

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 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 pursuant to D. Me. LBR 9013-1(i), moves this Court for an order granting an expedited hearing on the Motion of the Debtors and Debtors In Possession Pursuant to 11 U.S.C. Section 365(a) of the Bankruptcy Code for an Order Approving the Debtors’ Rejection of Certain Unexpired Leases and Executory Contracts and Notice Procedures for Fixing the Rejection Effective Date of Certain Unexpired Leases and Executory Contracts (the “Motion”). In support of this Motion, the Debtor states as follows:

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.

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

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. 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 predicates for the relief requested herein are section 365(a) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 6006.

4. The Debtors submit that expediting the hearing on the Motion is in the best interests of the Debtors' estates, its creditors and other parties in interest. Specifically, holding a hearing on the Motion on an expedited basis will allow the Debtors to seek judicial approval to reject certain leases and executory contracts as early as possible, thus minimizing unnecessary administrative expenses for the benefit of their estates and creditors.

5. Notice of this Motion has been given to (i) each of the non-debtor parties to the Leases; (ii) each of the non-debtor parties to the Contracts; (iii) the Office of the United States Trustee; and (iv) 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 Debtors submit that in light of this Court's Order Establishing Notice and Service Requirements in these Chapter 11 Cases dated July 9, 2004, and the nature of the relief requested, no further notice is required.

WHEREFORE, the Debtor respectfully requests that this Honorable Court enter an order scheduling an expedited hearing on the Motion on November 8, 2004 at 10:30 a.m. (EST) in Portland, Maine, and granting such further relief as the Court deems just and appropriate.

Dated: Portland, Maine
October 25, 2004

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