UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:	:	CHAPTER 11
	:	
COACH AM GROUP HOLDINGS CORP., *et al.*,	:	CASE NO. 12-10010-KG
	:	
	:	(Jointly Administered)
Debtors.	:	

JOINDER OF NATIONAL PASSENGER RAILROAD CORPORATION ("AMTRAK") TO: (I) THE OBJECTION OF BNSF RAILWAY COMPANY TO DEBTORS' MOTION TO EXTEND THE AUTOMATIC STAY TO THE DEBTORS' DRIVERS TO PREVENT THE THREATENED FILING AND/OR PROSECUTION OF PERSONAL INJURY TO OTHER TORT ACTIONS (DKT. 406) (THE "OBJECTION") AND (II) THE LIMITED CONSOLIDATED OBJECTION OF BNSF RAILWAY COMPANY TO MOTIONS FOR RELIEF FROM THE AUTOMATIC STAY IN ACCORDANCE WITH 11 U.S.C. SECTION 362(d) (DKT. 272) AND THE SECOND LIMITED CONSOLIDATED OBJECTION OF BNSF RAILWAY COMPANY TO MOTIONS FOR RELIEF FROM THE AUTOMATIC STAY IN ACCORDANCE WITH 11 U.S.C. SECTION 362(d) (DKT. 400) (TOGETHER, THE "LIMITED CONSOLIDATED OBJECTION")

The National Railroad Passenger Corporation ("Amtrak"), by counsel, respectfully represents:

1. Amtrak is a non-debtor counterparty to certain Service Agreements, Thruway Bus Service Contracts, Transportation Services Agreements and/or similar agreement and contracts (collectively, the "Agreements"), including, but not limited to, the following:

   a. Service Agreement - Contract Date 05/15/2010, Raleigh NC / America Charters, Ltd. (Case No. 12-10021; Schedule G - Schedules of Assets and Liabilities);

   b. Service Agreement - Contract Date 04/06/2010, Corporate / American Coach Lines of Jacksonville, Inc. (Case No. 12-10023; Schedule G - Schedules of Assets and Liabilities);

   c. Thruway Bus Service - Contract Date 11/6/2006, Philadelphia / CUSA AWC, LLC. (Case No. 12-10048; Schedule G - Schedules of Assets and Liabilities);

d. Transportation Services Agreement, 08/01/2011 CUSA CSS, LLC (Case No. 12-10052; Schedule G - Schedules of Assets and Liabilities;

e. Transportation Services Agreement, 08/01/2011 CUSA ELKO, LLC (Case No. 12-10054; Schedule G - Schedules of Assets and Liabilities); and

f. Transportation Services Agreement, 08/01/2011 CUSA ES, LLC (Case No. 12-10055; Schedule G - Schedules of Assets and Liabilities).

2. Amtrak has been identified by Debtor, CUSA CC, LLC in its Schedule F - Schedules of Assets and Liabilities (Case No. 12-10051) as the holder of an "Unsecured Nonpriority Claim / Nick Troiano Philadelphia / Indemnification."

3. Amtrak and certain Debtors have been named as co-defendants in personal injury actions (the "Actions") filed in various federal and state courts, including, but not limited to:

a. Case No. BC 456 891, Superior Court of the State of California for the County of Los Angeles, (the "Ramstad Action"); and

b. Case. No. RG 12617974, Superior Court of the State of California for the County of Alameda (the "Van Renselaar Action").

4. In each Action, the Debtors have insurance policies with the primary risk underwritten by National Union Fire Insurance Company of Pittsburgh, PA ("NUFICO"). Chartis Claims, Inc. is the claims' administrator for NUFICO.

5. Amtrak has tendered the defense of the Ramstad Action to NUFICO under a certain Business Auto Insurance Policy No. 978-86-79. A brief summary of such Action, tender and Policy is attached hereto and incorporated herein as Exhibit A. As reported in Exhibit A, (i) Amtrak is an additional named insured under the Policy, and (ii) NUFICO is obligated to provide Amtrak a defense, as well as indemnity, for claims covered by the Policy.

6. Amtrak was not informed of the Van Renselaar Action until on or about April 6, 2012; Amtrak expects to tender the defense of the Van Renselaar Action to NUFICO under a Business Auto Insurance Policy similar to that applicable to the Ramstad Action.

7. In accordance with this Court's Order dated February 10, 2012 (DKT. 213), Amtrak timely filed the following Proofs of Claim:

Claim No.	**Case Name**	**Date**
1828	CUSA ES, LLC 12-10055	4/2/2012
1827	CUSA ELKO, LLC 12-10054	4/2/2012
1826	CUSA CSS, LLC 12-10052	4/2/2012
1825	CUSA CC, LLC 12-10051	4/2/2012
1824	CUSA AWC, LLC 12-10048	4/2/2012
1823	American Coach Lines of Jacksonville, Inc. 12-10023	4/2/2012
1822	American Charters, Ltd. 12-10021	4/2/2012
1821	Coach Am Group Holdings Corp. 12-10010	4/2/2012

8. As a result of the Ramstad and Van Renselaar Actions, Amtrak finds itself in a similar position – vis-à-vis the Debtors, NUFICO, and the plaintiffs in the Ramstad and Van Renselaar Actions – as BNSF Railway Company ("BNSF") and Union Pacific Railroad Company ("UP") are with the Debtors, NUFICO, and the plaintiffs who have filed actions to recover damages for wrongful death and bodily injuries against BNSF and UP.

9. Accordingly, for the reasons set forth in the Objection and the Limited Consolidated Objection, Amtrak joins in the Objection and the Limited Consolidated Objection,

and reserves all of its rights, including the right to participate at the hearing currently scheduled to commence on April 23, 2012, or any adjournments thereof.

Respectfully submitted,

Dated: April 16, 2012

DILWORTH PAXSON LLP

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