

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

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IN RE:	§	
UPH HOLDINGS, INC.	§	CASE NO. 13-10570
PAC-WEST TELECOMM, INC.	§	CASE NO. 13-10571
TEX-LINK COMMUNICATIONS, INC.	§	CASE NO. 13-10572
UNIPOINT HOLDINGS, INC.	§	CASE NO. 13-10573
UNIPOINT ENHANCED SERVICES, INC.	§	CASE NO. 13-10574
UNIPOINT SERVICES, INC.	§	CASE NO. 13-10575
NWIRE, LLC	§	CASE NO. 13-10576
PEERING PARTNERS COMMUNICATIONS, LLC	§	CASE NO. 13-10577

DEBTORS. § CHAPTER 11

EIN: 45-1144038; 68-0383568; 74-2729541; 20-3399903; 74-3023729; 38-3659257; 37-1441383; 27-2200110; 27-4254637

6500 RIVER PL. BLVD., BLDG. 2, # 200 § JOINTLY ADMINISTERED UNDER  
AUSTIN, TEXAS 78730 § CASE NO. 13-10570

JOINT MOTION FOR EXPEDITED HEARING

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW UPH Holdings, Inc., ("UPH"), Pac-West Telecom, Inc., ("Pac-West"), Tex-Link Communications, Inc. ("Tex-Link"), UniPoint Holdings, Inc. ("UniPoint Holdings"), UniPoint Enhanced Services, Inc. ("UniPoint Enhanced"), UniPoint Services, Inc., ("UniPoint"), nWire, LLC ("nWire"), and Peering Partners Communications, LLC ("Peering Partners") (collectively the "Debtors"), by and through their proposed, undersigned counsel, and the

Official Committee of Unsecured Creditors ("Committee"), by and through its proposed, undersigned counsel, file this Joint Motion for Expedited Hearing on the Debtors' Motion for Entry of an Order Establishing Procedures for Filing Proofs of Claim, Deadline for § 503(b)(9)

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Claim, and Procedures for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof (“Motion for Claim Procedures”), and in support, would show the Court as follows:

1. On March 28, 2013, the Debtors filed their voluntary Chapter 11 petitions (the “Petition Date”) in the above-styled and numbered bankruptcy cases (the “Bankruptcy Cases”). On April 2, 2013, the Court entered an order authorizing joint administration of the reorganization cases. The Debtors continue in possession of their property and management of their business as debtors-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108.

2. On May 2, 2013 the Debtors filed their Motion for Claim Procedures [Dckt. No. 141].

3. An expedited hearing is necessary on the Motion for Claim Procedures because to otherwise delay will allow for further proofs of claim to be filed outside of the procedures proposed by the Debtors in the Motion for Claim Procedures, thus undermining the Debtors’ goal to streamline the administration of these Chapter 11 cases. An expeditious hearing on the Motion for Claim Procedures will thus serve to promote the efficient and administration of the Debtors’ estates, and in turn, support the Debtors’ reorganization.

4. To date, claims have already been filed in each of the Debtors’ bankruptcy cases. If the Motion for Claim Procedures is heard in the ordinary course, instead of on an expedited basis as requested herein, claims will continue to be filed outside of the procedures proposed in the Motion for Claim Procedures. In addition, prudence countenances that as the claims bar date of July 22, 2013 nears, additional or higher numbers of claims may be filed to meet the bar date deadline. Expedited consideration of the Motion for Claim Procedures is accordingly necessary so that if the procedures requested by the Debtors in the Motion for Claim Procedures are approved, the Debtors will be able to implement the subject procedures as early in the case as possible, and also, will be able to have the subject procedures in place for a longer period of time.

5. Additionally, the Debtors and the Committee herein are requesting that the Motion for Proof of Claim Procedures be set for the next available omnibus hearing date of May 9, 2013, along with other matters already set for hearing in these cases.

6. Accordingly, the Debtors and the Committee thus respectfully request a hearing date of May 9, 2013 at 1:30 p.m. on the Motion for Proof of Claim Procedures.

WHEREFORE, PREMISES CONSIDERED the Debtors and the Committee respectfully request that the Court set a hearing on the above motion for May 9, 2013 at 1:30 p.m., and that the Court grant such other and further relief as is just and equitable.

Dated: May 3, 2013.

Respectfully submitted,

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Dated: New York, New York  
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**PROPOSED COUNSEL TO THE  
OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF UPH  
HOLDINGS, INC., ET AL.**

**CERTIFICATE OF CONFERENCE**

I hereby certify that on the 3rd day of May 2013, I conferred with counsel for the Office of the United States Trustee, Valerie L. Wenger, and she stated that she had no objection to the request for expedited consideration of the Debtors' Motion for Entry of an Order Establishing Procedures for Filing Proofs of Claim, Deadline for § 503(b)(9) Claim, and Procedures for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof (as herein defined "Motion for Claim Procedures").

/s/ Jennifer F. Wertz  
Jennifer F. Wertz

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of May 2013, a true and correct copy of the foregoing Order was served via the Court's CM/ECF electronic notification system on all parties requesting same, and via US first class mail, post prepaid to the parties listed on the attached service list.

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/s/ Jennifer F. Wertz  
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