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ATTORNEYS FOR THE DEBTORS AND DEBTORS-IN-POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re)	Chapter 11 Case
)	
MIRANT CORPORATION, <u>et al.</u> ,)	Case No. 03-46590-DML
)	Jointly Administered
Debtors.)	

**REQUEST FOR EXPEDITED CONSIDERATION OF MOTION OF THE DEBTORS
FOR AN ORDER PURSUANT TO BANKRUPTCY RULE 3003(c)(1) (I)
ESTABLISHING A BAR DATE FOR FILING CERTAIN PROOFS OF CLAIM; (II)
ESTABLISHING RAMIFICATIONS FOR FAILURE TO COMPLY THEREWITH; (III)
APPROVING PROOF OF CLAIM FORM AND CONSOLIDATED NOTICE OF (A)
CASE COMMENCEMENT, (B) BAR DATE, AND (C) FIRST MEETING OF
CREDITORS UNDER SECTION 341(a) OF THE BANKRUPTCY CODE; AND (IV)
APPROVING NOTICE AND PUBLICATION PROCEDURES**

On August 5, 2003, Mirant Corporation and certain of its subsidiaries and affiliates (collectively, the “Debtors”) filed the Motion of the Debtors for an Order Pursuant to Bankruptcy Rule 3003(c)(1) (I) Establishing Bar Date for Filing Certain Proofs of Claim; (II) Establishing Ramifications for Failure to Comply Therewith; (III) Approving Proof of Claim Form and Consolidated Notice of (A) Case Commencement, (B) Bar Date, and (C) First Meeting of Creditors under Section 341(a) of the Bankruptcy Code; and (IV) Approving Notice and Publication Procedures (the “Motion”). The Debtors hereby request expedited consideration of the Motion.

1. The Debtors request that the Court hear the Motion on an expedited basis on Thursday, August 21, 2003 at 2:30 p.m. The Debtors request expedited consideration of the Motion because the Debtors intend to serve a consolidated notice of (i) the commencement of these cases; (ii) the meeting of creditors pursuant to section 341 of the Bankruptcy Code (the "341 Meeting"); and (iii) the proof of claim bar date. The Debtors believe that a consolidated notice will add to the administrative efficiency of these proceedings and will preserve estate assets.

2. The United States Trustee has scheduled the 341 Meeting for September 17, 2003. Notices of the 341 Meeting must, therefore, be served on or before August 27, 2003. In order to serve the consolidated notice before August 27, 2003 the Debtors seek expedited consideration of the Motion so that the Debtors may have ample time to copy and assemble the approximately 200,000 notices that must be served in these proceedings.

3. Accordingly, the Debtors request that the Court enter an Order setting a hearing on the Motion on Thursday, August 21, 2003 at 2:30 p.m.

RESPECTFULLY SUBMITTED THIS 5th DAY OF AUGUST, 2003

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By /s/ Robin Phelan
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**ATTORNEYS FOR THE DEBTORS
AND DEBTORS-IN-POSSESSION**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has authorized BSI as service agent to cause to serve a true and correct copy of the foregoing upon all parties on the Limited Service List via United States first class mail, postage prepaid, on the 5th day of August, 2003 in accordance with the Federal Rules of Bankruptcy Procedure.

/s/ Robin E. Phelan

**THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

)		
In re)	Chapter 11 Case	
)		
MIRANT CORPORATION, <u>et al.</u> ,)	Case No. 03-46590-DML	
)	Jointly Administered	
Debtors.)		

**ORDER EXPEDITING CONSIDERATION OF MOTION OF THE
DEBTORS FOR AN ORDER PURSUANT TO BANKRUPTCY RULE 3003(c)(1) (I)
ESTABLISHING A BAR DATE FOR FILING CERTAIN PROOFS OF
CLAIM; (II) ESTABLISHING RAMIFICATIONS FOR FAILURE TO COMPLY
THEREWITH; (III) APPROVING PROOF OF CLAIM FORM AND CONSOLIDATED
NOTICE OF (A) CASE COMMENCEMENT, (B) BAR DATE, AND (C) FIRST
MEETING OF CREDITORS UNDER SECTION 341(a) OF THE BANKRUPTCY CODE;
AND (IV) APPROVING NOTICE AND PUBLICATION PROCEDURES**

Came before the Court for consideration the Request for Expedited Consideration (the “Request”) of the Motion of the Debtors for an Order Pursuant to Bankruptcy Rule 3003(c)(1) (I) Establishing Bar Date for Filing Certain Proofs of Claim; (II) Establishing Ramifications for Failure to Comply Therewith; (III) Approving Proof of Claim Form and Consolidated Notice of (A) Case Commencement, (B) Bar Date, and (C) First Meeting of Creditors under Section 341(a) of the Bankruptcy Code; and (IV) Approving Notice and Publication Procedures (the “Motion”) filed by Mirant Corporation and certain of its subsidiaries and affiliates (collectively, the “Debtors”). After considering the Request and the representations made therein, the Court finds that the Request has merit and should be granted. It is therefore, hereby

ORDERED that the Request is granted in full and in all respects; and it is further

ORDERED that hearing on the Motion is set for Thursday, August 21, 2003 at 2:30 p.m.; and it is further

ORDERED that the Debtors shall serve immediately a copy of this Order on all parties upon whom the Debtors served the Motion.

Signed this ____ day of August, 2003.

Honorable D. Michael Lynn
United States Bankruptcy Judge