

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11
: :
STARRY GROUP HOLDINGS, INC., *et al.*,¹ : Case No. 23-10219 (KBO)
: :
Debtors. : (Jointly Administered)
: :
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**DEBTORS' MOTION FOR LEAVE TO EXCEED PAGE LIMIT REQUIREMENTS
WITH RESPECT TO THE DEBTORS' OMNIBUS REPLY TO OBJECTIONS TO
DISCLOSURE STATEMENT AND DISCLOSURE STATEMENT MOTION**

Starry Group Holdings, Inc. and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), respectfully submit this motion (the “**Motion**”) for the entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), pursuant to Rule 7007-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), authorizing the Debtors to exceed the page limit requirement for the *Debtors' Omnibus Reply to Objections to Disclosure Statement and Disclosure Statement Motion* (the “**Reply**”), filed concurrently herewith. In support of this Motion, the Debtors respectfully state as follows:

1. On February 23, 2023, the Debtors filed the *Motion of Debtors for Order (A) Approving the Disclosure Statement; (B) Establishing the Voting Record Date, Voting Deadline, and Other Dates; (C) Approving Procedures for Soliciting, Receiving, and Tabulating*

¹ The debtors in these cases, along with the last four digits of each debtor's federal tax identification number, are: Starry Group Holdings, Inc. (9355); Starry, Inc. (9616); Connect Everyone LLC (5896); Starry Installation Corp. (7000); Starry (MA), Inc. (2010); Starry Spectrum LLC (N/A); Testco LLC (5226); Starry Spectrum Holdings LLC (9444); Widmo Holdings LLC (9208); Vibrant Composites Inc. (8431); Starry Foreign Holdings Inc. (3025); and Starry PR Inc. (1214). The debtors' address is 38 Chauncy Street, Suite 200, Boston, Massachusetts 02111.



Votes on the Plan and for Filing Objections to the Plan; (D) Approving the Manner and Forms of Notice and Other Related Documents; and (E) Granting Related Relief [Docket No. 84] (the “**Disclosure Statement Motion**”).

2. On March 23, 2023, the Official Committee of Unsecured Creditors filed the *Objection of the Official Committee of Unsecured Creditors to the Motion of Debtors for Order (A) Approving the Disclosure Statement; (B) Establishing the Voting Record Date, Voting Deadline, and Other Dates; (C) Approving Procedures for Soliciting, Receiving, and Tabulating Votes on the Plan and for Filing Objections to the Plan; (D) Approving the Manner and Forms of Notice and Other Related Documents; and (E) Granting Related Relief* [Docket No. 197] (the “**Committee Objection**”), and the U.S. Securities and Exchange Commission filed the *Limited Objection of the U.S. Securities and Exchange Commission to Approval of the Disclosure Statement and Confirmation of the Debtors' Joint Plan of Reorganization* [Docket No. 195] (the “**SEC Objection**”). On March 24, 2023, the U.S. Trustee Filed the *Objection of the United States Trustee to the Debtor’s Motion for Entry of an Order Approving a Disclosure Statement and Seeking Related Relief* [Docket No. 200] (the “**UST Objection**” and collectively with the Committee Objection and the SEC Objection, the “**Objections**”).

3. In advance of filing this Motion and the Reply, the Debtors filed the *Disclosure Statement for First Amended Joint Chapter 11 Plan of Reorganization for Starry Group Holdings, Inc. and its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code* (the “**Amended Disclosure Statement**”) [Docket No. 235] and the *First Amended Joint Chapter 11 Plan of Reorganization for Starry Group Holdings, Inc. and its Debtor Affiliates Under Chapter 11 of the Bankruptcy Code* (the “**Amended Plan**”) [Docket No.234].

4. Local Rule 7007-2(a)(iv), made applicable to the Reply by the General Chambers Procedures effective April 3, 2006, provides that a reply brief shall not exceed fifteen (15) pages in length. Del. Bankr. L. R. 7007-2(a)(iv). However, a reply may exceed 15 pages with leave of the Court. *Id.* The Debtors respectfully request that the Reply be allowed to exceed these page limitations.

5. The Reply, as filed, is [twenty-one (21)] pages and responds to three separate objections. Although the Debtors have made the Reply as succinct as possible under the circumstances, in light of the complexity of the matters pertinent to approval of the Amended Disclosure Statement and the Disclosure Statement Motion, and the scope of the issues raised in the Objections, the Debtors believe that they are simply unable to provide the Court with the information necessary for the full and fair adjudication of the matters to be considered if they remained subject to the fifteen (15)-page limitation. Accordingly, given the circumstances, the Debtors submit there is ample justification for the relief requested herein.

WHEREFORE, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as the Court deems just and proper.

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Dated: March 28, 2023
Wilmington, Delaware

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Counsel for Debtors and Debtors in Possession

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11
: :
STARRY GROUP HOLDINGS, INC., *et al.*,¹ : Case No. 23-10219 (KBO)
: :
Debtors. : (Jointly Administered)
: :
: **Re: Docket No. ____**
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**ORDER GRANTING DEBTORS' MOTION
FOR LEAVE TO EXCEED PAGE LIMIT REQUIREMENTS WITH
RESPECT TO THE DEBTORS' OMNIBUS REPLY TO OBJECTIONS TO
DISCLOSURE STATEMENT AND DISCLOSURE STATEMENT MOTION**

Upon the motion (the "Motion")² of the Debtors for entry of an order authorizing the Debtors to exceed the page limit prescribed by Local Rule 7007-2 in connection with the Reply; and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. § 157(b)(2) and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and this Court having determined that granting the relief requested in the Motion is in the best interest of the Debtors, their estates, and creditors; and this Court having determined that the Debtors have demonstrated sufficient justification for approval of the Motion; and after due deliberation, and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.

¹ The debtors in these cases, along with the last four digits of each debtor's federal tax identification number, are: Starry Group Holdings, Inc. (9355); Starry, Inc. (9616); Connect Everyone LLC (5896); Starry Installation Corp. (7000); Starry (MA), Inc. (2010); Starry Spectrum LLC (N/A); Testco LLC (5226); Starry Spectrum Holdings LLC (9444); Widmo Holdings LLC (9208); Vibrant Composites Inc. (8431); Starry Foreign Holdings Inc. (3025); and Starry PR Inc. (1214). The debtors' address is 38 Chauncy Street, Suite 200, Boston, Massachusetts 02111.

² All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

2. The Debtors are authorized to file the Reply in excess of the fifteen (15)-page limitation prescribed by Local Rule 7007-2(a)(iv).

3. This Court shall retain jurisdiction with respect to any and all matters arising from or related to the interpretation or implementation of this Order.