

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)
IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C 36, AS AMENDED**

**APPLICATION OF LIGHTSQUARED LP
UNDER SECTION 46 OF THE *COMPANIES' CREDITORS ARRANGEMENT*
ACT, R.S.C. 1985, c. C 36, AS AMENDED**

**AND IN THE MATTER OF CERTAIN PROCEEDINGS TAKEN IN THE
UNITED STATES BANKRUPTCY COURT WITH RESPECT TO
LIGHTSQUARED INC., LIGHTSQUARED INVESTORS HOLDINGS INC., ONE
DOT FOUR CORP., ONE DOT SIX CORP., SKYTERRA ROLLUP LLC,
SKYTERRA ROLLUP SUB LLC, SKYTERRA INVESTORS LLC, TMI
COMMUNICATIONS DELAWARE, LIMITED PARTNERSHIP,
LIGHTSQUARED GP INC., LIGHTSQUARED LP, ATC TECHNOLOGIES,
LLC, LIGHTSQUARED CORP., LIGHTSQUARED FINANCE CO.,
LIGHTSQUARED NETWORK LLC, LIGHTSQUARED INC. OF VIRGINIA,
LIGHTSQUARED SUBSIDIARY LLC, LIGHTSQUARED BERMUDA LTD.,
SKYTERRA HOLDINGS (CANADA) INC., SKYTERRA (CANADA) INC. AND
ONE DOT SIX TVCC CORP. (COLLECTIVELY, THE "CHAPTER 11
DEBTORS")**

**MOTION RECORD
(Returnable October 17, 2013)**

October 11, 2013

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TAB 1

**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

**IN THE MATTER OF THE *COMPANIES' CREDITORS ARRANGEMENT ACT*,
R.S.C. 1985, c. C 36, AS AMENDED**

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LIGHTSQUARED INC., LIGHTSQUARED INVESTORS HOLDINGS INC., ONE
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SKYTERRA HOLDINGS (CANADA) INC., SKYTERRA (CANADA) INC. AND
ONE DOT SIX TVCC CORP. (COLLECTIVELY, THE "CHAPTER 11
DEBTORS")**

**NOTICE OF MOTION
(Returnable on October 17, 2013)**

LightSquared LP, on its own behalf and in its capacity as foreign representative of the Chapter 11 Debtors ("**LightSquared**" or the "**Foreign Representative**"), will make a motion to the Court on October 17, 2013 at 8:30 a.m. or as soon after that time as the motion can be heard at 330 University Avenue, Toronto, Ontario.

PROPOSED METHOD OF HEARING: The motion is to be heard orally.

THE MOTION IS FOR:

1. An order substantially in the form of the draft order attached hereto as Schedule “A”, *inter alia*:
 - (a) Abridging the time for service and validating service of this Notice of Motion and Motion Record, such that this motion is properly returnable on October 17, 2013;
 - (b) Recognizing in Canada and giving full force and effect in all provinces and territories of Canada, pursuant to section 49 of the *Companies’ Creditors Arrangement Act*, R.S.C. 1985 c. C. 36, as amended (the “**CCAA**”), the following order (“**Foreign Order**”) of the United States Bankruptcy Court for the Southern District of New York (the “**U.S. Bankruptcy Court**”) made in the cases commenced by the Chapter 11 Debtors in the U.S. Bankruptcy Court under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “**Chapter 11 Cases**”):
 - (i) Order (I) Approving Disclosure Statements, (II) Approving Solicitation and Notice Procedures with Respect to Confirmation of Competing Plans, (III) Approving Forms of Various Ballots and Notices in Connections Therewith, (IV) Approving Scheduling of Certain Dates in Connection with Confirmation of Competing Plans, and (V) Granting Related Relief; and
 - (c) Approving the tenth report (the “**Tenth Report**”) of Alvarez & Marsal Canada Inc. (“**A&M Canada**”), in its capacity as court-appointed information officer of the Chapter 11 Debtors in respect of this proceeding (the “**Information Officer**”), and the activities of the Information Officer as set out therein.

