

DOCKET NO. 77

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X
 In re : Chapter 11
 :
 RCN CORPORATION, et al., : Case No. 04-13638 (RDD)
 :
 :
 Debtors. : (Jointly Administered)
 -----X

AFFIDAVIT OF MAILING

STATE OF NEW YORK)
) ss.:
 COUNTY OF NEW YORK)

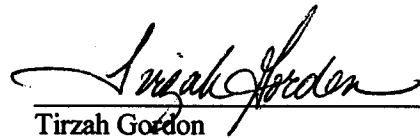
TIRZAH GORDON, being duly sworn, deposes and says:

1. I am over the age of eighteen years and employed by Bankruptcy Services LLC, 757 Third Avenue, New York, New York and I am not a party to the above-captioned action.
2. On June 23, 2004, I caused to be served the following:
 - a) "Final Order (I) Authorizing the Use of Lenders' Cash Collateral and (II) Granting Adequate Protection Pursuant to 11 U.S.C. §§ 361 and 363" dated June 22, 2004 (the "Cash Collateral Order"),
 - b) "Order Under 11 U.S.C. §§ 105(a), 363(b), 364(c)(1), 503(b) and 507 Authorizing, Approving and Ratifying Exit Financing Commitments and Payment of Related Fees and Expenses" dated June 22, 2004 (the "Financing Order"),
 - c) "Final Order Under 11 U.S.C. §§ 327(a) and 328(a) and Fed.R.Bankr.P. 2014 and 2016 Authorizing Retention of PricewaterhouseCoopers LLP As Auditors for the Debtors" dated June 22, 2004 (the "PwC Retention Order"),
 - d) "Final Order Under 11 U.S.C. §§ 327(e), 328, and 1107 and Fed.R.Bankr.P. 2014 and 2016 Authorizing Retention of Swidler Berlin Shereff Freidman, LLP As Special Regulatory Counsel to the Debtors" dated June 22, 2004 (the "Swidler Retention Order"),
 - e) "Final Order Under 11 U.S.C. §§ 327(a) and 329 and Fed.R.Bankr.P. 2014 and 2016 Authorizing Retention of Skadden, Arps, Slate, Meagher & Flom LLP As Attorneys for Debtors" dated June 22, 2004 (the "Skadden Retention Order"),
 - f) "Administrative Order Under 11 U.S.C. §§ 105 and 331 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals" dated June 22, 2004, (the "Interim Compensation Order"), and

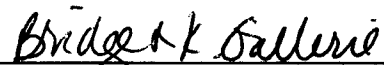
- g) "Order Under 11 U.S.C. §§ 105 and Fed.R.Bankr.P. 2002(a)(7) and 3003(c)(3) (I) Setting Bar Dates for Filing Certain Proofs of Claim, (II) Approving Procedures for Filing Such Proofs of Claim, and (III) Approving Form, Manner, and Sufficiency of Notice Thereof" dated June 23, 2004 (the "Bar Date Order")

by causing true and correct copies, enclosed securely in separate, postage pre-paid envelopes of the following:

- i. Cash Collateral Order, Financing Order, PwC Retention Order, Swidler Retention Order, Skadden Retention Order, Interim Compensation Order and Bar Date Order, to be delivered by first class mail to those parties listed on the annexed Exhibit "A", and
- ii. Cash Collateral Order, to be delivered by first class mail to those parties listed on the annexed Exhibit "B".


Tirzah Gordon

Sworn to before me this
25th day of June, 2004


Notary Public

BRIDGET K. GALLERIE
Notary Public, State Of New York
No. 01GA6056813
Qualified In New York County
Commission Expires April 2, 20 07

EXHIBIT "A"

