

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

---

In re:	)	
	)	Chapter 11
ALLIED SYSTEMS HOLDINGS, <i>et al.</i> ,	)	
	)	Case No. 12-11564 (CSS)
Debtors.	)	Jointly Administered
	)	
	)	<b>Hearing Date: May 31, 2013 at 10:00 a.m. (ET)</b>
	)	
	)	<b>Objection Deadline: May 29, 2013 at 12:00 noon (ET)</b>
	)	
	)	Ref. D.I. 1174
	)	
	)	

---

**OBJECTION AND RESERVATION OF RIGHTS OF THE TEAMSTERS NATIONAL  
AUTOMOBILE TRANSPORTERS INDUSTRY NEGOTIATING COMMITTEE  
("TNATINC") TO DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§ 105, 361, 362,  
363(c), 364 (c)(1), 364 (c)(2), 364(c)(3), 364(d)(1), 364(e), 503(b), and 507(a) FED. R. BANK  
P. 2002, 4001 AND 9014 AND DEL. BANKR. L.R. 4001-2; (I) AUTHORIZING DEBTORS  
TO; (A) OBTAIN POSTPETITION SECURED REPLACEMENTS DIP FINANCING  
AND (B) USE CASH COLLATERAL; (II) GRANTING SUPERPRIORITY LIENS AND  
PROVIDING FOR SUPERPRIORITY ADMINISTRATIVE EXPENSE STATUS;(III)  
GRANTING ADEQUATE PROTECTION TO PREPETITION SECURED LENDERS;  
(IV) MODIFYING AUTOMATIC STAY; AND (V) SCHEDULING A FINAL HEARING  
PURSUANT TO BANKRUPTCY RULES 4001(b) AND (c)**

The Teamsters National Automobile Transporters Industry Negotiating  
Committee ("TNATINC"), a creditor, party in interest, and the national negotiating committee  
of approximately 31 local unions affiliated with the International Brotherhood of Teamsters  
("IBT") which are the exclusive collective bargaining representatives of over 1000 bargaining  
unit employees of the Debtors<sup>1</sup> pursuant to collective bargaining agreements ("CBAs") with the  
Debtors, hereby objects to the Motion ("**Motion**") of the Debtors (the "**Debtors**" or the  
"**Company**") pursuant to 11 U.S.C. §§ 105, 361, 362, 363(c), 364 (c)(1), 364 (c)(2), 364(c)(3),

---

<sup>1</sup> These employees work in various classifications of drivers, yard employees and mechanics.

364(d)(1), 364(e), 503(b), and 507(a), Fed. R. Bank P. 2002, 4001 and 9014 and Del. Bankr. L.R. 4001-2:(i) authorizing Debtors to: (a) obtain postpetition secured replacements DIP financing and (b) use cash collateral; (ii) granting superpriority liens and providing for superpriority administrative expense status; (iii) granting adequate protection to prepetition secured lenders; (iv) modifying automatic stay; and (v) scheduling a final hearing pursuant to Bankruptcy Rules 4001(b) and (c) (Docket No. 1174):

1. The TNATINC objects to the Motion and reserves its rights for the same reasons raised in the Omnibus Objection to the DIP and Bid Procedures Motion filed or to be filed by the Official Committee of Unsecured Creditors, which is incorporated as if fully set out and stated herein.<sup>2</sup>

### **CONCLUSION**

For the foregoing reasons, the Court should grant relief consistent with this Objection and Reservation of Rights.

Dated: May 29, 2013

Respectfully submitted,

/s/ Susan E. Kaufman  
Susan E. Kaufman (DSB#3381)  
COOCH AND TAYLOR, P.A.  
1000 West Street, 10<sup>th</sup> Floor  
The Brandywine Building  
Wilmington, DE 19899  
(302) 984-3893 / (302) 984-3939 Fax  
Skaufman@coochtaylor.com

and

---

<sup>2</sup> The TNATINC is a member of the Creditors Committee but submits this Objection and Reservation of Rights on its own behalf.

Richard M. Seltzer, Esq.  
COHEN, WEISS AND SIMON LLP  
330 West 42<sup>nd</sup> Street  
New York, NY 10036  
(212) 563-4100 / (646) 473-8230 Fax  
rseltzer@cwsny.com

Counsel for TNATINC