

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

In re:

COACH AM GROUP HOLDINGS CORP.,
*et al.*¹

Debtors.

Chapter 11

Case No. 12-10010 (KG)

(Jointly Administered)

Re: Docket No. 186

**MOTION OF DEBTORS FOR AN ORDER UNDER 11 U.S.C. §§ 102 AND 105,
BANKRUPTCY RULE 9006(c) AND LOCAL RULE 9006-1(e) TO SHORTEN
NOTICE WITH RESPECT TO THE MOTION OF THE DEBTORS FOR
ENTRY OF AN 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**

The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), by and through their counsel, submit this motion (the “**Motion to Shorten**”), for entry of an order pursuant to sections 102 and 105 of Title 11 of the United States Code (the

¹ 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.

“**Bankruptcy Code**”), Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 9006-1(e) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), providing that the notice period for the *Motion of the Debtors for Entry of an 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* (the “**Bar Date Motion**”) be shortened as permitted by Local Rule 9006-1(e) to permit a hearing on the Bar Date Motion on February 13, 2012 at 10:00 a.m. (ET). In support of the Motion to Shorten, the Debtors respectfully represent as follows:

1. In accordance with Local Rule 9006-1, the Debtors would generally be required to provide at least twenty-one (21) days’ notice, provided service was by overnight delivery, of the Bar Date Motion to the necessary parties specified in Local Rule 2002-1(b). However, Local Rule 9006-1(e) provides that the Court may shorten this notice period upon a motion that sets forth the exigencies that justify the shortened notice. *See* Del. Bankr. L.R. 9006-1(e); *see also* Fed. R. Bankr. P. 9006(c)(1) (permitting court to shorten notice “for cause shown”). For the reasons set forth below, the Debtors believe that the shortened notice requested by this Motion to Shorten is appropriate and justified under the circumstances.

2. Cause exists to shorten the time for the notice of the Bar Date Motion. As detailed in the Bar Date Motion, the Debtors seek to establish deadlines for the filing of proofs of claim in these cases. Shortened notice is appropriate under the circumstances because the Debtors must obtain complete and accurate information regarding the nature, validity and amount of all claims that will be asserted in the Chapter 11 Cases prior to any auction or hearing in connection with the Debtors’ proposed sale of substantially all of their assets.

3. The shortened notice requested herein will not unduly prejudice any party in interest. The Debtors believe that in light of the circumstances, other interested parties will receive sufficient notice and have time to object, if necessary, to the relief requested in the Bar Date Motion.

4. The Debtors submit that, for the foregoing reasons, cause exists to shorten the notice period pursuant to Bankruptcy Rule 9006(c) and Local Rule 9006-1(e).

5. The Debtors respectfully request that the hearing on this matter be scheduled for the omnibus hearing on February 13, 2012 at 10:00 a.m. (ET), with a corresponding objection deadline of February 9, 2012 at 11:00 a.m. (ET).

WHEREFORE, for the foregoing reasons, the Debtors respectfully request that the Court enter an order (i) scheduling a hearing with respect to the Bar Date Motion on February 13, 2012 at 10:00 a.m. (ET), (ii) scheduling the objection deadline for February 9, 2012 at 11:00 a.m. (ET), and (iii) granting such other and further relief as is just and proper.

Respectfully submitted,

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Dated: February 1, 2012
Wilmington, Delaware