030632-T.K

ECEIVED-PPSC

in the second

## ORIGINAL

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION

In re:

W.G.I. COMMUNICATIONS, INC.,

AUG 19 AH 9: 2 Case No. 03-05415-881 Chapter 11

Debtor.

## **DEBTOR'S AMENDED MOTION TO EXTEND TIME TO FILE PLAN AND** DISCLOSURE STATEMENT

The Debtor, WGI, (the "Debtor"), by counsel, moves the Court for the entry of an order extending the time within which the Debtor has to file Chapter 11 plan and disclosure statement up to and including Monday, September 15, 2003. In support thereof, the Debtor states the following:

1. On March 18, 2003, the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

2. The Debtor was to file its Plan and Disclosure Statement on or before July 16, 2003.

3. The Debtor's business involves the sale of prepaid local phone service to retail customers using phone lines the Debtor essentially leases from Verizon pursuant to an agreement with Verizon.

4. Due to unanticipated changes in the Debtor's industry, and a substantial reduction in the Debtor's monthly operating revenues, the Debtor has been forced to reevaluate its business model and the feasibility of its Chapter 11 Plan. Moreover, the OTH NONNYR

Hong-original

AUS CAF CMP

COM CTR

ECR GCL OPC

MMS SEC

> DOCUMENT NUMBER-DATE 07640 AUG 198 FPSC-COMMISSION CLERK

Debtor has (or will soon) file motions effectively winding up its Business and concluding its bankruptcy case.

5. On August 5, 2003, this Court entered its Order Denying Motion to Extend Time to File Plan of Reorganization (Docket No. 37), which was without prejudice to the Debtor's right to subsequently seek an extension of time in which to file its Plan.

6. The Debtor files this amended motion to extend time to file a Plan and Disclosure Statement in case circumstances unexpectedly change such that the Debtor can propose a feasible Chapter 11 Plan. The Debtor seeks an extension up to and including Monday, September 15, 2003, in which to file its Plan and Disclosure Statement.

WHEREFORE, based upon the foregoing, the Debtor respectfully requests this Court enter an order extending the deadline by which the Debtor must file its Plan and Disclosure Statement in the above styled matter, up to and including September 15, 2003, and for such further relief as is just and equitable.

DATED this  $14\frac{14}{2}$  day of August, 2003.

S Bomen

David S. Jennis, Esquire Florida Bar No. 775940 Chad S. Bowen, Esquire Florida Bar No. 0138290 Jennis and Bowen, P.L. 400 N. Ashley Dr., Ste. 2540 Tampa, Florida 33601 Telephone: (813) 229-1707 Facsimile: (813) 229-1707 

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Debtor's

Amended Motion to Extend Time to File to File Plan & Disclosure Statement has been

furnished by U.S. Mail to the following parties and to all parties on the attached matrix,

on this  $14^{\cancel{1}}$  day of August, 2003.

.

Office of the United States Verizon Communications, Inc. Trustee 501 East Polk Street Timber Lake Annex, Suite 1200 Tampa, Florida 33602

c/o Luke Sbarra, Esq. 2800 One Atlantic Center 2810 W. Peachtree Street Atlanta, GA 30309-3450

**BMW Financial Services** Rhonda Jewett 5515 Parkcenter Circle Dublin, OH 43014

id the

Chad S. Bowen, Esq.

Label Matrix for USBC Middle District of Florida Case 8:03-bk-05415-TEB Thu Aug 14 11:34:07 EDT 2003

- - -

BMW Financial Services Rhonda L. Jewett 5515 Parkcenter Cir. Dublin, OH 43017

Bmw Financial Services Po Box 78066 Phoenix, Az 85002

Darryl S. Laddin Arnall Golden Gregory LLP 2800 One Atlantic Center 1201 W. Peachtree St. Atlanta, GA 30309-3450

Smart Wireless, Inc. 8216 Waters Ave. W. Tampa, FL 33615

Tampa Electric Co Po Box 111 Tampa, Fl 33601

United States Trustee - TPA 11 Timberlake Annex, Suite 1200 501 E. Polk Street Tampa, FL 33602

W G I Communications Inc 2319 E Hillsborough Ave Tampa, FL 33610 Assistant United States Trustee Timberlake Annex Suite 1200 501 E Polk Street Tampa FL 33602

> BWD Check Cashing 2403 US. Hwy 98 N. Lakeland, FL 33805

Chad S. Bowen 400 N. Ashley Dr., Ste. 2540 Tampa, FL 33602

Office of US Attorney Attn Civil Process Clerk 400 North Tampa St Suite 3200 Tampa FL 33602

State of Florida Dept of Revenue Office of General Council-Bkcy Sec PO Box 6668 Tallahassee FL 32314-6668

The Check Casher, Inc. Attn: Council Rudolph 7613 E. Causeway Blvd.

...

Verizon Communications, Inc. c/o Darryl S. Laddin, Esq. 2800 One Atlantic Center 2801 W. Peachtree ST. Atlanta, GA 30309-3450, 30309-3450

Wireless Unlimited 3434 W. Columbus Ave. Tampa, Fl. 34607 B-thap Llc Brahin Mgmt Corp Joe Savaro Philadelphia, Pa 19102

Denise E Barnett United States Trustee 501 East Polk Street Suite 1200 Tampa, FL 33602

Internal Revenue Service Special Procedures-Stop 5720 400 W Bay Street Suite 35045 Jacksonville FL 32202

Progressive Personnel Mike Bell Po Box 21583 Tampa, Fl 33622

State of Florida-Dept of Labor & Emp Sec Hartman Building Suite 307 2012 Capital Circle Southeast Tallahassee FL 32399-0658

The Flyer Belinda Tuggle Po Box 5059 Tampa, Fl 33675

Verizon Florida Inc Deb Hill Po Box 920041 Dallas, Tx 75392

Your Choice Cellular 11900 Nebraska Ave. Tampa, FL 33612