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*Counsel to the TSC Debtors*

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

\_\_\_\_\_  
In re: )

) Chapter 11

TERRESTAR CORPORATION, *et al.*,<sup>1</sup> )

) Case No. 11-10612 (SHL)

) Debtors. )

) Jointly Administered  
)

**MOTION FOR ADMISSION TO PRACTICE *PRO HAC VICE***

I, Joanna F. Newdeck, request admission, *pro hac vice*, before the Honorable Sean H. Lane, to represent TerreStar Corporation and certain of its affiliates, as debtors and debtors in possession, in the above referenced cases.

I certify that I am a member in good standing of the bars in the State of New Jersey and the District of Columbia. I am admitted to practice before the U.S. Bankruptcy Court and the U.S. District Court for the District of New Jersey.

\_\_\_\_\_  
<sup>1</sup> The debtors in these chapter 11 cases, along with the last four digits of each debtor’s federal taxpayer-identification number, are: (a) TerreStar Corporation [6127] and TerreStar Holdings Inc. [0778] (collectively, the “*February Debtors*”); and (b) TerreStar New York Inc. [6394]; Motient Communications Inc. [3833]; Motient Holdings Inc. [6634]; Motient License Inc. [2431]; Motient Services Inc. [5106]; Motient Ventures Holding Inc. [6191]; and MVH Holdings Inc. [9756] (collectively, the “*Other TSC Debtors*” and, collectively with the February Debtors, the “*TSC Debtors*”).

I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Washington, D.C.

Dated: December 20, 2011

*/s/ Joanna F. Newdeck*

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**EXHIBIT A**

**Proposed Order**

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

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In re:	)	Chapter 11
	)	
TERRESTAR CORPORATION, <i>et al.</i> , <sup>1</sup>	)	Case No. 11-10612 (SHL)
	)	
Debtors.	)	Jointly Administered

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**ORDER GRANTING ADMISSION TO PRACTICE *PRO HAC VICE***

Upon the motion of Joanna F. Newdeck, to be admitted, *pro hac vice*, to represent to represent TerreStar Corporation and certain of its affiliates, as debtors and debtors in possession, in the above referenced case, and upon the movant's certification that the movant is a member in good standing of the bar in the State of New Jersey and the District of Columbia and is admitted to practice before the U.S. Bankruptcy Court and the U.S. District Court for the District of New Jersey, it is hereby

**ORDERED**, that Joanna F. Newdeck is admitted to practice, *pro hac vice*, in the above referenced case to represent the TSC Debtors in the United States Bankruptcy Court for the Southern District of New York, provided that the filing fee has been paid.

New York, New York  
Date: \_\_\_\_\_, 2011

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THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE

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<sup>1</sup> The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal taxpayer-identification number, are: (a) TerreStar Corporation [6127] and TerreStar Holdings Inc. [0778] (collectively, the "**February Debtors**"); and (b) TerreStar New York Inc. [6394]; Motient Communications Inc. [3833]; Motient Holdings Inc. [6634]; Motient License Inc. [2431]; Motient Services Inc. [5106]; Motient Ventures Holding Inc. [6191]; and MVH Holdings Inc. [9756] (collectively, the "**Other TSC Debtors**" and, collectively with the February Debtors, the "**TSC Debtors**").