

their Motion to Dismiss Amended Complaint and also on the Motion to Dismiss Amended Complaint filed by John P. Pucci and Fierst, Pucci & Kane, LLP (collectively "Motions to Dismiss"). In support of this request, 3ABN and Shelton respectfully represent as follows:

1. On February 21, 2008, 3ABN and Shelton filed their Motion to Dismiss Amended Complaint. On or about February 22, 2008, John P. Pucci and Fierst, Pucci & Kane, LLP filed a Motion to Dismiss Amended Complaint. Subsequently, the Court set hearings on the Motions to Dismiss for April 3, 2008, at 11:30 a.m. (hereinafter "Hearings").

2. Pursuant to an Order of this Court dated March 3, 2008 authorizing 3ABN and Shelton to conduct a Rule 2004 Examination of the Plaintiff (who is also the Debtor in the underlying Chapter 7 case), 3ABN and Shelton have issued a Subpoena for the production of documents and other information and to conduct a Rule 2004 Examination. That Examination is currently scheduled to take place on April 15, 2008. 3ABN and Shelton believe that it would be helpful for the Rule 2004 Examination to take place prior to the hearings on the Motions to Dismiss.

3. Furthermore, Attorney John Pucci, on behalf of himself and his law firm, Fierst, Pucci & Kane, LLP has indicated to the undersigned that he will not be available for the April 3, 2008 Hearings due to long-standing conflicting travel plans.

4. Therefore, 3ABN and Shelton respectfully request that the Hearings be rescheduled to a date that would enable Attorney Pucci to attend and to allow for the April 15, 2008 Rule 2004 Examination to take place prior to the hearings on the Motions

to Dismiss. Parties are available during or after the week of April 28, 2008. Attorney John Pucci has reviewed this Motion and has indicated to the undersigned that he approves of it.

WHEREFORE, 3ABN and Shelton respectfully request that the Hearing be rescheduled to the week of April 28, 2008, or to another date that would be convenient to the Court.

THREE ANGELS BROADCASTING
NETWORK, INC.
DANNY LEE SHELTON

Dated: March 13, 2008

By: /s/ George I. Roumeliotis
JOSEPH B. COLLINS, ESQ.
(BBO No. 092660)
GEORGE I. ROUMELIOTIS, ESQ.
(BBO No. 564943)
HENDEL & COLLINS, P.C.
101 State Street
Springfield, MA 01103
Tel. (413) 734-6411
groumeliotis@hendelcollins.com

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Notice of electronic service of said Motion, a copy thereof will be served by first class mail, post prepaid, to any of the parties listed on the attached Exhibit "A" not noted as having received electronic service, said service being made on the 13th day of March, 2008.

/s/ George I. Roumeliotis
GEORGE I. ROUMELIOTIS, ESQ.
(BBO No. 564943)
HENDEL & COLLINS, P.C.
101 State Street
Springfield, MA 01103
Tel. (413) 734-6411
groumeliotis@hendelcollins.com

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EXHIBIT "A"

Richard T. King, Esq.
OFFICE OF THE U.S. TRUSTEE
446 Main Street, 14th Floor
Worcester, MA 01608

Janice G. Marsh, Trustee
THE MARSH LAW FIRM, PC
446 Main Street
Worcester, MA 01608

LAIRD J. HEAL, ESQ.
78 Worcester Road
P.O. Box 365
Sterling, MA 01564

LAIRD J. HEAL, ESQ.
3 Clinton Road
P.O. Box 365
Sterling, MA 01564-0365

MR. GAILON ARTHUR JOY
P.O. Box 1425
Sterling, MA 01564

Gerald S. Duffy, Esq.
Jerrie M. Hayes, Esq.
SIEGEL, BRILL, GREUPNER,
DUFFY & FOSTER, P.A.
100 Washington Avenue South
Suite 1300
Minneapolis, MN 55401

John P. Pucci, Esq.
FIERST, PUCCI & KANE, LLP
64 Gothic Street, Suite 4
Northampton, MA 01060