

ORIGINAL

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

In re.

PICUS, INC.  
SYBERCOM, INC.  
iPLUS INTERNET SERVICES, INC.  
INTERNET ENTERPRISE CENTER, INC.

Case No. 00-72059-SCS  
(Jointly Administered)  
  
Chapter 11

Debtors in Possession.

NOTICE OF MOTION  
TO SELL ASSETS FREE AND CLEAR OF LIENS  
AND OUTSIDE OF THE ORDINARY COURSE OF BUSINESS

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC 1 \_\_\_\_\_  
OTH \_\_\_\_\_

**TAKE NOTICE THAT** on October 25, 2002, PICUS, Inc. ("Inc."), and PICUS Communications, LLC ("LLC;" Inc. and LLC are collectively referred to as "PICUS" or the "Debtors") filed a Motion to Sell Assets Free and Clear of Liens and Outside of the Ordinary Course of Business (the "Motion"). This notice provides a summary of the terms of the sale. You should review the Motion with the attachments for a complete description of the terms of the sale. The original of the Motion is filed with the Court and available for inspection at the Court's website at <http://www.vaeb.uscourts.gov/>. Any party desiring a copy may obtain one from the website or may request one from the undersigned.

**Your rights may be affected. You should read the Motion carefully and discuss it with your attorney if you have one. If you do not have an attorney, you may wish to consult one.**

If you do not want the Court to approve the sale described in the Motion, then an objection to the Motion must be filed with and received by the Clerk of the Bankruptcy Court, U.S. Bankruptcy Court, P.O. Box 1938, Norfolk, VA 23501-1938 **within twenty (20) days after service of this Notice**, with a copy to counsel for the Debtors at the address set forth below. If no objection is timely filed, the Court will deem any opposition waived and enter an order without further notice or hearing.

**ASSETS TO BE SOLD:** LLC proposes to sell, **free and clear of all liens**, certain equipment located in 96 central telephone offices ("Collocation Equipment") pursuant to collocation arrangements. A description and the location of the Collocation Equipment is set forth on Schedule 1 attached to the Asset Purchase Agreement, which is attached as Exhibit A to the Motion.

**PROPOSED PURCHASER:** MDU Services, Inc., a Delaware corporation.

**PURCHASE PRICE:** MDU has offered to pay LLC \$2,000.00 for the Collocation Equipment, per central office location, for a potential total of \$ 192,000.00, paid in cash in installments upon each

Frank J. Santoro, Esq., VSB # 20259  
Karen M. Crowley, Esq., VSB # 35881  
Ann B. Brogan, Esq., VSB #25567  
Marcus, Santoro & Kozak, P.C.  
P. O. Box 69  
Portsmouth, VA 23705-0069  
(757) 393-2555  
Counsel for the Debtors

00:06 AM 29 OCT 2002  
DOCUMENT NUMBER-DATE  
DISTRIBUTION CENTER  
1 0611 29 OCT 2002  
FPSC-COMMISSION CLERK

