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September 19, 2024

Cynthia Brown
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

ENTERED
Office of Proceedings
September 19, 2024
Part of
Public Record

Re: Avalon Motor Coaches, LLC
Avalon Transportation, LLC
– Acquisition of Control –
Kerrville Bus Company, Inc.
All West Coachlines, Inc.
American Coach Lines of Atlanta, Inc.
Coach Leasing, Inc.
Coach USA, Inc.
Coach USA Administration, Inc.

Docket MCF 21120

To Whom it May Concern:

This filing is submitted in connection with the Request for Interim Approval and Application for Approval submitted to the Surface Transportation Board (STB) by Avalon Motor Coaches, LLC and Avalon Transportation LLC, related to their acquisition of the assets of certain subsidiaries of Coach USA, Inc., submitted on August 12, 2024. Please find enclosed a Supplement to Prior Filing to join Virgin-Fish, Inc. and Jeffrey Brush to the Application as requested by the STB in its August 30, 2024 decision granting interim management and operating authority.

Respectfully submitted,

A handwritten signature in black ink that reads "Barry M. Weisz".

Barry M. Weisz
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P: 310 282 9448
Attorney for Avalon Motor Coaches, LLC and Avalon
Transportation LLC

AVALON MOTOR COACHES, LLC
AVALON TRANSPORTATION, LLC

-- ACQUISITION OF CONTROL --

KERRVILLE BUS COMPANY, INC.
ALL WEST COACHLINES, INC.
AMERICAN COACH LINES OF ATLANTA, INC.
COACH LEASING, INC.
CAM LEASING, LLC
COACH USA, INC.
COACH USA ADMINISTRATION, INC.

Docket No. MCF 21120

September 19, 2024

Pursuant to the directives provided in the Decision issued by the Surface Transportation Board on August 30, 2024 granting interim operating approval to the Applicants, the Applicants submit this filing to join Virgin-Fish, Inc. (“Virgin Fish”) and Jeffrey Brush to the application submitted on August 12, 2024 (the “Application”) and to amend the Application to remove references to the Lenzner transaction. All capitalized terms used herein but not defined shall have the meanings given to them in the Application.

1. Supplement to Section 1 of the Application.

The full names and addresses of Virgin-Fish and Jeffrey Brush are as follows and the authorized signature of each is attached in the enclosed verification statement:

Virgin-Fish, Inc.

1000 Corporate Point
Culver City, California 90230

Signatory: Jeffrey Brush

Jeffrey Brush

1000 Corporate Point
Culver City, California 90230

Signatory: Jeffrey Brush

2. Supplement to Section 2 of the Application.

Neither Virgin-Fish nor Jeffrey Brush is a motor carrier or holds any operating authorities.

3. Verification

A new verification statement is attached as Exhibit A hereto.

4. Incorporation of Remaining Terms of Application

The definition of "Avalon" as used in the Application is amended to include Virgin-Fish and Jeffrey Brush. All other sections of the Application are incorporated by reference without need for modification except as set forth herein.

5. Amendment to Remove Reference to the Coach Lenzner Subsidiaries.

Section 4 of the Application and all references to any of the Coach Lenzner Subsidiaries are deleted from the Application. No Avalon entity or applicant will be purchasing any Coach Lenzner Subsidiary or any assets of Lenzner.

Exhibit A

VERIFICATION

I, Jeffrey Brush, individually and as Manager or President of applicants Avalon Motor Coaches, LLC, Avalon Transportation, LLC, and Virgin-Fish, Inc. verify under penalty of perjury, under the laws of the United States of America, that all information supplied in connection with this application is true and correct. Further, I certify that I am qualified and authorized to file this application or pleading. I know that willful misstatements or omissions of material facts constitute Federal criminal violations punishable under §18 U.S.C. 1001 by imprisonment up to five years and fines up to \$10,000 for each offense. Additionally, these misstatements are punishable as perjury under §18 U.S.C. 1621, which provides for fines up to \$2,000 or imprisonment up to five years for each offense.

By: /s/ Jeffrey Brush
Name: Jeffrey Brush
Title: Manager/President of Avalon Motor
Coaches, LLC, Avalon Transportation, LLC,
and Virgin-Fish, Inc.

/s/ Jeffrey Brush
Jeffrey Brush