

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	:
	:
COACH AM GROUP HOLDINGS	: Chapter 11
CORP., et al.	:
Debtor(s)	: Case No. 12-10010 (KG)
	:
ROBERTO RIVERA III	:
	:
Movant	:
vs.	:
	: Hearing Date: May 15, 2012 @ 2:00 p.m.
CUSA EE, LLC	: Objection Date: May 8, 2012
	:
Respondent,	:

MOTION FOR RELIEF FROM THE AUTOMATIC STAY

COMES NOW, Roberto Rivera III, Movant, (hereinafter "Movant") by and through his undersigned counsel, hereby moves this court (the "Motion") for entry of an order for the appropriate relief from the automatic stay pursuant to section 362(d) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 4001(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). In support of his Motion, he respectfully states as follows:

1. Debtor, CUSA EE, LLC filed for relief pursuant to chapter 11 of the Bankruptcy Code on or about January 3, 2012 filed as Case No. 12-10053 (KG).
2. Debtor CUSA EE, LLC's case was consolidated with Debtor COACH AM GROUP HOLDINGS, CORP. in Case No. 12-10010 (KG) on January 5, 2012.
3. The Court has jurisdiction over this matter pursuant to USC Sec. 1334. This is a core proceeding pursuant to 28 USC Sec. 157. This is an action under Sec. 362 of the Code for relief of the automatic stay arising from the filing of the chapter 11 petition.

4. Movant asserts that a civil litigation claim was filed March 22, 2011 in the State of Texas in Cameron County Court at Law No. 3 as Cause No. 2011-CCL-00318 styled ROBERTO RIVERA III vs. HIGHWAY TRAVEL CENTERS, INC. d/b/a ROADRUNNER TRAVEL CENTER, EL EXPRESO BUS COMPANY, and VICTOR MANUEL GUAJARDO.
5. Movant requests relief from the automatic stay pursuant to 11 U.S.C. §362 to prosecute his suit in the civil litigation against Defendant CUSA EE, LLC d/b/a El Expreso Bus Company, an affiliate of Debtor.

WHEREFORE, Movant requests that this court enter an order granting relief from automatic stay in order to permit Movant to prosecute his suit in the civil litigation, and to grant him any such further and other relief at law or under equity to which he may be justly entitled to receive.

Dated: March 29, 2012

Respectfully submitted,

/S/Antonio Villeda
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