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March 29, 2005

BY HAND DELIVERY

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: In re RCN Corporation, et al., Case No. 04-13638 (RDD)

Dear Judge Drain:

Set forth below is an agenda for the matters scheduled for the hearing on March 30, 2005 at 10:00 a.m. The information contained in this agenda reflects documents received in our offices as of this morning and information contained on the Court's docket last reviewed this morning.

A. CONTINUED MATTERS

1. NOTICE OF HEARING CONCERNING MOTION FOR ORDER UNDER 11 U.S.C. §§ 105(a), 363(b) AND 365 AUTHORIZING AND APPROVING THE ASSUMPTION OF CERTAIN EXECUTORY CONTRACTS WITH ROYAL & SUNALLIANCE, USA, INC. (Dkt. No. 555)

Status: This matter has been continued by consent of the parties to the hearing on May 24, 2005 at 10:00 a.m. (Objection Deadline: May 19, 2005 at 4:00 p.m.).

B. UNCONTESTED MATTERS

2. NOTICE OF HEARING RELATING TO CLAIM NUMBERS 1509 AND 1510, EACH FILED BY EDWARD T. JOYCE, INDIVIDUALLY AND AS 21ST CENTURY TELECOM GROUP, INC. SHAREHOLDER REPRESENTATIVE, AND OBJECTED TO IN DEBTORS' SECOND OMNIBUS OBJECTION PURSUANT TO 11 U.S.C. §§ 502(b) AND 510(b) AND FED. R. BANKR. P. 3003 AND 3007 (Dkt. No. 528)

Response: RESPONSE OF EDWARD T. JOYCE TO DEBTORS' SECOND OMNIBUS OBJECTION PURSUANT TO 11 U.S.C. §§ 502(b) AND 510(b) AND FED. R. BANK. P. 3003 AND 3007 TO CLAIMS (Dkt. No. 346)

Status: The parties intend to submit a stipulation resolving this matter.

C. CONTESTED MATTERS

3. CREDITOR DEBRA K. CRAIG'S MOTION FOR LIMITED RELIEF FROM PLAN INJUNCTION (Dkt. No. 495)

Objection: OBJECTION OF REORGANIZED RCN TO CREDITOR DEBRA K. CRAIG'S MOTION FOR LIMITED RELIEF FROM PLAN INJUNCTION (Dkt. No. 584)

Status: This matter will be proceeding.

Respectfully submitted,

/s/ Susheel Kirpalani
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