Name	Address
ANDREWS KURTH LLP	ATTN: PETER S. GOODMAN, ESQ. (COUNSEL TO WELLS FARGO AND COMPANY) 450 LEXINGTON AVENUE NEW YORK NY 10017
ARNALL GOLDEN GREGORY LLP	ATTN: FRANK N. WHITE, ESQ., DARRYL S. LADDIN, ESQ. (COUNSEL TO VERIZON OPERATING TELEPHONE COMPANIES) 2800 ONE ATLANTIC CENTER 1201 W. PEACHTREE STREET ATLANTA GA 30309-3450
BLACKWELL SANDERS PEPPER MARTIN LLP	ATTN: RICHARD M. BEHELER 2300 MAIN STREET, SUITE 1000 KANSAS CITY MO 64108
BLANK ROME LLP	ATTN: MICHAEL S. SIMON, ESQ. (COUNSEL FOR HUDSON TELEGRAPH ASSOCIATES, L.P.) 405 LEXINGTON AVENUE NEW YORK NY 10174
CITY OF CHICAGO	ATTN: ESTHER E. TRYBAN TELSER CITY OF CHICAGO DEPARTMENT OF LAW 30 N. LASALLE; ROOM 900 CHICAGO IL 60602
FEDERAL COMMUNICATIONS COMMISSION	445 12TH STREET, SW WASHINGTON DC 20554
FALPERIN & ASSOCIATES	ATTN: ALAN D. HALPERIN, ESQ., ETHAN D. GANC, ESQ. 555 MADISON AVENUE - 9TH FLOOR NEW YORK NY 10022
HSBC BANK USA	ATTN: MS. SANDRA E. HORWITZ 452 FIFTH AVENUE NEW YORK NY 10018-2706
HSBC BANK USA, AS INDENTURE TRUSTEE	ATTN: ISSUER SERVICES 452 FIFTH AVENUE NEW YORK NY 10018
INTERNAL REVENUE SERVICE	INSOLVENCY UNIT 290 BROADWAY, 5TH FLOOR NEW YORK NY 10007
KELLEY DRYE & WARREN LLP	ATTN: DAVID E. RETTER, ESQ., DEBRA SUDOCK, ESQ. (COUNSEL TO HSBC BANK USA, AS INDENTURE TRUSTEE) 101 PARK AVENUE NEW YORK NY 10178
KELLEY DRYE & WARREN LLP	ATTN: MARK R. SOMERSTEIN, ESQ. ANNE H. PAK, ESQ. (COUNSEL TO HSBC BANK USA, AS COLLATERAL AGENT) 101 PARK AVENUE NEW YORK NY 10178
LOWENSTEIN SANDLER PC	(ATTORNEYS FOR AT&T) ATTN: VINCENT A. D'AGOSTINO, ESQ. 65 LIVINGSTON AVENUE ROSELAND NJ 07068
MICHAEL A. CORDOZO	CORPORATION COUNSEL OF THE CITY OF NEW YORK ATTN: GABRIELA P. CACUCI, ESQ. 100 CHURCH STREET NEW YORK NY 10007
MILBANK, TWEED, HADLEY & MCCLOY LLP	ATTN: DENNIS DUNNE, ESQ. 1 CHASE MANHATTAN PLAZA NEW YORK NY 10005
MILBANK, TWEED, HADLEY & MCCLOY LLP	ATTN: DEIRDRE A. SULLIVAN, ESQ. 1 CHASE MANHATTAN PLAZA NEW YORK NY 10005
MORRISON & FOERSTER LLP	ATTN: JASON C. DIBATTISTA, ESQ. (COUNSEL TO A&E TELEVISION NETWORKS) 1290 AVENUE OF THE AMERICAS NEW YORK NY 10104
MELVENY & MYERS LLP	ATTN: BEN H. LOGAN, ESQ. EMILY CULLER, ESQ. (COUNSEL TO VULCAN VENTURES CAPITAL) 400 SOUTH HOPE STREET LOS ANGELES CA 90071-2899
MATTERSON, BELKNAP, WEBB & TYLER LLP	ATTN: DAVID W. DYKHOUSE (COUNSEL TO DOLP 1133 PROPERTIES LLC) 1133 AVENUE OF THE AMERICAS NEW YORK NY 10036-6710
PAUL, HASTINGS, JANOFFSKY & WALKER LLP	ATTN: MICHAEL K. CHERNICK, ESQ. 75 E. 55TH STREET, FIRST FLOOR NEW YORK NY 10022
PAUL, HASTINGS, JANOFFSKY & WALKER LLP	ATTN: HARVEY A. STRICKON, ESQ. (COUNSEL TO EVERGREEN FUNDS) 75 EAST 55TH STREET NEW YORK NY 10022-3205
RCN CORPORATION	ATTN: GENERAL COUNSEL 105 CARNEGIE CENTER PRINCETON NJ 08540
SECURITIES AND EXCHANGE COMMISSION	233 BROADWAY, SUITE 600 NEW YORK NY 10279
SIMPSON, THACHER & BARTLETT LLP	ATTN: PETER V. PANTALEO, ESQ. 425 LEXINGTON AVENUE NEW YORK NY 10017-3954
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP	ATTN: FREDERICK MORRIS, ESQ. FOUR TIMES SQUARE NEW YORK NY 10036-6522
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP	ATTN: JAY M. GOFFMAN, ESQ. FOUR TIMES SQUARE NEW YORK NY 10036-6522
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP	ATTN: NICHOLAS H. MANCUSO, RM 47-102 FOUR TIMES SQUARE NEW YORK NY 10036-6522
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP	ATTN: STEPHANIE SKELLY, RM 26-413 FOUR TIMES SQUARE NEW YORK NY 10036-6522
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP	ATTN: BRIAN P. KELLY, RM 35-220 FOUR TIMES SQUARE NEW YORK NY 10036-6522
THE OFFICE OF THE UNITED STATES TRUSTEE	ATTN: PAUL K. SCHWARTZBERG, ESQ. 33 WHITEHALL STREET, 21ST FLOOR NEW YORK NY 10004
TUDOR INVESTMENT CORP.	ATTN: DARRYL L. SCHALL, ANALYST 1275 KING STREET GREENWICH CT 06831
UNITED STATES ATTORNEY FOR THE	SOUTHERN DISTRICT OF NEW YORK 33 WHITEHALL STREET, 8TH FLOOR NEW YORK NY 10004
WEINER & LAURIN, LLP	ATTN: PAUL J. LAURIN, ESQ. (COUNSEL TO FOX CABLE NETWORKS GROUP) 15760 VENTURA BLVD., SUITE 1727 ENCINO CA 91436-2152
ZORK CAPITAL MANAGEMENT	ATTN: ERIC EDIDIN 390 PARK AVENUE, 15TH FLOOR NEW YORK NY 10022