2. Such further and other relief as counsel may request and this Honourable Court may deem just.

THE GROUNDS FOR THE MOTION ARE:

Background

1. On May 14, 2012, the Chapter 11 Debtors commenced the Chapter 11 Cases by each filing a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the U.S. Bankruptcy Court;
2. Other than the Chapter 11 Cases and these proceedings, there are no other foreign proceedings in respect of the Chapter 11 Debtors;
3. On May 15, 2012, the Honourable Justice Morawetz of the Ontario Superior Court of Justice (Commercial List) (the “**Canadian Court**”) granted an order providing certain interim relief to the Chapter 11 Debtors, including a stay of proceedings in respect of the Chapter 11 Debtors, the property and business of the Chapter 11 Debtors and the directors and officers of the Chapter 11 Debtors;
4. On May 15, 2012 and May 16, 2012, the U.S. Bankruptcy Court in the Chapter 11 Cases entered various “first day” orders, including an interim order authorizing LightSquared to act as the Foreign Representative of the Chapter 11 Debtors;
5. On May 18, 2012, the Honourable Justice Morawetz granted an Initial Recognition Order in these proceedings, which among other things: (i) recognized LightSquared as the “foreign representative” of the Chapter 11 Debtors; (ii) declared the Chapter 11 Cases to be a “foreign main proceeding” pursuant to Part IV of the CCAA; and (iii) stayed all proceedings against the Chapter 11 Debtors;
6. On May 18, 2012, the Honourable Justice Morawetz also granted a Supplemental Order in these proceedings, which among other things: (i) recognized and enforced in Canada certain orders of the U.S. Bankruptcy Court in the Chapter 11 Cases; (ii) appointed A&M Canada as Information Officer in these proceedings;

(iii) stayed all claims and proceedings in respect of the Chapter 11 Debtors, the property and business of the Chapter 11 Debtors and the directors and officers of the Chapter 11 Debtors; and (iv) granted a super-priority charge over the Chapter 11 Debtors' property, in favour of the Information Officer and its counsel, as security for their professional fees and disbursements incurred in respect of these proceedings;

7. On June 14, 2012, August 21, 2012, March 8, 2013, March 20, 2013, August 13, 2013 and October 9, 2013 the Canadian Court granted orders in these proceedings recognizing and enforcing in Canada certain additional orders of the U.S. Bankruptcy Court made in the Chapter 11 Cases;
8. Among other things, the October 9, 2013 recognition order recognized the "Order (A) Establishing Bid Procedures, (B) Scheduling Date and Time for Auction, (C) Approving Assumption and Assignment Procedures, (D) Approving Form of Notice, and (E) Granting Related Relief";

Foreign Order

9. The chapter 11 plan process in the Chapter 11 Cases requires disclosure statements to be filed with the U.S. Bankruptcy Court;
10. The Chapter 11 Debtors filed the General Disclosure Statement with the U.S. Bankruptcy Court on August 29, 2013;
11. In late August, each of the plan proponents, being the Chapter 11 Debtors, Harbinger Capital Partners, LLC, the ad hoc secured group of LightSquared LP Lenders, exclusive of SP Special Opportunities, LLC (the "**Ad Hoc Secured Group**") and U.S. Bank National Association together with MAST Capital Management, LLC (on behalf of itself and its management funds and accounts), also filed individual Specific Disclosure Statements and brought corresponding motions seeking approval from the U.S. Bankruptcy Court of the adequacy of their Specific Disclosure Statements (the "**Disclosure Statement Motions**");

12. The hearing of the Disclosure Statement Motions was originally scheduled for September 30, 2013, but was subsequently adjourned to October 9, 2013 by the U.S. Bankruptcy Court;
13. Returnable at the same time as the Disclosure Statement Motions was the hearing of the motions to approve the (i) solicitation and notice procedures with respect to confirmation of the competing chapter 11 plans, (ii) forms of ballots and notices in connection therewith, and (iii) scheduling of certain dates in connection with confirmation of the competing chapter 11 plans (the “**Solicitation Procedures Motions**”);
14. Both the Chapter 11 Debtors and the Ad Hoc Secured Group filed motions for approval of solicitation procedures and related relief. However, at the return of the motion, the Ad Hoc Secured Group did not proceed with their request for this relief and accordingly no competing solicitation procedures were before the U.S. Bankruptcy Court at the October 9, 2013 hearing;
15. On October 9, 2013, the U.S. Bankruptcy Court heard the Disclosure Statement Motions and the Solicitation Procedures Motions, and having determined the cumulative relief sought therein to be appropriate on October 10, 2013 entered the Foreign Order;
16. The Foreign Representative is of the view that the recognition of the Foreign Order by the Canadian Court is necessary for the protection of the Chapter 11 Debtors’ property and the interest of their creditors;
17. Accordingly, the Foreign Representative requests that this Honourable Court recognize in Canada and enforce the Foreign Order, pursuant to Section 49 of the CCAA;

