

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

In re	)	CHAPTER 11
	)	
COACH AM GROUP	)	Case No. 12-10010 (KG)
HOLDING CORP., <i>et al.</i> ,	)	Jointly Administered
	)	
Debtors	)	Hearing Date: February 13, 2012 at 10:00 a.m.
	)	Objections Due: February 6, 2012 at 4:00 p.m.

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**NOTICE OF MOTION OF MICHAEL GALUSHA AND DAWN GALUSHA  
FOR RELIEF FROM STAY UNDER SECTION 362(d)  
OF THE BANKRUPTCY CODE**

TO: THE PARTIES ON THE ATTACHED SERVICE LIST:

MICHAEL GALUSHA AND DAWN GALUSHA (“Movants”) have filed a Motion for Relief from the Automatic Stay which seeks, *inter alia* the following relief: to proceed with a lawsuit against debtors in order to recover insurance proceeds.

A HEARING ON THE MOTION WILL BE HELD ON FEBRUARY 13, 2012 AT 10:00 A.M. AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 6TH FLOOR, WILMINGTON, DE 19801.

You are required to file a response (and the supporting documentation required by Local Rule 4001-1(e)) to the attached motion at least seven days before the above hearing date.

At the same time you must also serve a copy of the response upon Movants’ counsel at the addresses listed below.

**ANY RESPONSE MUST BE FILED AND SERVED TOGETHER WITH A CERTIFICATE OF SERVICE ON OR BEFORE FEBRUARY 6, 2012 AT 4.00 P.M. FAILURE TO TIMELY FILE AND SERVE A RESPONSE WILL RESULT IN AN ORDER GRANTING THE RELIEF REQUESTED IN THE MOTION.**

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

DATED: January 27, 2012

/s/ Christopher D. Loizides  
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Galusha*