EXHIBIT "B"

Name	Address
APPLIED FINANCIAL, INC.	6975 UNION PARK CENTER, SUITE 200 MIDVALE UT 84047
GENERAL ELECTRIC CAPITAL CORPORATION	44 OLD RIDGEBURY ROAD DANBURY CT 06810
HSEC BANK USA, AS AGENT	ISSUER SERVICES 452 FIFTH AVENUE NEW YORK NY 10018
JPMORGAN CHASE BANK, AS AGENT	380 MADISON AVENUE ATTENTION: MARY ELLEN EGBERT NEW YORK, NEW YO NY 10017
MINOLTA BUSINESS SYSTEMS	P.O. BOX 728 PARK RIDGE NJ 07656
PITNEY BOWES CREDIT CORPORATION	27 WATERVIEW DRIVE SHELTON CT 06484
REPUBLIC BANK, INC.	801 NORTH 500 WEST, SUITE 103 WEST BOUNTIFUL UT 84087
WELLS FARGO BANK, N.A.	299 SOUTH MAIN STREET SALT LAKE CITY UT 84111

Total Number of Records Printed 8

DOCKET NO. 414

EXHIBIT A

BEAUMONT, TEXAS

BOWLING GREEN, OHIO

CHARLOTTE, NORTH CAROLINA

CHICOPEE, MASSACHUSETTS

DALLAS, TEXAS

DENVER, COLORADO

DES MOINES, IOWA

HIGHLAND, ILLINOIS

LA GRANGE, GEORGIA

NAPERVILLE, ILLINOIS

ORLANDO, FLORIDA

PALO ALTO, CALIFORNIA

RIVERSIDE, CALIFORNIA

SEATTLE, WASHINGTON

SHARON, PENNSYLVANIA

SOUTH BRUNSWICK, NEW JERSEY

WHITE OAK, MARYLAND

◆ BANKRUPTCIES ◆

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**RCH CORPORATION, et al.,
Debtors.**

**Chapter 11
Case No. 04-13638 (RDD)
(Jointly Administrated)**

NOTICE OF AUGUST 11, 2004 DEADLINE FOR FILING PROOFS OF CLAIM

**TO ALL CREDITORS, EQUITY INTEREST HOLDERS OF THE DEBTORS, AND OTHER PARTIES-IN-INTEREST:
PLEASE TAKE NOTICE OF THE FOLLOWING:**

In accordance with an order entered on June 23, 2004, by the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court"), in the above-captioned Chapter 11 cases (the "Bar Date Order"), 5:00 p.m. Eastern Time on August 11, 2004 (the "General Bar Date"), has been established as the last date for each person or entity (including individuals, partnerships, corporations, joint ventures and trusts) to file a proof of claim in the chapter 11 cases of the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"). A list of all Debtors in these chapter 11 cases is set forth below.

