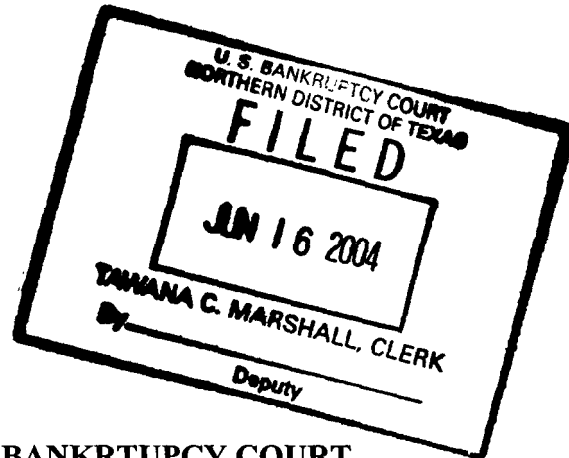


Michael J. Durrschmidt
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Attorneys for Florida Business Technologies

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

IN RE:

MIRANT CORPORATION,

Debtor.

§
§
§
§
§

CASE NO. 03-46590
(Chapter 11)

**MOTION REQUESTING ALLOWANCE AND IMMEDIATE
PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

COMES NOW, Florida Business Technologies (“Applicant”) and hereby files this Motion Requesting Allowance and Immediate Payment of Administrative Expense Claim (the “Motion”) wherein, Applicant requests entry of an order under 11 U.S.C. § 503(b) allowing and directing the immediate payment of an administrative expense claim in the amount of \$69,550.00. In support of the Motion, Applicant shows as follows:

1. On July 14, 2003 (the “Petition Date”), Mirant Corporation (“Debtor”) filed for bankruptcy protection under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ et. seq., (as amended, modified, or supplemented the “Bankruptcy Code”). Debtor continues to operate its business as a debtor in possession in accordance with Sections 1107 and 1108 of the Bankruptcy Code.

2. Applicant sells computer software, provides support for software, and licenses the use of various software.

3. On July 11, 2003, Applicant delivered the Right FAX Software and Dialogic Fax Hardware to the Debtor. Attached hereto and incorporated herein by reference as Exhibit "A" is the July 17, 2003 reclamation letter sent to the Debtor and supporting documentation.

4. Installation and service of the software products and licenses was completed after the Petition Date. Debtor continues to use Applicant's products and services on a daily basis to conduct its business operation.

5. Applicant shows that all computer software and hardware for which it seeks allowance and immediate payment of as an administrative expense claim were installed and provided by the Debtor post-petition.

6. Pursuant to Section 503(b) of the Bankruptcy Code, the actual, necessary costs and expenses of preserving the estate shall be allowed as administrative expenses. Applicant installed and provided customer support, and hardware and software support for the Debtor post-petition. Debtors utilized and continue to utilize Applicant's products, both hardware and software, and Applicant's support and licensing services on a daily basis in connection with ongoing business operations. Mirant uses the hardware and software program for desktop and production faxing. The hardware and software allows the various operational departments to send and receive faxes from each employee's individual computer. Applicant, under a software maintenance agreement, also provides Debtor with telephone support from 5:00 a.m. through 8:00 p.m., Monday through Saturday and Applicant also provides Debtor with software upgrades under this agreement. The products and support services were are necessary for continued business operations and represent to preserve the estate and continue business operations.

Accordingly, Applicant is entitled to allowance and immediate payment in the amount of \$69,500.00 for the Right FAX Software and Dialogic Fax Hardware.

WHEREFORE, Applicants requests that the Court enter an order granting this Motion and under 11 U.S.C. § 503(b) allow and direct the immediate payment to Applicant of an administrative expense claim in the amount of \$69,500.00 and grant such further relief as the Court deems proper.

Respectfully submitted this 15th day of June, 2004.

HIRSCH & WESTHEIMER, P.C.

By: 

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OF COUNSEL:

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ATTORNEYS FOR FLORIDA BUSINESS
TECHNOLOGIES

and

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& STOUT, P.A.

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Atlanta, Georgia 30326
(404) 262-7373 Telephone
(404) 262-9911 Facsimile

ATTORNEYS FOR FLORIDA BUSINESS
TECHNOLOGIES

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **Motion Requesting Allowance and Immediate Payment of Administrative Expense Claim** Motion was served by first class mail, postage prepaid, facsimile and/or electronic mail by the Clerk of the Court via the ECM system, as listed below on June 15, 2004.

