## KLETT LIEBER ROONEY & SCHORLING

A PROFESSIONAL CORPORATION

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40TH FLOOR, ONE OXFORD CENTRE, PITTSBURGH, PENNSYLVANIA 15219-6498

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS (EASTERN DIVISION)

Case No. 99 B 33272

TELEHUB NETWORK SERVICES

CORPORATION

IN RE:

Chapter 11

Honorable Carol A. Doyle

Hearing Date: January 25, 2000

Hearing Time: 2:00 p.m.

Debtor.

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## **NOTICE OF MOTION**

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PLEASE TAKE NOTICE that on the 25th day of January, 2000, at 2:00 p.m., or as soon thereafter as this motion may be heard, we shall appear before the Honorable Judge Carol A. Doyle or any judge sitting in her stead, in the courtroom usually occupied by her in Room 613 in the Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois and then and there present MCI WORLDCOM Network Services, Inc.'s ("WorldCom") Motion for an Order Pursuant to Section 1112(b) of Title 11 of the United States Code ("Bankruptcy Code") to Convert the Chapter 11 Proceeding of TeleHub Network Services Corporation to a Proceeding under Chapter 7 of the Bankruptcy Code ("Motion"). Copies of the Motion are available upon request directed to WorldCom's Counsel set forth below.

Robert P. Simons, Esquire

Robert A. Griffiths, Esquire

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Dated: December 23, 1999

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Local Counsel for MCI WORLDCOM

Network Services, Inc.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

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