IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
COACH AM GROUP HOLDINGS CORP., *et al.*,[1]	Case No. 12-10010 (KG)
Debtors.	(Jointly Administered)
	RE: Docket No. 401

DEBTORS OBJECTION TO LETTER FILED BY MICHAEL YUSIM SEEKING WITHDRAWAL OF JOYNER ADMINISTRATIVE LAW PROCEEDING

The above-captioned debtors and debtors in possession (collectively, the "**Debtors**"), by and through their undersigned counsel, hereby object (the "**Objection**") to the letter dated February 23, 2012 (the "**Letter**") filed by non-attorney Michael Yusim ("**Yusim**")[2] on behalf of Zachary Joyner ("**Joyner**") requesting that the Court withdraw a certain

[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.

[2] Upon information and belief, Yusim is a former bus driver employee of the Debtors and is not admitted to practice law as an attorney in any jurisdiction.

administrative law proceeding against Debtor Midnight Sun Tours, Inc. (the "**Administrative Law Proceeding**"). In support of this Objection, the Debtors respectfully state as follows:

BACKGROUND

1. On January 3, 2012 (the "**Petition Date**"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (collectively, the "**Chapter 11 Cases**").

2. The Debtors continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases.

3. By order dated January 5, 2012, this Court has authorized the joint administration of the Chapter 11 Cases. *See* Docket No. 44.

4. On January 13, 2012, the Office of the United States Trustee appointed an official committee of unsecured creditors (the "**Committee**") pursuant to section 1102(a)(1) of the Bankruptcy Code. *See* Docket No. 92.

5. Detailed information regarding the Debtors' business and the events leading to the Chapter 11 Cases is set forth in the *Declaration in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 3] (the "**First Day Declaration**").

6. On or about January 16, 2012, Yusim filed a letter seeking stay relief for Joyner to continue prosecution of the Administrative Law Proceeding before an Administrative Law Judge [Docket No. 203] (the "**Stay Relief Letter**"). By Order dated March 29, 2012, the Court denied the relief requested in the Stay Relief Letter [Docket No. 511].

OBJECTION

7. At the outset, the Debtors note that the Letter has been docketed as a motion to dismiss the Chapter 11 Cases. The Debtors respectfully submit that the Letter was improperly docketed as nowhere in the Letter does Yusim request dismissal of the Chapter 11 Cases.

8. Rather, by the Letter Yusim requests that the Administrative Action be withdrawn and returned to the Department of Labor. This request should be denied as the Administrative Law Proceeding is not pending before this Court and is currently stayed pursuant to section 362 of the Bankruptcy Code.

WHEREFORE, the Debtors respectfully request that the Court deny the relief requested in the Letter, and grant the Debtors such other and further relief as may be just and proper.

Respectfully submitted,

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-and –

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Dated: April 13, 2012
Wilmington, Delaware