

ORIGINAL

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION  
www.flsb.uscourts.gov

RECEIVED FPSC

AUG 15 AM 10:19

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 ENTER INTO AGREEMENTS WITH  
CUSTOM CALL DATA SYSTEMS, INC. TO OUT-SOURCE BILLING**

EPICUS, INC., the Debtor-in-Possession, by and through undersigned counsel, moves the Court for an Order authorizing the Debtor to enter into agreements with Custom Call Data Systems, Inc. ("Custom Call") to out-source billing, and would state as follows:

1. On October 25, 2004, the Debtor initiated this case by filing a Voluntary Petition under

CMP \_\_\_\_\_ Chapter 11 of Title 11 of the United States Code in this Court. The Debtor's parent company,  
COM \_\_\_\_\_  
CTR \_\_\_\_\_ Epicus Communications Group, Inc., filed a Voluntary Petition under Chapter 11 on October 25,  
ECR \_\_\_\_\_ 2004 under Case No. 04-34915-BKC-PGH. Pursuant to Court order, the cases are being jointly  
GCL \_\_\_\_\_ administered.

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

OTH Grant 3. Currently, all billing of the Debtor's customers is done in house and on-site. The Debtor estimates its monthly cost to bill its customers is \$58,905, broken down as follows:

DOCUMENT NUMBER - DATE

07888 AUG 15 08

Manpower	\$8,500
CABS	\$27,000
Supplies	\$5,500
Postage	\$14,000
Equipment	\$1,665
Bill Soft	\$2,200.

4. The Debtor would like to enter into agreement with Custom Call to out-source its billing.

The proposed agreements are attached to the original of the Motion on file with the Bankruptcy Court and the copies served on counsel for the U.S. Trustee's office, the Creditors' Committee, the AJW Group and BellSouth, and are available from undersigned counsel upon request.

5. The Debtor estimates that out-sourcing its billing to Custom Call will result in a monthly savings of \$17,830, broken down as follows:

Cost per account	\$19,000
CABS	\$5,600
Print images	\$4,800
Postage	\$8,250
.pdf	\$300
Comp/Fee	\$3,000
Total	\$41,075

6. In addition, the Debtor currently bills utilizing software developed by a former employee, which has no "back-up". In the event the Debtor's computer system malfunctions, all billing information may be lost.

7. As a result of the foregoing, the Debtor believes it is in the best interests of the estate and its creditors to approve the agreements with Custom Call.

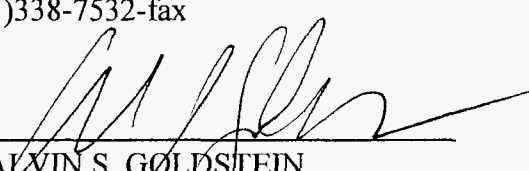
WHEREFORE, the Debtor moves that this Court enter an Order allowing the Debtor to enter into agreements with Custom Call pursuant to the terms of the Agreements, and for such other and further relief as this Court deems just and proper.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S. Mail this 10<sup>th</sup> day of August, 2005 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).

FURR AND COHEN, P.A.  
Attorney for Debtor  
2255 Glades Road  
One Boca Place, Suite 337W  
Boca Raton, FL 33431  
(561) 395-0500  
(561)338-7532-fax

By

  
ALVIN S. GOLDSTEIN  
Florida Bar No. 993621  
EMAIL [agoldstein@furrcohen.com](mailto:agoldstein@furrcohen.com)

H:\LIBRARY\BANKRUPTCY\Epicus Communications Group\PLD\M2 Enter into Agreements with Custom Call.wpd