Daniel C. Stewart, SBT # 19206500 William L. Wallander, SBT # 20780750 Richard H. London, SBT # 24032678 VINSON & ELKINS L.L.P. Trammell Crow Center 2001 Ross Avenue, Suite 3700 Dallas, Texas 75201-2975 Tel: 214.661.7299 Fax: 214.220.7716 VarTec@velaw.com

ATTORNEYS FOR THE DEBTORS

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

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IN RE:

VARTEC TELECOM, INC., et al.,

DEBTORS.

CASE NO. 04-81694-HDH-11

(Chapter 11) (Jointly Administered)

MOTION FOR SETTING AND REQUEST FOR EXPEDITED HEARING

- 1. The above-referenced debtors and debtors in possession (collectively, the "Debtors")¹ request that a hearing be set on the Motion to Further Extend for Forty-Five Days the Exclusive Periods During Which Debtors May File, and Solicit Acceptances of, a Plan and Report Pursuant to Local Bankruptcy Rule 3016.1 [Docket No. 2103] (the "Motion") for **November 22, 2005 at 1:30 p.m.**, or at such other time as the Court's docket may accommodate. In the Motion, the Debtors may file a plan and solicit acceptances thereof. An expedited hearing on the Motion is necessary and proper because the exclusive period within which the Debtors must file a plan expires on November 22, 2005, and as set forth in their Motion, the Debtors believe that cause exists to extend that exclusive period. The Official Committee of Unsecured Creditors supports the relief requested in the Motion.
- 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

¹ 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 electronic mail, facsimile, and overnight delivery, as appropriate, upon the parties listed on the Master Service List that do not receive electronic service.

Dated: November 21, 2005

Respectfully submitted,

VINSON & ELKINS L.L.P.

Trammell Crow Center 2001 Ross Avenue, Suite 3700 Dallas, Texas 75201 Tel: 214.661.7299 Fax: 214.220.7716

By: <u>/s/ Richard H. London</u> Daniel C. Stewart, SBT #19206500 William L. Wallander, SBT #20780750 Richard H. London, SBT #24032678

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