Judith Elkin, Esq.
Meredyth A. Purdy, Esq.
Haynes & Boone
901 Main Street
Suite 3100
Dallas, Texas 75202

M. Denise Dotson
3343 Peachtree Road, N.E.
East Tower, Suite 550
Atlanta, Georgia 30326

A handwritten signature in black ink, appearing to read "Michael J. Durrschmidt", is written over a solid horizontal line.

Michael J. Durrschmidt



FLORIDA BUSINESS
TECHNOLOGICAL SERVICES

July 17, 2003

Mr. Steve Gillis
 Mirant Corporation
 1155 Perimeter Center West
 Atlanta, GA 30338

RE: Chapter 11 Right Of Reclamation

Dear Mr Gillis:

Under the Uniform Commercial Code in the United States, a seller of goods has the right to reclaim goods from an insolvent buyer. This right is specifically protected by section 546(c) of the U.S. Bankruptcy Code. Under section 2-702(2) of the Uniform Commercial Code, a seller may reclaim goods if (1) the buyer received the goods on credit, (2) the goods were received while the buyer was insolvent, and (3) the seller makes a demand for the return of the goods within 10 days after receipt.

Please immediately return the RightFAX Software and Dialogic Fax Hardware I delivered to your office on Friday the 11th @ 9:30 a.m. I have enclosed several supporting documents which will help you identify the goods that I am reclaiming.

Supporting Documents:

- Copy of Mirant purchase order number 20371585-2IS, totaling \$65,000.00.
- Copy of serial numbers for software and hardware
- Copy of FBT Invoice number 3857, totaling \$69,550.00

Dialogic Fax Hardware and RightFAX Software Licenses:

Description	Serial #
RF Additional Channel v8.x	SNN669595
RF Additional Channel v8.x	SNN669596
RF Additional Channel v8.x	SNN669597
RF Additional Channel v8.x	SNN669598
RF Additional Channel v8.x	SNN669599
RF Additional Channel v8.x	SNN669600
RF Additional Channel v8.x	SNN669601
RF Additional Channel v8.x	SNN669602
RF Additional Channel v8.x	SNN669603
RF Additional Channel v8.x	SNN669604
RF Additional Channel v8.x	SNN669605
RF Additional Channel v8.x	SNN669608
RF Additional Channel v8.x	SNN669609
RF Additional Channel v8.x	SNN669610
RF Additional Channel v8.x	SNN669611
RF Additional Channel v8.x	SNN669612

1117 Perimeter Center West, Suite 500 East Atlanta, GA 30338 Office: 770-392-3380 Fax: 407-647-8768





Purchase Order	
PURCHASE ORDER NO. 20311557	REVISION: PAGE 0 1
IMPORTANT PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICED AND PACKING SLIPS FOR PAYMENT TO BE PROCESSED	
Miran Inc 1155 Perimeter Center West Suite 100 Atlanta, GA 30338 United States	
Miran Inc 1155 Perimeter Center West Suite 100 Atlanta, GA 30338 United States	

Attn: Doug Olive
(4) 647-8768 3 pages

VENDOR:
FLORIDA BUSINESS TECHNOLOGIES LLC
631 N. WYMORE RD SUITE 150
MAITLAND, FL 32751

CUSTOMER ACCT. NO.	VENDOR NO. 39783	DATE OF ORDER/BUYER 26 JUN-03 Soto	REVISED DATE/BUYER
PAYMENT TERMS NET 30	SHIP VIA	FORB	Freight & Fee
FREIGHT TERMS Prepay Add	REQUESTOR/DELIVER TO Vance Stephen	CONTRACT TELEPHONE (404) 647-8765	

ITEM	PART NUMBER / DESCRIPTION	DELIVERY DATE	QUANTITY	UNIT	UNIT PRICE	EXTENSION	TAX
	The terms and conditions of Florida Business Technologies quote #02NQ2548 dated 6/18/03 shall apply to this transaction. Purchase order number and invoice contact name (Maria Fazio) must appear on invoice to ensure timely remittance.						
	Requisition #20311557						
	Florida Business Technologies Attn: Doug Olive Fax: 404.647.8768						
1	RightFax Enterprise Server v8.5 Server license - 1 channel, unlimited users, includes WebClient, OCR router/connector, Docs on Demand, Teleconnect Modules		2	Each	3995	7,990.00	
2	RightFax Additional Fax Channel License		46	Each	795	36,570.00	
3	8.5 RightFax E-mail Gateway for Microsoft Exchange, unlimited users		2	Each	1595	3,190.00	

Total Continued

MIRANT

Purchase Order

PURCHASE ORDER NO. 20321585-216 REVISION 0 PAGE 2

IMPORTANT
PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICES AND PACKING SLIPS FOR PAYMENT TO BE PROCESSED

SHIP TO:
Mirant, Inc.
155 Perimeter Center West
Suite 100
Atlanta, GA 30338
United States

