

Presentment Date: May 24, 2005 at 10:00 a.m. (New York Time)

Dennis F. Dunne (DD 7543)
Lena Mandel (LM 3769)
MILBANK, TWEED, HADLEY & M^cCLOY LLP
1 Chase Manhattan Plaza
New York, New York 10005
(212) 530-5000

Attorneys for RCN Corporation, et al.,
Reorganized Debtors

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X			
In re:	:		Chapter 11
	:		
RCN CORPORATION, <u>et al.</u>	:		Case No. 04-13638 (RDD)
	:		
Reorganized Debtors.	:		
-----X			

**NOTICE OF PRESENTMENT OF
STIPULATION AND AGREED ORDER**

PLEASE TAKE NOTICE that at the hearing scheduled for May 24, 2005 at 10:00 a.m. (New York Time), the undersigned, on behalf of RCN Corporation ("RCN"), reorganized debtor and debtor-in-possession in the above-captioned case, will present the attached Stipulation And Agreed Order (the "Stipulation") regarding claim no. 731 of Nicole Robinson to the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 for signature.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the Stipulation, with proof of service, is filed with the Clerk of the Bankruptcy Court, with a courtesy copy delivered to (i) the Bankruptcy Judge's chambers, (ii) the Office of the United States Trustee, Attn: Paul K. Schwartzberg, 33 Whitehall Street, 21st Floor, New York, New York 10004, and (iii) the undersigned counsel for RCN, in all cases so as to be received no later than 5:00 p.m. (New York

Time) on May 16, 2005, there will not be a hearing and the Stipulation may be signed upon presentment to the Bankruptcy Judge.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, a hearing will be held in the United States Bankruptcy Court for the Southern District of New York on May 24, 2005 at 10:00 a.m. (New York Time). The moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

DATED: New York, New York
May 4, 2005

MILBANK, TWEED, HADLEY & M^cCLOY LLP

By: /s/ Lena Mandel
Dennis F. Dunne (DD 7543)
Lena Mandel (LM 3769)
1 Chase Manhattan Plaza
New York, New York 10005
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Reorganized Debtors

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re :
RCN Corporation, et al., : Chapter 11
: Case No.: 04-13638
:

STIPULATION AND AGREED ORDER

RCN Corporation, one of the debtors and debtors in possession in the above-captioned cases (“RCN”), and Nicole Robinson (“Robinson”), hereby stipulate and agree that proof of claim No. 731 filed by Robinson against RCN (“Claim No. 731”) was erroneously expunged by the Order of this Court dated November 17, 2004 (Docket No. 391) that approved the Debtors’ Second Omnibus Objection to Claims Pursuant to 11 U.S.C. §§ 502(b) and 510(b) and Fed. R. Bankr. P. 3003 and 3007 (the “Second Omnibus Objection”). As a result, Claim No. 731 should be reinstated on RCN’s claims docket without prejudice to (a) RCN’s right to object to Claim No. 731 on

any grounds other than those set forth in the Second Omnibus Objection, or (b) Robinson's right to file any responses to such objections.

_____/s/ Lena Mandel_____
Lena Mandel
On behalf of RCN

_____/s/ Cynthia Pollick_____
Cynthia L. Pollick
On behalf of Nicole Robinson

So Ordered _____

ROBERT D. DRAIN,
UNITED STATES BANKRUPTCY JUDGE

Dated: New York, New York
_____, 2005