

## **Exhibit A**

### **Bar Date Order**

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

In re:

COACH AM GROUP HOLDINGS CORP.,  
*et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 12-10010 (KG)

(Jointly Administered)

**Re: Docket No.**

**ORDER PURSUANT TO 11 U.S.C. §§ 105(a) AND 503(b)(9), FED. R. BANKR. P.  
2002 AND 3003(c)(3) AND DEL. BANKR. L.R. 2002-1(e) (I) ESTABLISHING  
BAR DATES FOR FILING PROOFS OF CLAIM AND (II) APPROVING  
THE FORM AND MANNER OF NOTICE THEREOF**

Upon consideration of the motion (the “**Motion**”)<sup>2</sup> of the Debtors for entry of an order pursuant to sections 105(a), 503(b)(9) of the Bankruptcy Code, Bankruptcy Rules 2002 and 3003(c)(3) and Local Rule 2002-1(e) establishing bar dates for filing proofs of claim and (ii) approving the form and manner of notice thereof; and upon consideration of the First Day

<sup>1</sup> Coach Am Group Holdings Corp. (4830); Coach Am Holdings Corp. (1816); Coach America Holdings, Inc. (2841); American Coach Lines, Inc. (2470); America Charters, Ltd. (8246); American Coach Lines of Atlanta, Inc. (4003); American Coach Lines of Jacksonville, Inc. (0136); American Coach Lines of Miami, Inc. (7867); American Coach Lines of Orlando, Inc. (0985); Coach America Group, Inc. (2816); B & A Charter Tours, Inc. (9392); Dillon’s Bus Service, Inc. (5559); Florida Cruise Connection, Inc. (9409); Hopkins Airport Limousine Services, Inc. (1333); Lakefront Lines, Inc. (5309); The McMahon Transportation Company (0030); Midnight Sun Tours, Inc. (2791); Royal Tours of America, Inc. (2313); Southern Coach Company (6927); Tippet Travel, Inc. (8787); Trykap Airport Services, Inc. (0732); Trykap Transportation Management, Inc. (2727); KBUS Holdings, LLC (6419); ACL Leasing, LLC (2058); CAPD, LLC (4454); Coach America Transportation Solutions, LLC (6909); CUSA, LLC (3523); CUSA ASL, LLC (2030); CUSA AT, LLC (2071); CUSA AWC, LLC (2084); CUSA BCCAE, LLC (2017); CUSA BESS, LLC (3610); CUSA CC, LLC (1999); CUSA CSS, LLC (9896); CUSA EE, LLC (1982); CUSA ELKO, LLC (4648); CUSA ES, LLC (1941); CUSA FL, LLC (1920); CUSA GCBS, LLC (1891); CUSA GCT, LLC (1833); CUSA KBC, LLC (1808); CUSA K-TCS, LLC (1741); CUSA Leasing, LLC (1321); CUSA PCSTC, LLC (1701); CUSA PRTS, LLC (1591); CUSA RAZ, LLC (0640); CUSA Transit Services, LLC (8847); Get A Bus, LLC (1907); Coach BCCAE, L.P. (3488); Coach Leasing BCCAE, L.P. (6784). The Debtors’ corporate offices are located at 8150 North Central Expressway, Suite M1000, Dallas, Texas 75206.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Declaration; and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. § 157(b)(2); and the Court having determined that granting the relief requested in the Motion is in the best interests of the Debtors, their estates and creditors; and notice of the Motion being sufficient under the circumstances; and after due deliberation and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. The Motion is granted, as set forth herein.
2. As used herein, (a) the term “claim” has the meaning given to it in section 101(5) of the Bankruptcy Code, and (b) the term “entity” has the meaning given to it in section 101(15) of the Bankruptcy Code.
3. The forms of the Bar Date Notice, the Publication Notice and the Proof of Claim Form, and the manner of providing notice of the Bar Dates proposed in the Motion, are approved in all respects pursuant to Bankruptcy Rules 2002(a)(7) and 2002(l). The form and manner of notice of the Bar Dates approved herein are deemed to fulfill the notice requirements of the Bankruptcy Code and the Bankruptcy Rules.
4. Except as otherwise provided herein, any person or entity (excluding governmental units) holding a claim or interest against the Debtors that arose or is deemed to have arisen prior to the Petition Date must file a proof of claim or interest on or before April 2, 2012 at 5:00 p.m. (prevailing Eastern time) (the “**General Bar Date**”).
5. The General Bar Date applies to all types of claims against the Debtors that arose prior to the Petition Date, including secured claims, unsecured priority claims (including, without limitation, claims entitled to priority under sections 507(a)(4) and (5), and 503(b)(9) of the Bankruptcy Code) and unsecured nonpriority claims. The filing of a proof of claim form shall be deemed to satisfy the procedural requirements for the assertion of administrative priority claims under section 503(b)(9) of the Bankruptcy Code, without the need for any further request for payment to be made to the Court under Section 503 of the Bankruptcy Code. All other Administrative Claims under section 503(b) of the Bankruptcy Code shall be