SHIP TO:
Mirant, Inc.
155 Perimeter Center West
Suite 100
Atlanta, GA 30338
United States

VENDOR:

FLORIDA BUSINESS TECHNOLOGIES LLC
631 N. WYMORE RD SUITE 150
MAITLAND, FL 32751

CUSTOMER ACCT NO. VENDOR NO. 39783 DATE OF ORDER/BUYER 26 JUN 03 SLOC, E REVISED DATE / BUYER

PAYMENT TERMS NET 30 SHIP VIA Prepay & Add CONFIRM TO TELEPHONE (804) 647-8765

FREIGHT TERMS Prepay & Add REQUESTOR/DELIVER TO Nancy Stephen

ITEM	PART NUMBER / DESCRIPTION	DELIVERY DATE	QUANTITY	UNIT	UNIT PRICE	EXTENSION	TAX
4	CPI/2400 CT-T1 uPCI 24-Channel Fax Board - dialogic, Universal PCI single slot, Dual T1 interface		2.00	Each	10900	21,800.00	
5	Premium Support Plan - 1 yr free version upgrades & unlimited incidents/support issues during regular business hours. Version upgrades for the RightFax products currently owned.					7,162.00	
6	ImageQuest Archiving Module for RightFax		1.00	Each	5500	5,500.00	
7	Customer trade-in discount for Fax Senior (original software CDs must be submitted with order, or copy of original PO or system invoice must be provided with new RightFax system order. Value - \$17,212		1.00	Each	0	0.00	

Total Continued

JUN-26-2003 15:01



Purchase Order

PURCHASE ORDER NO. 20371865-215 REVISION PAGE 1 D 3

IMPORTANT
PURCHASE ORDER NUMBER MUST APPEAR ON ALL INVOICES AND PACKING SLIPS FOR PAYMENT TO BE PROCESSED

SHIP TO:
1155 Perimeter Center West
Suite 300
Atlanta, GA 30338
United States

SHIP TO:
Mirant Inc
1155 Perimeter Center West
Suite 300
Atlanta, GA 30338
United States

VENDOR:

FLORIDA BUSINESS TECHNOLOGIES LLC
631 N. WYMORE RD SUITE 150
MAITLAND, FL 32751

CUSTOMER ACCT NO. VENDOR NO. 19783 DATE OF ORDER/BUYER 26 JUN-03 Soto, E REVISED DATE/BUYER

PAYMENT TERMS NET 30 SHIP VIA Prepay & Add CONFIRM TO TELEPHONE (404) 647-8765

FREIGHT TERMS Prepay & Add REQUESTOR/DELIVER TO Vance, Stephen

ITEM	PART NUMBER / DESCRIPTION	DELIVERY DATE	QUANTITY	UNIT	UNIT PRICE	EXTENSION	TAX
						Total	82,212.00

Ernie J. [Signature]
AUTHORIZED SIGNATURE

CUSTOMER PRODUCT LIST

Selected Company: Mirant Inc.

Click on a **Product ID** to see details.

