UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In Re:

UNITEK GLOBAL SERVICES, INC., A Delaware Corporation, *et al.*¹

Chapter 11

Case No.: 14-12471-PJW (Jointly Administered)

Debtor

Hearing Date: Objection Deadline:

NOTICE OF MOTION FOR RELIEF FROM STAY

Creditor Brian S. Thomas, Bankruptcy Trustee for the matter of In re Michael P. Sullivan and Kristen A. Sullivan, Case No.: 12-25363 (GMB) in the United States Bankruptcy Court for the District of New Jersey ("Thomas"), by his attorneys, Subranni Zauber LLC, filed a Motion for Relief from Stay in the above captioned bankruptcy proceeding P. 9019 (the "Motion"). The Motion seeks the following relief: that the automatic stay be lifted so that Michael P. Sullivan and Kristen A. Sullivan can proceed with a personal injury action previously filed in the Superior Court of New Jersey, Law Division, Gloucester County, Docket Number GLO-L-001538-13.

If you seek to object or otherwise respond to the Motion, you must file an objection/ response to the Motion in writing on or before ______ at _____ Eastern Standard Time, with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, DE 19801. At the same time, you must also serve a copy of the response/objection upon the Trustee's attorneys:

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal taxpayeridentification number, are: UniTek Global Services, Inc. (3445), UniTek Holdings, Inc. (4120), UniTek Midco, Inc. (5642), UniTek Acquisition, Inc. (4123), Nex-link USA Communications, Inc. (9084), UniTek USA, LLC (0279), Pinnacle Wireless USA, Inc. (1746), DirectSAT USA, LLC (3465), FTS USA, LLC (6247), Advanced Communications USA, Inc. (0091). For the avoidance of doubt, Wirecomm Systems (2008) Inc. (FKA UniTek Canada), an affiliate of the Debtors and wholly owned subsidiary of UniTek USA, LLC is not a Debtor in the chapter 11 cases. The Debtors' main corporate address is 1777 Sentry Parkway West, Gwynedd Hall, Suite 302, Blue Bell, Pennsylvania 19422.

Randal Cowles	AND	William P. Rubley
Subranni Zauber LLC		Subranni Zauber LLC
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4 East Eighth Street – Suite 400		750 Route 73 South, Suite 307B
Wilmington, DE 19801		Marlton NJ 08053

If a copy of the Motion is not enclosed with this Notice, you may obtain it by sending a written

request to the Trustee's attorneys at the address listed above.

A HEARING IS SCHEDULED FOR ______AT ____. IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: December 16, 2014

/s/ Randal Cowles

Randal Cowles, Esq. Delaware Bar I.D. No. 4373 **SUBRANNI ZAUBER LLC** Towne Center Building 4 East Eighth Street – Suite 400 Wilmington, DE 19801 (609) 347-7000; Fax (609) 345-4545 Counsel to Creditor Brian S. Thomas

-And-

/s/ William P. Rubley

William P. Rubley, Esq. SUBRANNI ZAUBER LLC Willow Ridge Executive Office Park 750 Route 73 South, Suite 307B Marlton, NJ 08053 (609) 347-7000; Fax (609) 345-4545 Counsel to Creditor Brian S. Thomas