made by separate requests for payment in accordance with section 503(a) of the Bankruptcy Code and shall not be deemed proper if made by proof of claim. Claims under section 503(b)(9) of the Bankruptcy Code must be filed by proof of claim form by the General Bar Date in accordance with this Order and the procedures herein.

6. Except as otherwise provided herein, any governmental unit (as defined in section 101(27) of the Bankruptcy Code) holding a claim against the Debtors that arose or is deemed to have arisen prior to the Petition Date must file a proof of claim on or before July 1, 2012 at 5:00 p.m. (prevailing Eastern time) (the “**Governmental Unit Bar Date**”).

7. The Governmental Unit Bar Date applies to all governmental units holding claims against the Debtors (whether secured, unsecured priority or unsecured nonpriority) that arose prior to the Petition Date, including governmental units with claims against the Debtors for unpaid taxes, whether such claims arise from prepetition tax years or periods or prepetition transactions to which the Debtors were a party.

8. Subject to the exceptions described in paragraphs 9 and 10 below, the following entities must file a proof of claim on or before the General Bar Date:

- (a) any entity (i) whose prepetition claim against the Debtors is not listed in the Debtors’ Schedules or is listed as disputed, contingent or unliquidated and (ii) that desires to participate in this Chapter 11 Cases or share in any distribution in the Chapter 11 Cases; and
- (b) any entity that believes that its prepetition claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires to have its claim allowed in a classification or amount other than that identified in the Schedules.

9. The following procedures must be utilized by each person or entity seeking to file a proof of claim in the Chapter 11 Cases:

- (a) Proofs of claim must be on the Proof of Claim Form attached to the Motion as **Exhibit B** or otherwise conform substantially to Official Bankruptcy Form No. 10;
- (b) Proofs of claim must be filed either by: (i) mailing to BMC Group, Inc., Attn: Coach America Claims Processing, P.O. Box 3020, Chanhassen,

Minnesota 55317-3020 or (ii) delivering the original proof of claim by hand or overnight courier to BMC Group, Inc., Attn: Coach America Claims Processing, 18675 Lake Drive East, Chanhassen, Minnesota 55317. Proofs of claim submitted by facsimile or electronic mail shall not be accepted and shall not be deemed properly filed;

- (c) Proofs of claim will be deemed filed only when **actually received** by the Debtors' claims agent, BMC Group, Inc. ("**BMC Group**"), at the address above on or before the applicable Bar Date. If a creditor wishes to receive acknowledgement of BMC Group's receipt of a proof of claim, the creditor also must submit such proof of claim to BMC Group by the applicable Bar Date and concurrently with submitting its original proof of claim submit (i) a copy of the original proof of claim and (ii) a self-addressed, postage prepaid return envelope;
- (d) Proofs of claim must: (i) be signed; (ii) include supporting documentation (or, if such documents are voluminous, a summary) or an explanation as to why documentation is not available; (iii) be in the English language; and (iv) be denominated in United States currency; and

10. The following persons or entities are *not* required to file a proof of claim or interest on or before the Bar Date:

- (a) any person or entity that has *already* properly filed a proof of claim against or interest in the applicable Debtor or Debtors with the Clerk of the Bankruptcy Court for the District of Delaware in a form substantially similar to the Proof of Claim Form;
- (b) any person or entity whose claim or interest is listed on the Schedules; *provided* that (i) the claim or interest is *not* scheduled as "disputed," "contingent" or "unliquidated," (ii) the person or entity agrees with the amount, nature and priority of the claim or interest as set forth in the Schedules *and* (iii) the person or entity agrees that the claim or interest is an obligation of the specific Debtor against which the claim or in which the interest is listed on the Schedules;
- (c) any person or entity that holds a claim that has been allowed by an order of the Court entered on or before the applicable Bar Date;
- (d) any person or entity whose claim has been paid in full by any of the Debtors;
- (e) any current employee of the Debtors, and any labor union authorized by law to represent any current employee, in each case solely with respect to any claim based on the payment of wages, salaries and vacation pay arising in the ordinary course of business and previously authorized to be paid by order of the Court, including the interim and final wage orders

approved by the Court, *provided, however*, that if the Debtors provide written notice to any current employee stating that the Debtors do not intend to exercise their authority to pay such claim, such employee shall have until the later of (i) the applicable Bar Date and (ii) 30 days from the date of service of such written notice, to file a proof of claim;

