

**IN THE 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)

(Joint Administration Requested)

**NOTICE OF FILING OF BANKRUPTCY PETITIONS
AND FIRST DAY PLEADINGS AND NOTICE OF FIRST DAY HEARING**

PLEASE TAKE NOTICE that on January 3, 2012, Coach Am Group Holdings Corp. and its affiliated debtors and debtors in possession (collectively, the “**Debtors**”) filed voluntary petitions for relief under chapter 11 of Title 11 of the United States Code.

PLEASE TAKE FURTHER NOTICE that in connection with the filing of their petitions, the Debtors filed the following motions and applications (collectively, the “**First Day Pleadings**”):

1. First Day Declaration in Support of Chapter 11 Filing and First Day Pleadings [Docket No. 3; Filed 01/03/2012]

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. (1360); 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 (1244); 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.

2. Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. § 105(a), Fed. R. Bankr. P. 1015 and Del. Bankr. L.R. 1015-1 Approving Joint Administration of Cases and Granting Related Relief [Docket No. 2; Filed 01/03/2012]
3. Application of the Debtors for Entry of an Order Pursuant to 28 U.S.C. § 156(c), 11 U.S.C. § 503(b), Fed. R. Bankr. P. 2002(f) and 6003 and Del. Bankr. L.R. 2002-1(F) Authorizing the Employment and Retention of BMC Group, Inc. as Notice, Claims and Balloting Agent for the Debtors and Authorizing the Appointment of BMC Group, Inc. as Notice, Claims and Balloting Agent to the Office of the Clerk of the Court [Docket No. 4; Filed 01/03/2012]
4. Motion of the Debtors for Entry of an Order Pursuant to Fed. R. Bankr. P. 1007(b) and (c) and Del. Bankr. L.R. 1007-1(b) Extending the Time Within Which the Debtors Must File Their Schedules and Statements of Financial Affairs [Docket No. 5; Filed 01/03/2012]
5. Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. §§ 105(a), 345(a) and 363(c)(1), Fed. R. Bankr. P. 6003 and 6004 and Local Rule 2015(2) (I) Approving Continued Use of Cash Management System, (II) Authorizing Use of Prepetition Bank Accounts and Existing Checks, and (III) Granting an Interim Waiver of the Requirements Under 11 U.S.C. § 345(b) [Docket No. 6; Filed 01/03/2012]
6. Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. §§ 105(a), 363(b) and 507(a) (I) Authorizing, But Not Directing, the Debtors to Pay Prepetition Wages, Salaries, and Other Compensation and Benefits, (II) Authorizing, But Not Directing, the Debtors to Continue Employee Benefits Programs and Payment of Related Administrative Obligations and (III) Directing Applicable Banks and Other Financial Institutions to Receive, Process, Honor, and Pay All Checks Presented for Payment and to Honor All Fund Transfer Requests [Docket No. 7; Filed 01/03/2012]
7. Motion of the Debtors for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 366 (I) Prohibiting Utility Providers From Discontinuing, Altering or Refusing Service on Account of Prepetition Invoices, (II) Deeming Utility Providers to Have Adequate Assurance of Future Payment, and (III) Establishing Procedures for Resolving Requests for Additional Assurance [Docket No. 8; Filed 01/03/2012]
8. Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. §§ 105(a), 363(b) and 507(a)(8) (I) Authorizing the Debtors to Pay the Prepetition Claims of Certain Taxing and Regulatory Authorities, (II) Authorizing Banks and Financial Institutions to Honor and Process All Checks and Wire Transfers Related Thereto, and (III) Granting Related Relief [Docket No. 9; Filed 01/03/2012]

9. Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. §§ 105(a), 362(d), 363(b), 364(c)(2) and 503(b) (I) Authorizing, But Not Directing, the Debtors to (A) Continue Prepetition Insurance Coverage and Pay All Related Premiums and Obligations Thereunder and (B) Maintain Prepetition Premium Financing Agreements and Pay All Obligations Thereunder, (II) Modifying the Automatic Stay With Respect to Workers' Compensation Claims, and (III) Authorizing and Directing Financial Institutions to Honor Related Checks and Electronic Payment Requests [Docket No. 10; Filed 01/03/2012]
10. Motion of the Debtors for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 363(c) (I) Authorizing the Debtors to Pay and Honor Prepetition Obligations to Customers and to Otherwise Continue Customer Programs and Practices in the Ordinary Course of Business, and (II) Authorizing and Directing the Disbursement Banks to Honor and Process Related Checks and Transfers [Docket No. 11; Filed 01/03/2012]
11. Motion of the Debtors for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a), 363, 364, 1107, and 1108 (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors and (II) Scheduling a Final Hearing [Docket No. 12; Filed 01/03/2012]
12. Motion of the Debtors for Entry of Order (I) Pursuant to 11 U.S.C. §§ 105(a) and 365(a) Approving Assumption of Interline Agreements and Clearinghouse Participation Agreement and (II) Pursuant to 11 U.S.C. § 362 Modifying the Automatic Stay to the Extent Necessary to Effectuate the Requested Relief [Docket No. 13; Filed 01/03/2012]
13. Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. §§ 105(A), 362, 363, and 553 (I) Authorizing, But Not Directing, Fuel Supply Parties to Apply Prepetition Prepayments and Credits to Prepetition and Post-Petition Obligations Under Fuel Supply Arrangements, (II) Authorizing, But Not Directing, Debtors to Pay Prepetition Amounts Owed to Fuel Supply Parties, (III) Authorizing, But Not Directing, Debtors to Honor, Perform, and Exercise Their Rights and Obligations Under Fuel Supply Arrangements, and (IV) Authorizing and Directing Financial Institutions to Honor and Process Related Checks and Transfers [Docket No. 14; Filed 01/03/2012]
14. Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. § 365(a) and Fed. R. Bankr. P. 6006 Approving Assumption of Certain Executory Credit Card and Payment Agreements [Docket No. 16 Filed 01/03/2012]
15. Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. §§ 363(b) and 105(a) (I) Authorizing Debtors to Pay Prepetition Obligations Owed to Foreign Creditors, (II) Authorizing and Directing Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Scheduling Final Hearing [Docket No. 17; Filed 01/03/2012]

16. Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. § 364 Authorizing Debtors to Continue Corporate Credit Card Programs [Docket No. 18; Filed 01/03/2012]
17. Motion of the Debtors for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a), 363(b), 1107(a) and 1108 (A) Authorizing Debtors to Pay or Honor Prepetition Obligations to Certain Common Carriers and Other Subcontractors and (B) Authorizing and Directing Financial Institutions to Honor All Related Check and Electronic Payment Requests [Docket No. 19; Filed 01/03/2012]
18. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Post-Petition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 364(c)(1), 364(c)(2), 364(d)(1), and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363; (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363 and 364; and (III) Scheduling Final Hearing [Docket No. 20; Filed 01/03/2012]

PLEASE TAKE FURTHER NOTICE that a hearing on the First Day Pleadings has been scheduled for **January 5, 2012 at 10:00 a.m.** (ET) before The Honorable Kevin Gross at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801.

Respectfully submitted,

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*Proposed Counsel to the Debtors and
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Dated: January 3, 2012
Wilmington, Delaware