The General Bar Date and the procedures set forth below for filing proofs of claim apply to all claims against the Debtors that arose prior to May 27, 2004 (the "Petition Date"), the date on which the Debtors commenced cases under chapter 11 of the United States Bankruptcy Code, except for equity holders of the claims listed in Section 4 below that are specifically excluded from the General Bar Date filing requirement.

1. WHO MUST FILE A PROOF OF CLAIM. You MUST file a proof of claim to vote on a Chapter 11 plan filed by the Debtors or to share in distributions from the Debtors' bankruptcy estate if you have a claim that arose prior to May 27, 2004, and it is not one of the types of claim described in Section 4 below. Claims based on acts or omissions of the Debtors that occurred before the Petition Date must be filed on or prior to the General Bar Date, and if such claims are not now filed, liquidated or certain or did not mature or become fixed, liquidated or certain before the Petition Date.

Under section 101(b) of the Bankruptcy Code and as used in this Notice, the words "claim" means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

2. WHAT TO FILE. Proof of claim forms may be obtained at <http://www.uscourts.gov/BankruptcyForms>. All proof of claim forms must be signed by the claimant or, if the claimant is not an individual, by a claimant's authorized agent. It must be written in English and be denominated in United States currency. The amount claimed in your completed proof of claim any documents of which the claim is based (if voluminous, attach a summary) or an explanation as to why the documents are not available.

Any holder of a claim against more than one Debtor must file a separate proof of claim with respect to each such Debtor and all holders of claims must identify on their proof of claim the specific Debtor against which their claim is asserted and the case number of that Debtor's bankruptcy case. A list of the names of the Debtors and their case numbers is set forth below.

3. WHEN AND WHERE TO FILE. Except as provided for herein, all proofs of claim must be filed as set forth below on or before 5:00 p.m. Eastern Time on August 11, 2004, at the following address:

If sent by mail:
United States Bankruptcy Court
Southern District of New York
Building Great Station
Rt. Box 5043
New York, New York 10274-5043

If sent by messenger or overnight courier:
United States Bankruptcy Court
Southern District of New York
One Bowling Green
Room 534
New York, New York 10004

Proofs of claim will be deemed filed only when received at the addresses above on or before the General Bar Date. Proofs of claim may not be delivered by registered, telecopy or electronic mail transmission.

Governmental entities that have until November 23, 2004, the date that is 90 days after the order for relief, to file a proof of claim.

4. WHO NEED NOT FILE A PROOF OF CLAIM. You do not need to file a proof of claim as or prior to the General Bar Date if you are:

