the Steering Committee to file a motion up to 50 pages (exclusive of exhibits), because a motion of that length will permit the Steering Committee to clearly and thoroughly explain to the Court and other interested parties the bases for the Section 506 Motion and why the relief sought in the Section 506 Motion should be granted under applicable law, thereby facilitating the Court’s resolution of this matter.

5. Counsel for both the Debtor and the Official Committee of Unsecured Creditors have no objection to this motion.

Dated: October 15, 2004

Respectfully submitted,

/s/ Benjamin E. Marcus
Benjamin E. Marcus, Esq.

Counsel for the Steering Committee of
Senior Secured Creditors

Drummond Woodsum & MacMahon
245 Commercial Street
P.O. Box 9781
Portland, Maine 04104-5081