- (f) any person or entity that holds a claim or interest for which specific deadlines have been fixed by an order of the Court entered on or before the applicable Bar Date;
- (g) any person or entity that holds a claim allowable under sections 503(b) and 507(a) of the Bankruptcy Code as an expense of administration (other than any unpaid administrative expense claim allowable under section 503(b)(9) of the Bankruptcy Code);
- (h) any Debtor;
- (i) any person or entity whose claim is limited exclusively to the repayment of principal, interest and other fees and expenses (a “**Debt Claim**”) under the agreements governing any syndicated credit facility; *provided, however*, that (i) the foregoing exclusion in this subparagraph shall not apply to the administrative agent under the applicable credit facility, (ii) each administrative agent shall be authorized and required to file a single proof of claim, on or before the applicable Bar Date, on account of all Debt Claims against all Debtors under the applicable credit facility and (iii) any holder of a Debt Claim wishing to assert a claim, other than a Debt Claim, arising out of or relating to a credit facility, shall be required to file a proof of claim with respect to such claim on or before the applicable Bar Date, unless another exception identified herein applies; and
- (j) any entity holding an interest in the Debtors (an “**Interest Holder**”), which interest is based exclusively upon the ownership of common or preferred stock in a corporation or warrants or rights to purchase, sell or subscribe to such a security or interest (any such security or interest being referred to herein as an “**Interest**”); *provided, however*, that Interest Holders who wish to assert claims against the Debtors that arise out of or relate to the ownership or purchase of an Interest, including claims arising out of or relating to the sale, issuance or distribution of the Interest, must file proofs of claim on or before the General Bar Date, unless another exception contained in this Order applies.

11. In accordance with paragraph 10(e) above, any current salaried or current non-bargaining unit hourly employee of the Debtors holding a claim relating solely to wages, salaries, commissions, vacation, benefits, pension or retirement, which claim had arisen as of the

Petition Date, need not file a proof of claim on or before the General Bar Date. In contrast, claims held by former employees (whether or not retired or previously covered by a collective bargaining agreement) and current bargaining unit employees (i.e., union-represented employees) are *not* excluded and, thus, are subject to the General Bar Date; *provided, however*, a current bargaining unit employee, a former employee or a labor union claiming to represent or representing a current bargaining unit employee or former employee shall not be required to file a proof of claim for current benefits concerning (a) any benefit plan which is funded through a trust fund held separate from the assets of the Debtors, such as a qualified retirement or 401(k) plan, or (b) a self funded benefit program of the Debtors which provides welfare benefits under one or more “employee welfare benefit plans” as defined in section 3(1) of ERISA, 29 U.S.C. § 1002(1). Subject to the proviso of the preceding sentence, claims of labor unions, as well as claims of bargaining unit employees (and former employees represented by labor unions), arising out of, or related to, current or previous collective bargaining agreements, are not excluded and, thus, are subject to the General Bar Date.

12. Any person or entity that holds a claim that arises from the rejection of an executory contract or unexpired lease must file a proof of claim based on such rejection by the later of (a) the applicable Bar Date and (b) 30 days after notice by the Debtors of the entry of an order authorizing rejection to which the claim relates.

13. Any person or entity that holds a claim that arises from the withdrawal by the Debtors from a multi-employer pension plan must file a proof of claim based on such withdrawal by the later of (a) the applicable Bar Date and (b) 30 days after notice by the Debtors that permanently terminates their obligation to contribute under such multi-employer plan, *provided* that notice of the entry of an order authorizing such withdrawal shall satisfy this requirement.

14. Any entity asserting a setoff right in its proof of claim shall be entitled to exercise such setoff unless and until the Debtors file an objection with respect to such setoff prior to the expiration of the relevant deadline for the Debtors to file any such an objection.