- Any person or entity that has already filed a proof of claim against the Debtors with the Clerk of the Bankruptcy Court for the Southern District of New York in a form substantially similar to Official Bankruptcy Form 101.
- Any person or entity whose claim is listed on the Schedules filed by the Debtors, provided that (i) the claim is not scheduled as "disputed," "contingent" or "unliquidated"; and (ii) the claimant does not dispute the amount, nature and priority of the claim as set forth in the Schedules; and (iii) the claimant does not dispute that the claim is an obligation of the specific Debtor against which the claim is listed in the Schedules.
- Any holder of a claim that has already been allowed by order of the Court.
- Any person or entity whose claim has been paid in full.
- Any holder of a claim for which specific deadlines have previously been fixed by the Court.
- Any Debtor having a claim against another Debtor or any of the non-Debtor affiliates of RCH Corporation having a claim against any of the Debtors.
- Any holder of a claim allowable under § 503(b) and § 507(a) of the Bankruptcy Code as an administrator or administrator.
- Claims by a holder of a claim in respect of the Debtors' outstanding senior notes (each a "Senior Note"), other than indenture trustees, which include: (i) 10% Senior Notes due 2007; (ii) 10-1/4% Senior Notes due 2010; (iii) 8-1/4% Senior Discount Notes due 2006; (iv) 11% Senior Discount Notes due 2008; and (v) 11-1/8% Senior Discount Notes due 2007 (collectively, the "Senior Notes"). **However, any holder of Senior Notes who wishes to assert a claim against the Debtors that is not based solely upon the outstanding principal and interest due on account of its ownership of such Senior Notes must file a proof of claim on or prior to the General Bar Date in respect of such Debtors.**
- Claims by a holder of a claim arising under or in connection with that certain Credit Agreement, dated as of June 3, 1999 (as amended, supplemented or otherwise modified prior to the Petition Date, and "Credit Agreement") among RCH and certain subsidiaries of RCH, as borrowers; the several lenders party thereto (the "Lenders"); and JPMorgan Chase Bank, as administrative agent and collateral agent for the Lenders (in such capacity, the "Administrative Agent"); and all collateral and ancillary documentation executed in connection with the Credit Agreement (collectively, the "Loan Documents"). **Notwithstanding, however, that the Administrative Agent and any Lender who wishes to assert a claim against the Debtors that does not arise under or, in connection with the Loan Documents, shall file a proof of claim on or prior to the General Bar Date in respect of such claim; and provided further that the Administrative Agent shall be required to file a master proof of claim relating to any claims arising under the Loan Documents, to the extent otherwise required by the Bankruptcy Code, on or before the date that is 35 calendar days after the Debtors provide the Administrative Agent with written notice of its election to require the Administrative Agent to file a proof of claim; and provided further that in that event, as to the Administrative Agent with respect to any such Claims, such date shall be deemed to be the General Bar Date.**

l. Any Governmental Unit (as defined by 11 U.S.C. § 101(27)), which entity shall file any proof of claim in accordance with 11 U.S.C. § 502(b)(7) and

k. Claims by non-Debtor parties to any leased, executory contract or unexpired lease (an "Executory Contract") arising solely from the rejection of such Executory Contract, provided, however, that such Claim shall be filed in accordance with any order of the Court applicable thereto.

In each case, as to such claims of interest:

If you are a holder of an equity interest in the Debtors, you need not file a proof of interest with respect to a corporation of such entity interest in that case. However, if you assert a claim against the Debtors, including a claim relating to such equity interest or the ownership of such interest, a proof of such claim must be filed on or prior to the General Bar Date pursuant to the procedures set forth in this Notice.

This notice is being sent to many persons and entities who have had some relationship with or have do business with the Debtors but may not have a proved claim against the Debtors. The fact that you have received this notice does not necessarily mean that you have a claim or that the Debtors or the Court believe in your claim or claim against the Debtors.

5. EXECUTORY CONTRACTS AND UNEXPIRED LEASES. Any person or entity that has a claim arising from the rejection of an Executory Contract must file a proof of claim by the date set by the order of the Court authorizing such rejection.

6. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE GENERAL BAR DATE. ANY HOLDER OF A CLAIM THAT IS NOT EXCEPTED FROM THE REQUIREMENTS OF THIS ORDER, AS SET FORTH IN SECTION 4 ABOVE, AND THAT FAILS TO TIMELY FILE A PROOF OF CLAIM WITH AN APPROPRIATE FORM WILL BE BARRED FROM ASSERTING SUCH CLAIM AGAINST THE DEBTORS AND THEIR CHAPTER 11 DEBTORS, FROM VOTING ON ANY PLAN OF REORGANIZATION FILED IN THESE CASES, AND FROM PARTICIPATING IN ANY DISTRIBUTION IN THE DEBTORS' CASES ON ACCOUNT OF SUCH CLAIM.

7. THE DEBTORS' SCHEDULES AND AFFIDAVITS THEREON. You may be listed as the holder of a claim against the Debtors in the Debtors' Schedules of Assets and Liabilities and/or Schedules of Executory Contracts if Unliquidated Claims (collectively, the "Schedules"). If you are listed in the Schedules, please refer to the Debtors' Schedules, as set forth below, regarding the nature, amount, and status of your claim as listed in the Debtors' Schedules.

