IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
COACH AM GROUP HOLDINGS CORP.,) Case No. 12-10010 (KG)
Debtor.	Jointly Administered
) Re: Docket No. 1746

CERTIFICATION OF COUNSEL REGARDING ORDER (I) CLOSING CASE OF COACH AM GROUP HOLDINGS CORP. AND (II) GRANTING RELATED RELIEF

The undersigned hereby certifies the following:

- 1. On March 28, 2014, SLTNTRST LLC dba Solution Trust (the "GUC Trustee") of the GUC Trust approved by the Court in the above-captioned case has filed *The GUC Trustee's Motion to (A) Reopen Coach Am Group Holdings Corp. Case, and (B) Granting Related Relief to Reclose the Case* (the "Motion to Reopen") [Docket No. 1746].
- 2. Pursuant to the Notice of the Motion to Reopen, responses were due by April 11, 2014 at 4:00 p.m. (the "Objection Deadline"). The undersigned further certifies that, other than as indicated herein, no answer, objection or other responsive pleading has been received to the Motion to Reopen and a review of the Court's docket in this case shows no answer, objection or other responsive pleading to the Motion to Reopen.
- 3. In accordance with the proposed certification of counsel and proposed order to reclose the case attached as <u>Exhibit B</u> to the Motion to Reopen and in connection with the No TIN Motion (filed contemporaneously with the Motion to Reopen and scheduled for the same hearing on April 30, 2014 at 3:00 p.m.), the GUC Trustee hereby submits the proposed order to reclose the case attached hereto as <u>Exhibit 1</u> (the "<u>Proposed Reclosing Order</u>"). The

GUC Trustee has filed a certificate of counsel on the No TIN Motion contemporaneously with this certification of counsel.

4. Accordingly, the GUC Trustee respectfully requests entry of the Proposed Reclosing Order at the Court's earliest convenience, and after entry of the order granting the Motion to Reopen and revised order granting the No TIN Motion.

Dated: April 28, 2014

PACHULSKI STANG ZIEHL & JONES LLP

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