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10 Unsecured Creditors

11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **OAKLAND DIVISION**

14 In re

15 **PREDI WAVE CORPORATION,**
16 a California Corporation,

17 Debtor.

18 Case No.: 06-40547 (RJN)

19 Chapter 11

20 **MOTION OF THE OFFICIAL**
21 **COMMITTEE OF UNSECURED**
22 **CREDITORS FOR ORDER**
23 **APPROVING INFORMATION**
24 **ACCESS PROTOCOL UNDER**
25 **SECTION 1102(b)(3) OF THE**
26 **BANKRUPTCY CODE**

27 Fed. Tax I.D. No. 77-0494328

28 [Under B.L.R. 9014-1, no hearing unless
objection filed or hearing requested.]

29 The Official Committee of Unsecured Creditors (the “Committee”) of PrediWave
30 Corporation (the “Debtor”) hereby moves this Court (the “Motion”) for entry of an order, pursuant to
31 sections 105(a), 107(b), and 1102(b)(3)(A) of title 11 of the United States Code (the “Bankruptcy
32 Code”) and Rule 9018 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”),
33 approving the Committee’s adoption of certain information-sharing procedures pursuant to newly-
34 enacted section 1102(b)(3)(A) of the Bankruptcy Code.

35 **RELIEF REQUESTED**

36 By this Motion, the Committee requests authority to (1) withhold confidential and privileged
37 information under the “information access” prong of the statute, and (2) satisfy its duties under the
38 “comment solicitation” prong of the statute by means of a link to a web page posted on, and

1 accessible via, proposed Committee counsel's existing internet site (or, if infeasible, via another web
2 site dedicated to the Committee). The Committee is cognizant of the Debtor's operating constraints
3 and, hence, seeks to satisfy its information-sharing obligations in as streamlined and inexpensive a
4 manner as possible. To the extent that proposed Committee counsel incurs any out-of-pocket
5 expenses in connection with the establishment and maintenance of the web page, the Committee
6 requests authority to require reimbursement from the Debtor for such charges (which are estimated
7 to be approximately \$1,000 to \$3,000, depending on the potential need for a unique domain name
8 and dedicated hardware to host the site).

9 **WHEREFORE**, the Committee respectfully requests that the Court enter an order approving
10 the relief requested in this Motion and granting the Committee such other and further relief as the
11 Court deems appropriate.

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13 Dated: May 26, 2006

PACHULSKI STANG ZIEHL YOUNG JONES
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15 By /s/ Ramon M. Naguiat
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17 [Proposed] Attorneys for the Official
18 Committee of Unsecured Creditors
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