

ORIGINAL

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
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05 JUL -8 12 00 04

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.

COMMISSION
CLERK

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**DEBTORS' MOTION TO EXTEND EXCLUSIVITY PERIOD
TO SOLICIT ACCEPTANCES TO THE PLAN**

COME NOW, EPICUS COMMUNICATIONS GROUP, INC. and EPICUS, INC., the Debtors-in-Possession ("Debtors"), by and through undersigned counsel, and move the Court for the entry of an Order extending the exclusive period within which only the Debtors may solicit acceptances to their Plan, and in support thereof state as follows:

1. On October 25, 2004, the Debtors initiated separate voluntary petitions under Chapter 11

_____ of Title 11 of the United States Code in this Court.

2. The Debtors have been operating their affairs and managing their business as a Debtors-

_____ in-possession pursuant to the authority of 11 U.S.C. §§1107 and 1108.

3. Pursuant to § 1121 of the Bankruptcy Code, only the debtor may propose a plan within

_____ the first 120 days following the entry of the Order for Relief. The Court entered an Order on April

_____ 29, 2005, extending the exclusive period to file a Plan to May 23, 2005, and similarly extending the

1 exclusive period to solicit acceptance of a plan [CP#97].

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4. The Debtors filed their Joint Chapter 11 Plan of Reorganization on May 20, 2005 [CP#104].

5. Pursuant to 11 U.S.C. § 1121(d), the court, after notice and hearing, may increase the 180 day period within which only the debtor may solicit acceptances to the plan.

6. The Parties are still negotiating a consensual Plan and have sought to continue the hearing on consider approval of the Disclosure Statement. The parties do not believe the current exclusivity date of July 22, 2005 would be sufficient within which to complete the formulation of a consensual Plan and circulate the Plan and Disclosure Statement to all creditors and parties in interest. As a result, the Debtors request a ninety (90) day extension of the exclusive period for the Debtors to solicit acceptances of their Plan, through and including October 20, 2005.

7. The Debtors respectfully submit that the granting of this extension will not prejudice the rights of any creditor or any party in interest and submit that this motion is made in good faith and not for purposes of delay.

WHEREFORE, the Debtors respectfully request the entry of an Order extending the time within which only the Debtors may solicit acceptances of the Plan for a period of ninety (90) days, through and including October 20, 2005, as well as granting any other and further relief as this Court deems just and proper.


I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to all parties on the attached matrix this 5 day of July, 2005.

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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