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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION

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COMMISSION  
CLERK

IN RE:  
EPICUS COMMUNICATIONS  
GROUP, INC.,

CASE NO. 04-34915-BKC-PGH  
CHAPTER 11  
**Jointly Administered**

Debtor.

IN RE:  
EPICUS INC.,

CASE NO. 04-34916-BKC-PGH  
CHAPTER 11

Debtor.

**DEBTOR'S MOTION TO APPROVE ACCOUNT SALE AGREEMENT WITH  
HOV FINANCIAL TO PURCHASE DEBTOR'S ACCOUNTS DELINQUENT  
OVER 120 DAYS**

EPICUS, INC., the Debtor-in-Possession, by and through undersigned counsel, moves the Court for an Order Approving the Account Sale Agreement with HOV Financial Services, LLC ("HOV") for the sale of the Debtor's pre-petition accounts receivable that are delinquent over 120 days and would state as follows:

1. On October 25, 2004, the Debtor initiated this case by filing a Voluntary Petition under Chapter 11 of Title 11 of the United States Code in this Court. The Debtor's parent company, Epicus Communications Group, Inc., filed a Voluntary Petition under Chapter 11 on October 25, 2004 under Case No. 04-34915-BKC-PGH.

2. The Debtor is a telephone services re-seller with facilities in Seminole County, Florida. The Debtor has been operating its business and managing its affairs as a Debtor-in-Possession under the authority of 11 U.S.C. §§1107 and 1108.

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3. The Debtor has certain pre-petition accounts which are over one hundred twenty (120) days delinquent and wishes to sell these delinquent accounts to **HOV FINANCIAL SERVICES, LLC**, (“HOV”) for the sum of \$66,331.43.

4. HOV has agreed to purchase from the Debtor all accounts receivable over 120 days old. Because of the amount of the Debtor’s accounts and the fact that very few of the accounts over 120 days old are ever collected, the Debtor stops billing after four (4) months. Therefore, all accounts that are over 120 days have stopped receiving invoices from the Debtor and there is little chance that the Debtor will receive payment for these accounts.

5. The Debtor has solicited other offers and HOV is willing to pay a higher amount than similar companies for the purchase of these accounts.

6. The accounts which the Debtor is seeking to sell are subject to a lien in favor of Bell South. The Debtor has requested Bell South’s consent to the sale, and to an apportionment of the sale proceeds, but has not yet received consent.

7. A copy of the Account Sale Agreement is being attached to the original of this motion on file in the Bankruptcy Court, the courtesy copy provided to the Court and the copy of the motion provided to the U.S. Trustee and counsel for the Creditors’ Committee. A copy of the Agreement is available from undersigned counsel upon request.

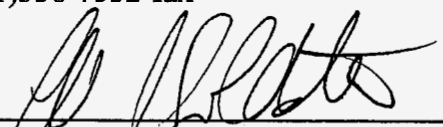
WHEREFORE, the Debtor moves that this Court enter an Order allowing the Debtor to sell its accounts receivable that are over 120 days old to HOV for the sum of \$66,331.43, grant the Debtor authority to sign all documentation necessary to effectuate the transfer of the accounts to HOV and for such other and further relief as this Court deems just and proper.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S. Mail

this 17<sup>th</sup> day of May, 2004 to all parties on the attached matrix.

I HEREBY CERTIFY that I am admitted to the Bar of the United States District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in this Court set forth in Local Rule 2090-1(A).

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