15. The Debtors shall retain the right to: (a) dispute, or assert offsets or defenses against, any filed proof of claim or any claim listed or reflected in the Schedules as to nature, amount, liability, classification or otherwise; (b) subsequently designate any scheduled claim as disputed, contingent or unliquidated; and (c) otherwise amend or supplement the Schedules. If the Debtors amend or supplement their Schedules after the service of the Bar Date Notice Package, the Debtors shall give notice of any such amendment or supplement to the holders of claims affected thereby, including notice of the Amended Schedules Bar Date to file proofs of claim in response to the amendment or supplement to the Schedules. In particular, if the Debtors amend or supplement its Schedules to reduce the undisputed, noncontingent and liquidated amount, to change the nature or classification of a claim against the Debtors or to add a new claim to the Schedules, the affected claimant is required to file a proof of claim or amend any previously filed proof of claim in respect of the amended scheduled claim accordance with the procedures described herein by the Amended Schedule Bar Date. The Amended Schedule Bar Date shall be the later of (a) the General Bar Date and (b) 20 days after the date that notice of the applicable amendment to the Schedules is served on the claimant. Notwithstanding the foregoing, nothing contained herein shall preclude the Debtors from objecting to any claim, whether scheduled or filed, on any grounds.

16. Pursuant to Bankruptcy Rule 3003(c)(2), any holder of a claim against or interest in one or more of the Debtors who is required, but fails, to timely file a proof of such claim or interest in appropriate form in accordance with the terms of the Bar Date Order shall be forever barred, estopped and enjoined from asserting such claim against or interest in the Debtors (or filing a proof of claim or interest with respect thereto), and the Debtors and their successors and their respective property shall be forever discharged from any and all indebtedness or liability with respect to such claim or interest, and such holder shall not be permitted to vote to accept or reject any plan of reorganization filed in these Chapter 11 Cases or participate in any distribution in the Debtors' Chapter 11 Cases on account of such claim or interest or to receive further notices regarding such claim or interest.



17. The Debtors, through BMC Group or otherwise, shall serve (i) a copy of this Order, (ii) the Bar Date Notice and (iii) a Proof of Claim Form (the “**Bar Date Notice Package**”) by first class mail, postage prepaid, within five (5) business days of the entry of this Order, upon

- (a) the United States Trustee;
- (b) counsel to the Committee;
- (c) all persons or entities that have requested notice of the proceedings in the Chapter 11 Cases;
- (d) all persons or entities that have filed claims or interests;
- (e) all known holders of prepetition claims or interests listed on the Schedules at the addresses stated therein;
- (f) all counterparties to the Debtors’ executory contracts and unexpired leases listed on the Schedules at the addresses stated therein;
- (g) pension plans to which the Debtors contribute or have contributed on behalf of their employees;
- (h) all parties to litigation with the Debtors;
- (i) the Internal Revenue Service, the Securities and Exchange Commission, the Pension Benefit Guaranty Corporation, the United States Attorney for this District and any other required governmental units;
- (j) the parties requesting notice in the Chapter 11 Cases under Bankruptcy Rule 2002; and
- (k) such additional persons and entities as deemed appropriate by the Debtors.

18. As part of the Bar Date Package, the Debtors shall mail one or more Proof of Claim Forms (as appropriate) to the parties receiving the Bar Date Notice. For holders of potential claims listed in the Schedules, the Proof of Claim Form mailed to such entities shall indicate how the Debtors have scheduled the creditor’s claim in the Schedules, including: (a) the amount of the claim, if any; (b) whether the claim is listed as disputed, contingent or unliquidated; and (c) whether the claim is listed as a secured, unsecured priority or unsecured non-priority claim.

19. The Debtors shall publish the Publication Notice at least once no later than 21 days prior to the General Bar Date in the national edition of *The Wall Street Journal*.

20. Upon the advance express written consent of the Debtors, a claimant's proof of claim may be filed without the documents required by Bankruptcy Rules 3001(c) and 3001(d); *provided, however*, that any claimant that receives such a written consent shall be required to transmit these documents in support of its claim to BMC Group, the Debtors or other parties in interest within ten days after the date of a written request for such documents.

21. The Debtors and BMC Group are authorized and empowered to take such steps and perform such acts as may be necessary to implement and effectuate the terms of this Order.

22. The entry of this Order is without prejudice to the right of the Debtors to seek a further order of this Court fixing a date by which holders of claims or interests not subject to the General Bar Date established herein must file such proofs of claim or interest or be barred from doing so.

23. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: February \_\_, 2012  
Wilmington, Delaware

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HONORABLE KEVIN GROSS  
UNITED STATES BANKRUPTCY JUDGE