

**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)
<i>et al.</i> ,	)	
	)	(Jointly Administered)
Debtors.	)	
	)	<b>Hearing Date: April 23, 2012 at 11:00 a.m.</b>
	)	<b>Objection Deadline: April 16, 2012 at 4:00 p.m.</b>

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that on April 2, 2012, Union Pacific Railroad Company, by and through its undersigned counsel, filed the *Motion of Union Pacific Railroad Company for Relief from the Automatic Stay* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”).

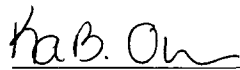
**PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court has scheduled a hearing on the Motion for **April 23, 2012 at 11:00 a.m. (ET)** before The Honorable Kevin Gross, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6<sup>th</sup> Floor, Courtroom #3, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of Practice and Procedure for the United States Bankruptcy Court for the District of Delaware, filed with the Bankruptcy Court, and served upon, so as to be received by, the undersigned counsel on or before **April 16, 2012 at 4:00 p.m. (ET)**. Only properly and timely filed responses will be considered.

**IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: April 2, 2012  
Wilmington, Delaware

**ASHBY & GEDDES, P.A.**



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Gregory A. Taylor (I.D. #4008)  
Karen B. Skomorucha Owens (I.D. #4759)  
500 Delaware Avenue, 8<sup>th</sup> Floor  
P.O. Box 1150  
Wilmington, DE 19899-1150  
Telephone: (302) 654-1888  
Facsimile: (302) 654-2067  
Email: gtaylor@ashby-geddes.com  
kowens@ashby-geddes.com

*Counsel to Union Pacific Railroad Company*