

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MAINE

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

MOTION FOR EMERGENCY HEARING

NOW COMES Felton Street Associates Limited Partnership (“Felton Street”), by and through its undersigned attorneys, and moves this Court pursuant to Local Rule 9013-1(j) for an emergency hearing on its Motion for Reconsideration of Order Authorizing the Debtors to (i) Employ Garcel, Inc. d/b/a The Great American Group as a Liquidation and Auction Consultant as of November 5, 2004 and (ii) Sell Certain Assets Outside of the Ordinary Course of Business (CM/ECF #722) as it relates to the Marlborough Facility, and in support thereof states the following:

1. The Debtors moved, on an expedited basis, for an order authorizing the sale of certain assets of the estate including, but not limited to, fixtures and other assets owned by Felton Street regarding certain commercial real estate located in High Ridge Business Center, 123 Felton Street, Marlborough, Massachusetts (the “Premises”).

2. Felton Street is the owner of the Premises and leased a portion of the Premises to Pegasus Satellite Television, one of the Debtors in the above-referenced action, by commercial lease dated February 25, 2000 (the “Lease”). The Lease does not terminate under its provisions until September 30, 2007.

3. The Debtor has obtained an order authorizing the sale of certain property which includes fixtures and other property located at the Premises as set forth in the Order (CM/ECF #722).

4. If the Court does not grant the Motion for Emergency Hearing, Felton Street will suffer unreasonable and irrevocable harm and will be unduly prejudiced by the sale of fixtures, assets and other interests subject to the Lease or otherwise owned by Felton Street.

5. The basis for this motion is more specifically set forth in the Motion for Reconsideration filed concurrently with this motion.

WHEREFORE, Felton Street respectfully requests that this Court grant the Motion for Emergency Hearing and schedule a hearing on the Motion to Reconsider on November 19, 2004 at 1:30 p.m. and to also limit notice to those parties who have entered their appearance by the electronic court filing ("ECF") system and grant such other and further relief as may deemed just and proper.

Dated at Portland, Maine this 16th day of November, 2004.

LAMBERT COFFIN

/s/Bruce B. Hochman, Esq.
Local Counsel for Felton Street Associates
Limited Partnership

Lambert Coffin
PO Box 15215
Portland, ME 04112-5215
(207)874-4000

/s/ Kenneth E. Aaron, Esq.
Counsel for Felton Street Associates
Limited Partnership

Weir & Partners, LLP
842 Market Street Mall, Suite 1001
Wilmington, Delaware 19801
(215) 241-7727