General

18. The facts as further set out in the Tenth Report and the affidavit of Elizabeth Creary sworn October 10, 2013 (the “**Creary Affidavit**”);

19. The provisions of the CCAA, including Part IV;
20. The *Rules of Civil Procedure*, including rules 2.03, 3.02 and 16; and
21. Such further and other grounds as counsel may advise and this Court may permit.

**THE FOLLOWING DOCUMENTARY EVIDENCE WILL BE USED AT
THE HEARING OF THE MOTION:**

1. The Creary Affidavit and the exhibits referred to therein, including the Foreign Orders;
2. The Information Officer's Tenth Report (to be filed separately); and
3. Such further and other material as counsel may advise and this Honourable Court may permit.

October 11, 2013

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TO: THE SERVICE LIST

SCHEDULE A

ONTARIO
SUPERIOR COURT OF JUSTICE
COMMERCIAL LIST

THE HONOURABLE •)	THURSDAY, THE 17 TH
JUSTICE •)	DAY OF OCTOBER, 2013
)	

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RECOGNITION ORDER

THIS MOTION, made by LightSquared LP in its capacity as the foreign representative (the "Foreign Representative") of the Chapter 11 Debtors, pursuant to the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "CCAA"), for an order substantially in the form attached as Schedule "A" to the notice of motion of the Foreign Representative dated October 11, 2013 (the "Notice of

Motion”), recognizing an order granted by the United States Bankruptcy Court for the Southern District of New York (the “**U.S. Bankruptcy Court**”) in the cases commenced by the Chapter 11 Debtors under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “**Chapter 11 Cases**”), was heard this day at 330 University Avenue, Toronto, Ontario.

ON READING the Notice of Motion, the affidavit of Elizabeth Creary sworn October 10, 2013, the tenth report of Alvarez & Marsal Canada Inc., in its capacity as court-appointed information officer of the Chapter 11 Debtors (the “**Information Officer**”), dated October •, 2013 (the “**Tenth Report**”), and on hearing the submissions of counsel for the Foreign Representative, counsel for the Information Officer, counsel for the ad hoc secured group of LightSquared LP Lenders and counsel to L-Band Acquisition, LLC, no one else appearing although duly served as appears from the affidavit of service of • sworn October •, 2013, filed,

SERVICE

1. **THIS COURT ORDERS** that the time for service of the Notice of Motion and the Motion Record is hereby abridged and validated so that this Motion is properly returnable today and hereby dispenses with further service thereof.

RECOGNITION OF FOREIGN ORDER

2. **THIS COURT ORDERS** that the following order (the “**Foreign Order**”) of the U.S. Bankruptcy Court made in the Chapter 11 Cases is hereby recognized and given full force and effect in all provinces and territories of Canada pursuant to Section 49 of the CCAA:

- (a) Order (I) Approving Disclosure Statements, (II) Approving Solicitation and Notice Procedures with Respect to Confirmation of Competing Plans, (III) Approving Forms of Various Ballots and Notices in Connections Therewith, (IV) Approving Scheduling of Certain Dates in Connection with Confirmation of Competing Plans, and (V) Granting Related Relief;

attached hereto as Schedule "A", provided, however, that in the event of any conflict between the terms of the Foreign Order and the Orders of this Court made in the within proceedings, the Orders of this Court shall govern with respect to the Chapter 11 Debtors' current and future assets, undertakings and properties of every nature and kind whatsoever in Canada.

3. **THIS COURT ORDERS** that the Tenth Report and the activities of the Information Officer as described therein be and are hereby approved.

SCHEDULE “A”

IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C. 1985, c. C 36, AS AMENDED,
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STATES BANKRUPTCY COURT WITH RESPECT TO THE CHAPTER 11 DEBTORS

ONTARIO
SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT
TORONTO

RECOGNITION ORDER
(OCTOBER 17, 2013)

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ONTARIO

SUPERIOR COURT OF JUSTICE

PROCEEDING COMMENCED AT TORONTO

NOTICE OF MOTION

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MOTION RECORD
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