As set forth above, if you agree with the nature, amount and status of your claim as listed in the Debtors' Schedules and if your claim is not scheduled as "disputed," "contingent," or "unliquidated," you need not file a proof of claim. However, if you wish to file a proof of claim, you must do so before the General Bar Date in accordance with the procedures set forth in this Notice.

Copies of the Debtors' Schedules are available for inspection online at <http://www.bkrc.com> or on 1 CD-ROM located at www.uscourts.gov. A login and password to the Court's Public Access Electronic Case Records (PACER) are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.com>. Copies of the Schedules may also be examined between 9 a.m. and 5:00 p.m. Monday through Friday at the Office of the Clerk of the Bankruptcy Court, 9 Bowling Green, Room 511, New York, New York 10004-1406. Copies of the Debtors' Schedules may also be obtained by direct mail request to the Administrative Agent at the address set forth below or (b) upon written request to the Bankruptcy Clerk, U.S. Bankruptcy Court, 9 Bowling Green, New York, NY 10017 or by telephone at (212) 282-2525.

If you have a possible claim against the Debtors, you should consult an attorney regarding any matter not covered by this notice, with or without the notice about the a proof of claim.

Dated: New York, New York
June 23, 2004

**SEAN R. APPS, CLERK
REAGER & FLORES LLP
100 South Street
Franklin D. Morris
Court Tower Room
New York, New York 10038-6522**

Attorney for RCH Corporation, et al., Debtors and Debtors-in-Possession

**TABLE A
Schedule of Debtors**

DEBTOR	ADDRESS	CASE NO.	ESR #
Hot Spot Productions, Inc.	30 West End Avenue, New York, NY 10023	04-13637	11-95581
RCH Corporation	100 Bowling Green, Princeton, NJ 08540	04-13638	22-34965
RCH Property Corporation	100 Bowling Green, Princeton, NJ 08540	04-13639	22-37207
RCH Finance, LLC	100 Bowling Green, Princeton, NJ 08540	04-13640	22-36278
TEC/AL, INC.	100 Bowling Green, Princeton, NJ 08540	04-13641	51-03204

PROOF OF CLAIM NO. 9

LAW OFFICES
HAHALIS & KOUNOUPIS

A PROFESSIONAL CORPORATION
20 EAST BROAD STREET
BETHLEHEM, PENNSYLVANIA 18018

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OUTSIDE PENNSYLVANIA: (800)865-2608
TELEFAX: (610) 691-8418
EMAIL ADDRESS: HKLAW@PTD.NET

PHILADELPHIA OFFICE
230 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19103
TELEPHONE: (610)865-2608

NEW JERSEY OFFICE
1015 NEW DURHAM ROAD
EDISON, NEW JERSEY 08817
TELEPHONE: (732)650-0444

GEORGE A. HAHALIS
(1965-1995)

GEORGE S. KOUNOUPIS*
NANCY S. SKALANGYA
DAVID L. DERATZIAN†

STEVEN D. CAHN †
HAROLD A. PARRA †

* ALSO MEMBER NJ BAR
† MEMBER NJ BAR ONLY
* ALSO MEMBER GREECE BAR

June 23, 2004

Clerk of Courts
United States Bankruptcy Court,
Southern District of New York
P.O. Box 5043
Bowling Green Station
New York, New York 10274-5043

RE: Debra Craig v. RCN Corporation et al.

Dear Sir/Madam:

Please be advised that I represent Ms. Debra Craig in the above referenced matter. Please find enclosed one original and one copy of a Proof of Claim for Ms. Debra Craig. Please time-stamp the copy and return same to me in the envelope provided.

If you have any questions, please do not hesitate to contact me.

Very truly yours,


David L. Deratzian

DLD:laf

DOCKET NO. 276

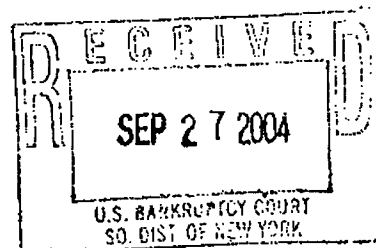
**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE)
) No. 04 B 13638
RCN CORPORATION, et al.)