Product ID	Product Number	Description	Serial #
655746	2000-00000-05	RF Additional Channel v8.x	SNN669595
655747	2000-00000-05	RF Additional Channel v8.x	SNN669596
655748	2000-00000-05	RF Additional Channel v8.x	SNN669597
655749	2000-00000-05	RF Additional Channel v8.x	SNN669598
655750	2000-00000-05	RF Additional Channel v8.x	SNN669599
655751	2000-00000-05	RF Additional Channel v8.x	SNN669600
655752	2000-00000-05	RF Additional Channel v8.x	SNN669601
655753	2000-00000-05	RF Additional Channel v8.x	SNN669602
655754	2000-00000-05	RF Additional Channel v8.x	SNN669603
655755	2000-00000-05	RF Additional Channel v8.x	SNN669604
655756	2000-00000-05	RF Additional Channel v8.x	SNN669605
655759	2000-00000-05	RF Additional Channel v8.x	SNN669608
655760	2000-00000-05	RF Additional Channel v8.x	SNN669609
655761	2000-00000-05	RF Additional Channel v8.x	SNN669610
655762	2000-00000-05	RF Additional Channel v8.x	SNN669611
655763	2000-00000-05	RF Additional Channel v8.x	SNN669612
655764	2000-00000-05	RF Additional Channel v8.x	SNN669613
655765	2000-00000-05	RF Additional Channel v8.x	SNN669614
655766	2000-00000-05	RF Additional Channel v8.x	SNN669615
655767	2000-00000-05	RF Additional Channel v8.x	SNN669616
655768	2000-00000-05	RF Additional Channel v8.x	SNN669617
655769	2000-00000-05	RF Additional Channel v8.x	SNN669618
655770	2000-00000-05	RF Additional Channel v8.x	SNN669619
655771	2000-00000-05	RF Additional Channel v8.x	SNN669620
655772	2000-00000-05	RF Additional Channel v8.x	SNN669621
655773	2000-00000-05	RF Additional Channel v8.x	SNN669622
655774	2000-00000-05	RF Additional Channel v8.x	SNN669623
655775	2000-00000-05	RF Additional Channel v8.x	SNN669624
655776	2000-00000-05	RF Additional Channel v8.x	SNN669625
655777	2000-00000-05	RF Additional Channel v8.x	SNN669626
655778	2000-00000-05	RF Additional Channel v8.x	SNN669627
655779	2000-00000-05	RF Additional Channel v8.x	SNN669628
655780	2000-00000-05	RF Additional Channel v8.x	SNN669629
655781	2000-00000-05	RF Additional Channel v8.x	SNN669630
655782	2000-00000-05	RF Additional Channel v8.x	SNN669631
655757	2000-00000-05	RF Additional Channel v8.x	SNN669606
655758	2000-00000-05	RF Additional Channel v8.x	SNN669607
655783	2000-00000-05	RF Additional Channel v8.x	SNN669632
655784	2000-00000-05	RF Additional Channel v8.x	SNN669633
655785	2000-00000-05	RF Additional Channel v8.x	SNN669634
655786	2000-00000-05	RF Additional Channel v8.x	SNN669635
655787	2000-00000-05	RF Additional Channel v8.x	SNN669636
655788	2000-00000-05	RF Additional Channel v8.x	SNN669637
655789	2000-00000-05	RF Additional Channel v8.x	SNN669638

<u>655790</u>	2000-00000-05	RF Additional Channel v8.x	SNN669639
<u>655791</u>	2000-00000-05	RF Additional Channel v8.x	SNN669640
<u>655792</u>	2025-40224-00	CPI/2400CT-T1 uPCI Universal	HX0100314
<u>655793</u>	2025-40224-00	CPI/2400CT-T1 uPCI Universal	HX010054

<u>655794</u>	2000-85004-00	8.5 Gateway MS Exchange	EME0850794
<u>655795</u>	2000-85000-20	8.5 Enterprise Server	ENT0850869
<u>655796</u>	2000-85000-20	8.5 Enterprise Server	ENT0850871
<u>655797</u>	2000-85004-00	8.5 Gateway MS Exchange	EME0850831
<u>655798</u>	2010-00022-00	Premium Support Plan	
<u>655799</u>	2010-00022-00	Premium Support Plan	



FLORIDA BUSINESS
TECHNOLOGIES

Florida Business Technologies, LLC
Post Office Box 940718
Maitland, FL 32794-0718
407-647-8765

DATE INVOICE #
6/30/2003 3857

BILL TO

Mirant Inc.
1155 Perimeter Center West
Suite 100
Atlanta, GA 30338
Attn: Maria Fazio

P.O. NUMBER	TERMS	PROJECT
20371585-2IS	Net 30	

QUANTITY	DESCRIPTION	RATE	AMOUNT
2	RightFAX Enterprise Server v8.5-Server License-1 Channel, Unlimited Users, Includes WebClient, OCR router/connector, Docs on Demand, Teleconnect Modules SO# 030659	3,995.00	7,990.00T
46	RightFax Additional Fax Channel License for Business or Enterprise Server. Not compatible with Production System and Components	795.00	36,570.00T
2	8.5 RightFax E-Mail Gateway for Microsoft Exchange Licensed for Unlimited Users	1,595.00	3,190.00T
2	CPI/2400 CT-T1 uPCI Twenty four Channel fax board - Dialogic, Universal PCI Single Slot, Dual T1 interface	10,900.00	21,800.00T
2	Premium Support Plan	3,581.00	7,162.00T
1	ImageQuest Archiving Module for RightFax	5,500.00	5,500.00T
1	Customer Trade In Discount for Fax Senior: To qualify for the trade in, the original software CS's must be submitted with the order or alternatively, a copy of the original purchase order or system invoice must be provided with the new RightFAX system order.	-17,212.00	-17,212.00T
	BO# 030658		
	This invoice replaces original invoice # 3822		
		Sales Tax (7.0%)	\$4,550.00
Thank you for your business		TOTAL	\$69,550.00