

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

DBSI, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 08-12687 (PJW)

Jointly Administered

Ref. Docket No. 31

Hearing Date: December 2, 2008 at 2:00 p.m. (ET)

Objection Deadline: November 26, 2008 at 4:00 p.m. (ET)

NOTICE OF MOTION

TO: (I) THE U.S. TRUSTEE; (II) THE DEBTORS' FIFTY (50) LARGEST UNSECURED CREDITORS; AND (III) THOSE PARTIES ENTITLED TO NOTICE PURSUANT TO BANKRUPTCY RULE 2002, IN ACCORDANCE WITH LOCAL RULE 2002-1(b).

PLEASE TAKE NOTICE that on November 12, 2008, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") filed the **DEBTORS' FIRST MOTION TO REJECT CERTAIN UNEXPIRED NON-RESIDENTIAL REAL PROPERTY LEASES AND SUBLEASES EFFECTIVE AS OF NOVEMBER 12, 2008 PURSUANT TO SECTIONS 105 AND 365 OF THE BANKRUPTCY CODE** [Docket No. 31] (the "Motion"). **You were previously served with a copy of the Motion.**

PLEASE TAKE FURTHER NOTICE that on November 12, 2008, the Debtors provided individualized notices of the Motion to the counterparties to the Leases² and Subleases which referenced the Objection Deadline and hearing date set forth herein.

PLEASE TAKE FURTHER NOTICE that any objections to the relief requested in the Motion must be filed on or before **November 26, 2008 at 4:00 p.m. (ET)** (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, you must also serve a copy of the response upon the undersigned counsel to the Debtors so that the response is received on or before the Objection Deadline.

¹ The last four digits of DBSI Inc.'s federal tax identification number are 5037. The mailing address for DBSI Inc. is 12426 West Explorer Drive, Suite 220, Boise, Idaho 83713. Due to the large number of Debtors in these jointly administered cases, a complete list of the Debtors, the last four digits of their federal tax identification numbers and their addresses is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed noticing and claims agent at www.kccllc.net/dbsi, or by contacting the proposed undersigned counsel for the Debtors.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

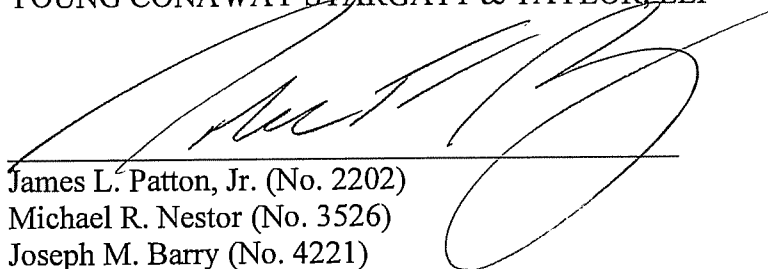


PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON DECEMBER 2, 2008 AT 2:00 P.M. (ET) BEFORE THE HONORABLE PETER J. WALSH IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 6TH FLOOR, COURTROOM # 2, WILMINGTON, DE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: Wilmington, Delaware
November 18, 2008

YOUNG CONAWAY STARGATT & TAYLOR, LLP



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*Proposed Attorneys for the Debtors
and Debtors in Possession*