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#### ATTORNEYS FOR THE DEBTORS

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE:	§ &	
VARTEC TELECOM, INC., et al.,	8 8	CASE NO. 04-81694-HDH-11
DEBTORS.	§ §	(Chapter 11)
	§	(Jointly Administered)

# MOTION FOR SETTING AND REQUEST FOR EXPEDITED HEARING

- 1. The above-referenced debtors and debtors in possession (collectively, the "Debtors")<sup>1</sup> request that a hearing be set on the Motion for Interim and Final Orders (i) Authorizing the Debtors to Obtain Post-Petition Financing on an Interim and Final Basis Secured by Senior Priming Liens, (ii) Scheduling a Final Hearing and Establishing Notice Requirements, and (iv) Granting Related Relief (Rural Telephone Finance Cooperative) (the "Motion") for **October 11, 2005 at 1:30 p.m.**, or at such other time as the Court's docket may accommodate. In the Motion, the Debtors seek approval of a debtor in possession financing facility to enable the Debtors to pay costs associated with the administration of their Cases. An expedited hearing on the Motion is necessary and proper because the Debtors have an immediate need for financing to satisfy the costs of administration of the Cases.
- 2. Notice of the proposed expedited hearing and the Motion will be provided as follows: (a) by electronic service through the Court's ECF service in compliance

<sup>&</sup>lt;sup>1</sup> The Debtors include VarTec Telecom, Inc., Excel Communications Marketing, Inc., Excel Management Service, Inc., Excel Products, Inc., Excel Telecommunications, Inc., Excel Telecommunications of Virginia, Inc., Excel Teleservices, Inc., Excelcom, Inc., Telco Communications Group, Inc., Telco Network Services, Inc., VarTec Business Trust, VarTec Properties, Inc., VarTec Resource Services, Inc., VarTec Solutions, Inc., VarTec Telecom Holding Company, VarTec Telecom International Holding Company, and VarTec Telecom of Virginia, Inc.

with the United States Bankruptcy Court for the Northern District of Texas General Order 2004-06; and (b) by first class United States mail upon the parties listed on the Master Service List that do not receive electronic service.

Dated: September 30, 2005

Respectfully submitted,

### **VINSON & ELKINS L.L.P.**

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By: /s/ Richard H. London

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