

Stephen A. Goodwin  
Peter Tierney  
Jennifer Salisbury  
Jonathan Covin  
Rachel Ragni  
**CARRINGTON, COLEMAN, SLOMAN  
& BLUMENTHAL, L.L.P.**  
200 Crescent Court, Suite 1500  
Dallas, TX 75201  
Tel: 214-855-3000  
Fax: 214-855-1333 Fax: 214-855-1333

*Proposed Attorneys for the Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>In re:</b>	§	<b>Case No. 04-8169-SAF</b>
<b>VARTEC TELECOM, INC., et al.,</b>	§	<b>Chapter 11</b>
	§	
<b>Debtors.</b>	§	

**MOTION FOR EXPEDITED HEARING ON APPLICATION  
FOR INTERIM AND FINAL APPROVAL OF THE EMPLOYMENT  
OF CARRINGTON, COLEMAN, SLOMAN & BLUMENTHAL, L.L.P.,  
EFFECTIVE AS OF NOVEMBER 8, 2004, AS ATTORNEYS FOR THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS**

**TO: THE HONORABLE STEVEN A. FELSENTAL  
UNITED STATES BANKRUPTCY JUDGE**

Carrington, Coleman, Sloman & Blumenthal, L.L.P. (“CCSB”), the proposed counsel for the Official Committee of Unsecured Creditors (the “Committee”) hereby files this Motion for Expedited Hearing on Application for Interim and Final Approval of the Employment of Carrington, Coleman, Sloman & Blumenthal, L.L.P., Effective as of November 8, 2004, as Attorneys for the Official Committee of Unsecured Creditors (the “Motion”), and in support of this Motion respectfully states as follows:

1. On November 1, 2004 (the “Petition Date”), , Inc. (the “Debtor”) filed its voluntary petition for relief under Chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in this Court.

2. Since the Petition Date, the Debtor has continued to operate its business and manage its assets as debtor in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

3. On November 8, 2004 (the “Committee Formation Date”), the United States Trustee appointed an Official Committee of Unsecured Creditors (the “Committee”) in this case. The members of the Committee include: AT&T Corp.; Bell South Corporation; MCI, Inc.; NTS Communications, Inc.; Quest, Inc.; Qwest Corporations; SBC Industry Markets; Specialty Outsourcing Solutions, Ltd.; Telelobe Telecom Corporation; Unipoint Holdings; Valor Telecommunications Enterprises, L.L.C.; and Visionquest Marketing Services, Inc.

4. On the Committee Formation Date, CCSB was selected as counsel for the Committee. The Committee has filed an Application for Interim and Final Approval of the Employment of Carrington, Coleman, Sloman & Blumenthal, L.L.P., Effective as of November 8, 2004, as Attorneys for the Official Committee of Unsecured Creditors (the “Application”), in which the Committee seeks to employ and to retain CCSB as its counsel to perform the legal services that will be necessary during this Chapter 11 case, effective retroactively as of the Committee Formation Date.

5. CCSB’s employment is appropriate and necessary to enable the Committee to execute faithfully its duties and obligations. CCSB therefore respectfully requests that a hearing on the Application be set on November 22, 2004 at 9:30 a.m. (a date on which other matters in this case have been set for hearing).

**WHEREFORE**, CCSB respectfully requests that the Court set an expedited hearing on the Application on November 22, 2004, at 9:30 a.m., and grant such other and further relief as is just and proper.

Dated: November 17, 2004  
Dallas, Texas

Respectfully submitted,

/s/ Stephen A. Goodwin  
Stephen A. Goodwin  
Texas State Bar No. 08186500  
Peter Tierney  
Texas State Bar No. 20023000  
Jennifer Salisbury  
Texas State Bar No. 24007976  
Jonathan Covin  
Texas State Bar No. 24031975  
Rachel Ragni  
Texas State Bar No. 24043882  
CARRINGTON, COLEMAN, SLOMAN  
& BLUMENTHAL, L.L.P.  
200 Crescent Court, Suite 1500  
Dallas, Texas 75201  
(214) 855-3000  
(214) 855-1333 (Fax)

*Proposed Attorneys for the Official Committee  
of Unsecured Creditors*

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that she conferred with Debtors' Counsel regarding the Motion for Expedited Hearing, and the Debtors agreed not to oppose and expedited hearing date of November 22, 2004, at 9:30 a.m.

/s/ Rachel P. Ragni  
Rachel P. Ragni

### **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that, on November 17, 2004, a true and correct copy of the foregoing *Motion* has been served, via ECF and/or regular United States Mail, postage-prepaid, on the parties listed on the Master Service List (*as of November 15, 2004*).

/s/ Rachel P. Ragni

Rachel P. Ragni

610531.1