

United States Bankruptcy Court
Southern District of New York

Ret. October 5, 2005

_____ :
In re :
RCN CORPORATION, et al. :
Debtors, :
Address: 105 Carnegie Center :
Princeton, NJ 08540 :
Employer's Tax Identification :
(EIN) Nos.: 22-349853 :

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

**NOTICE OF MOTION FOR AN ORDER VACATING EXPUNGEMENT ORDER OF
NOVEMBER 16, 2004 AND FOR MODIFYING AUTOMATIC STAY PURSUANT TO 11
U.S.C. SECTION 362(d).**

Creditor, Marie DeWees has filed papers with the court seeking relief from an expungement order dated November 16, 2004 under Bankruptcy Rule 9024 and to lift the automatic stay pursuant to 11 U.S.C. § 362(d) for the purpose of allowing the New Jersey Superior Court to determine the value of any debt by the debtor, RCN Corporation in *Marie D. DeWees v. RCN Corporation, et al.*

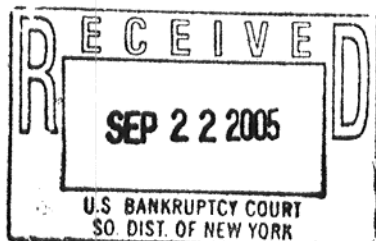
Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in the bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the within motion for relief from the automatic Stay, or if you want the Court to consider your views on the motion, then on or before October 5, 2005, you or your attorney must:

File with a court a written response explaining your position at:

United States Bankruptcy Court, Southern District of New York
One Bowling Green
New York, NY 10004-1408

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.



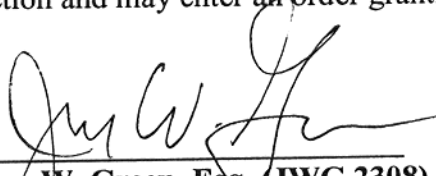
You must also mail a copy to:

Jon W. Green, Esq.
Green & Savits, LLC
35 Airport Road – Suite 350
Morristown, NJ 07960

Attend the hearing scheduled to be held on October 5, 2005 at 10:00 a.m., Courtroom 610, United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York, NY 10004-1408.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: September 21, 2005



Jon W. Green, Esq. (JWG 2308)
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(973) 695-7777

