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Ira S. Dizengoff
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*Counsel to the Other TSC Debtors and
Proposed Counsel to the February Debtors*

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

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

MOTION FOR ADMISSION OF SARAH LINK SCHULTZ PRO HAC VICE

I, Sarah Link Schultz, a member in good standing of the bar of the State of Texas and admitted to practice before the United States District Court for the Southern District of Texas, the United States District Court for the Eastern District of Texas, the United States District Court for the Northern District of Texas, the United States District Court for the Western District of Texas, and the Texas Supreme Court, request admission, *pro hac vice*, before the Honorable Sean H. Lane, to represent TerreStar Corporation, and its affiliated debtors and debtors in possession in the above-referenced chapter 11 cases.

¹ 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*").

My address is 1700 Pacific Avenue, Suite 4100, Dallas, Texas 75201; my e-mail address is sschultz@akingump.com; and my telephone number is (214) 969-4367.

I agree to pay the fee of \$25 upon entry of an order by this Court, substantially in the form attached hereto as Exhibit A, admitting me to practice *pro hac vice*.

New York, New York
Dated: February 16, 2011

/s/ Sarah Link Schultz

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EXHIBIT A
PROPOSED ORDER

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and Debtors in Possession*

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

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In re:)	Chapter 11
TERRESTAR CORPORATION, <i>et al.</i> , ¹)	Case No. 11-10612 (SHL)
Debtors.)	Joint Administration Requested
_____)	

ORDER OF ADMISSION TO PRACTICE *PRO HAC VICE*

ORDERED,

that Sarah Link Schultz is admitted to practice, *pro hac vice*, in the above-referenced case, in the United States Bankruptcy Court, Southern District of New York, subject to payment of the filing fee.

Dated: _____, 2011
New York, New York

UNITED STATES BANKRUPTCY JUDGE

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