MOTION TO LIFT STAY

The petitioner, Debra Craig, by her attorneys David L. Deratzian and Hahalis & Kounouis, PC., pursuant to Title 11, section 362(d)(1), respectfully requests this Court to modify the stay entered on May 27, 2004. The petitioner states:

1. Petitioner filed a lawsuit against RCN Corporation and various other defendants in the United States District Court for the Eastern District of Pennsylvania, on or about February 16, 2004 case number 04-cv-671.
2. The basis of the lawsuit is retaliation under Title VII of the Civil Rights Acts of 1964 and 1991.
3. RCN Corporation was named or covered by liability insurance for such claims made by the petitioner in her lawsuit.
4. Upon information and belief, the insurance referred to in paragraph 3 was issued by American International Group Insurance Company.
5. The insurance policy was in full force and effect on the date of the incident.
6. Since petitioner's claim is covered by liability insurance, and the debtor's insurer has assumed full responsibility for defending it, continuation of the Federal Court action should be permitted as the hardship to the petitioner considerably outweighs any hardship to the debtor.



7. Continuation of the Federal Court action would not effect the status of the bankruptcy estate or the debtor and would result in a resolution of the issues, In Re Abrantes Const. Corp., 132 B.R. 234(N.D.N.Y. 1991).
8. Continuation of the Federal Court case does not interfere with the bankruptcy case
9. and does not prejudice the interests of other creditors, In Re Abrantes, 132 B. R. at 237, 238.
10. Continuation of the Federal Court case is in the best interests of judicial economy
11. and the expeditious and economical resolution of litigation, In Re Abrantes, 132 B.R. at 238.
12. Petitioner moves this Honorable Court for the entry of an Order modifying the current stay in this cause so as to permit the continuation of the Federal Court action in the United States District Court for the Eastern District of Pennsylvania,

HAHALIS & KOUNOUPIS, P.C.

By: _____

DAVID L. DERATZIAN, ESQUIRE
NANCY S. SKALANGYA, ESQUIRE
20 East Broad Street
Bethlehem, PA 18018
(610) 865-2608
Attorneys for Plaintiff,
Debra Craig

Dated: September 21, 2004

CERTIFICATE OF SERVICE

The undersigned, an attorney, on oath states that he served a true and complete copy of the foregoing pleading via email on September 21, 2004, and by mailing a copy to Mr. Neal Unger:

Mr. Richard Beheler
2300 Main St, Ste 1000
Kansas City, MO 64108
rbeheler@blackwellsanders.com

Ms. Gabriela Cacuci
NYC Law Dept
100 Church St.
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gcacuci@law.nyc.gov

Mr. Vincent D'Agostino
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vdagostino@lowenstein.com

Mr. Jason DiBattista
1290 Avenue of the Americas
New York, NY 10104
jdbattista@mofa.com

Mr. David Dykhouse
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New York, NY 10036-6710
dwdykhouse@pbwt.com

Mr. Jay Goffman/Mr. Frederick Morris
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jgoffman@skadden.com/fmorris@skadden.com

Mr. Peter Goodman
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New York, NY 10017
pgoodman@andrews-kurth.com

Mr. Alan Halperin
555 Madison Ave., 9th Fl.
New York, NY 10022
ahalperin@halperinlaw.net

Mr. Darryl Laddin
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1201 W Peachtree St.
Atlanta, GA 30309-3450
bkrfilings@agg.com

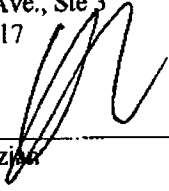
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Mr. Frederick Morris
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Mr. Michael Simon
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New York, NY 10174
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Mr. Harvey Strickon

75 E. 55th St.
New York, NY 10022-3205
harveystrickon@paulhastings.com
Mr. Neal Unger
100 Plainfield Ave., Ste 3
Edison, NJ 08817



David L. Deratzin

DOCKET NO. 392

LAW OFFICES
HAHALIS & KOUNOUPIS

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November 2, 2004

The Honorable Robert D. Drain
United States Bankruptcy Court,
Southern District of New York
Alexander Hamilton Customs House
One Bowling Green
New York, New York 10004-1408

RE: Debra Craig v. RCN Corporation et al.
No.: 04 B 13638

Dear Judge Drain:

Kindly withdraw my Motion to Lift Stay, which was filed on Plaintiff's behalf.

Very truly yours,

David L. Deratzian

DLD:laf
cc: Thomas J. Matz, Esquire

