

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

The steering committee (the “Steering Committee”) of pre-petition secured lenders, by and through counsel, hereby moves this Court for leave to file a Response to Official Committee of Unsecured Creditors’ Objection to (I) Motion of the Steering Committee of the Secured Lenders for an Order Pursuant to Section 506(b) of the Bankruptcy Code for Allowance and Payment of (A) Default Interest and (B) Prepayment Amounts, and (II) Motion for an Order Directing Payment of Prepayment Premium, Accrued Default Interest and Interest Thereon Under the Pegasus Junior Term Loan Agreement (the “Response”) in excess of the 5-page limit established in paragraph B(1)(e) of this Court’s July 9, 2004 Order Establishing Case Management Procedures and Hearing Schedule. In particular, the Steering Committee requests leave to file a reply memorandum of not more than 25 pages. The reasons for this Motion are as follows:

1. As described more fully in the Motion of the Steering Committee of the Secured Lenders for an Order Pursuant to Section 506(b) of the Bankruptcy Code for Allowance and Payment of (A) Default Interest and (B) Prepayment Amounts, and (II)

Motion for an Order Directing Payment of Prepayment Premium, Accrued Default Interest and Interest Thereon Under the Pegasus Junior Term Loan Agreement (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, including default interest and prepayment premiums.

2. On October 29, 2004, the Official Committee of Unsecured Creditors filed a 36 page objection (the “Committee Objection”) objecting to the relief requested in the Section 506 Motion. The Committee Objection raises a number of issues which the Steering Committee cannot adequately address in a memorandum of only 5 pages.

3. Cause exists for the Court to allow the Steering Committee to file a response of up to 25 pages (exclusive of exhibits) to address the issues raised by the Committee Objection because a reply of that length will permit the Steering Committee to clearly and thoroughly respond to the Objection and explain to the Court and other interested parties the bases for the Section 506 Motion, why the Section 506 Motion should be granted under applicable law and the Committee Objection should be overruled in its entirety, thereby facilitating the Court’s resolution of this matter.

4. The Official Committee of Unsecured Creditors consents to the relief requested in this Motion.

Dated: November 4, 2004

Respectfully submitted,

/s/ Benjamin E. Marcus
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Senior Secured Creditors

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