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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

TERRESTAR CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 11-10612 (SHL)

(Jointly Administered)

**PRELIMINARY OBJECTION OF ELEKTROBIT INC. TO
CONFIRMATION OF THE JOINT CHAPTER 11 PLAN OF TERRESTAR
CORPORATION, MOTIENT COMMUNICATIONS INC., MOTIENT
HOLDINGS INC., MOTIENT LICENSE INC., MOTIENT SERVICES
INC., MOTIENT VENTURES HOLDING INC., MVH HOLDINGS INC.
TERRESTAR HOLDINGS INC. AND TERRESTAR NEW YORK INC.**

Elektrobit Inc. (“Elektrobit”), by and through its undersigned counsel, hereby objects to confirmation of the Joint Chapter 11 Plan of TerreStar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc. TerreStar Holdings Inc. and TerreStar New York Inc. (the “Plan”) (Docket No. 141), which Elektrobit reserves the right to supplement prior to any deadline that may be established by the Court for filing and service of objections to the Plan, or by any other Court-ordered or mutually agreed deadline (the “Plan Objection Deadline”). In

support hereof, Elektrobit states as follows:¹

1. As the Court is aware, Elektrobit is one of the largest unsecured creditors of TerreStar Corporation (“TSC”, and together with its affiliated debtors and debtors-in-possession (collectively, the “TSC Debtors”), having asserted a general unsecured claim against TSC’s estate in the amount of \$27,869,769.82 (at least).²

2. On September 2, 2011, Elektrobit filed an objection to the TSC Debtors’ motion for an order (A) approving the Disclosure Statement and (B) establishing solicitation and voting procedures with respect to the Plan (the “Disclosure Statement Objection”) (Docket No. 186).

3. The TSC Debtors’ motion to approve the Disclosure Statement, and related objections, are presently pending before the Court and have been scheduled for hearing on October 12, 2011. The TSC Debtors’ proposed procedures contemplate that a hearing on confirmation of the Plan will be scheduled for November 9, 2011 (the “Confirmation Hearing”), with a Plan Objection Deadline of October 28, 2011.

4. Elektrobit files this Preliminary Objection to remove any doubt that the confirmation of the Plan is a contested matter and that discovery is appropriate under Federal Rule of Bankruptcy Procedure 9014. Elektrobit intends to file a supplement to this Preliminary Objection on or prior to the Plan Objection Deadline.

5. While the information included in the Disclosure Statement and the Plan is limited and inconsistent in material respects, Elektrobit has expressed concern that the Plan may

¹ Capitalized terms not otherwise defined herein shall have the meanings stated in the TSC Debtors’ Disclosure Statement (the “Disclosure Statement”) (Docket No. 149) or in the Plan, as applicable.

² Elektrobit’s claim has been placed in Class 4a of the Plan for voting purposes only. *Stipulation and Agreed Order Temporarily Allowing and Valuing Elektrobit Inc.’s Claim No. 58 For Voting Purposes Only* (Docket No. 193). Elektrobit filed a claim in the case of TerreStar Networks, Inc. in the same amount, but seeks only a single recovery from these debtors.

represent an attempt by certain “Preferred Stockholders” to use the bankruptcy process to effectuate their strategic objectives without first paying creditors in full. At stake is control of TSC’s principal asset, the 1.4 GHz spectrum indirectly controlled by TSC through its wholly-owned subsidiary, non-debtor TerreStar 1.4 Holdings LLC. *Disclosure Statement Objection at 2.*

6. Elektrobit has also noted that the Disclosure Statement describes a Plan that appears to be unconfirmable in its current form. *See id. at 16.* Thus, Elektrobit objects and (among other things) may argue any of the following at the Confirmation Hearing: that the Plan may not satisfy the “best interest of creditors” test embodied in Bankruptcy Code § 1129(a)(7); may not provide the same treatment for each claim in Class 4a, contrary to Code §§ 1123(a)(4) and 1129(a)(1); and may not be feasible, contrary to Code § 1129(a)(11). Moreover, Elektrobit respectfully submits that the Court may find that the Plan discriminates unfairly, is not fair and equitable, and does not satisfy the absolute priority rule, contrary to Code § 1129(b).³

7. In identifying particular issues relating to the Plan at this time, Elektrobit reserves the right to raise by the Plan Objection Deadline, and at the Confirmation Hearing, these and any other issues or objections to confirmation of the Plan based upon § 1129 of the Bankruptcy Code and other statutory provisions applicable to confirmation.

³ In the Disclosure Statement Objection, Elektrobit recognized that many of the issues it has raised constitute objections to the Plan as well as objections to the Disclosure Statement, and reserved all rights in connection with such objections for the Confirmation Hearing. *Disclosure Statement Objection at 3 n.5.*

CONCLUSION

WHEREFORE, Elektrobit respectfully requests that the Court to enter an Order denying confirmation of the Plan, and grant Elektrobit such other and further relief as is just and proper.

Dated: September 30, 2011

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CERTIFICATE OF SERVICE

The undersigned certifies that as of this date s/he caused a true and correct copy of the foregoing **Preliminary Objection of Elektrobit Inc. to Confirmation of the Joint Chapter 11 Plan of Terrestar Corporation, Motient Communications Inc., Motient Holdings Inc., Motient License Inc., Motient Services Inc., Motient Ventures Holding Inc., MVH Holdings Inc. Terrestar Holdings Inc. and Terrestar New York Inc.** to be filed electronically via the ECF system and served, postage prepaid, by first class mail, or overnight mail if so indicated, on all members of the attached Service List.

/s/ Pamela Smith Holleman

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