

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

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In re: : Chapter 11
:
ADVANTA CORP., *et al.*,¹ : Case No. 09-13931 (KJC)
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Debtors. : (Jointly Administered)
:
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Advanta Bank Corp., :
Plaintiff, :
v. : Adv. Proc. No. 10-50795 (KJC)
Advanta Corp., :
Defendant. :
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**EMERGENCY MOTION OF PLAINTIFF ADVANTA BANK CORP.
FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY
INJUNCTIVE RELIEF AGAINST DEFENDANT ADVANTA CORP.**

¹ The Debtors in these jointly administered chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Advanta Corp. (2070), Advanta Investment Corp. (5627), Advanta Business Services Holding Corp. (4047), Advanta Business Services Corp. (3786), Advanta Shared Services Corp. (7074), Advanta Service Corp. (5625), Advanta Advertising Inc. (0186), Advantennis Corp. (2355), Advanta Mortgage Holding Company (5221), Advanta Auto Finance Corporation (6077), Advanta Mortgage Corp. USA (2654), Advanta Finance Corp. (8991), Advanta Ventures Inc. (5127), BizEquity Corp. (8960), Ideablob Corp. (0726), Advanta Credit Card Receivables Corp. (7955), Great Expectations International Inc. (0440), Great Expectations Franchise Corp. (3326), and Great Expectations Management Corp. (3328). Each of the Debtors (other than Advanta Credit Card Receivables Corp. and the Great Expectations entities) maintains its principal corporate office at Welsh &McKean Roads, P.O. Box 844, Spring House, Pennsylvania 19477-0844. Advanta Credit Card Receivables Corp. maintains its principal corporate office at 2215 B. Renaissance Drive, Suite 5, Las Vegas, Nevada 89119, and the Great Expectations entities maintain their principal corporate office at 1209 Orange Street, Wilmington, Delaware 19801. In accordance with an order of this Court, the Debtors' cases are being jointly administered pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules ").

Advanta Bank Corp. (“ABC”), Plaintiff herein, by and through its undersigned attorneys, hereby moves (“Motion”) the Court for the issuance of a temporary restraining order and preliminary injunctive relief against Defendant Advanta Corp., requiring it to either timely secure an extension from the IRS to file its 2009 Tax Return; or, alternatively, if Defendant chooses to file its 2009 Tax Return by this coming Monday, March 15, to affirmatively elect to carry back 2009 consolidated net operating losses five years. The grounds for this Motion are more fully set forth in (i) the Complaint initiating this adversary action; and (ii) the Emergency Motion of Advanta Bank Corp. for Entry of An Order Compelling Debtor Advanta Corp.to (I) Timely File A Request For an Extension of Time to File 2009 Consolidated Federal Income Tax Return; Or, In The Alternative, (II) Elect to Carry Back Consolidated Net Operating Losses Five

Years [D.I. 323], both of which are incorporated by reference as if fully set forth at length herein.

Dated: March 14, 2010

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