

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

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:
In re : Chapter 11
:
ADVANTA CORP., *et al.*, : Case No. 09-13931 (KJC)
:
Debtors.¹ : (Jointly Administered)
:
-----X **Re: Docket No. 38**

**CERTIFICATION OF COUNSEL REGARDING MOTION OF DEBTORS FOR AN
ORDER PURSUANT TO BANKRUPTCY CODE SECTION 105(A), BANKRUPTCY
RULE 1007 AND LOCAL RULE 1007-1 EXTENDING THE TIME TO FILE
SCHEDULES OF ASSETS AND LIABILITIES, SCHEDULES OF EXECUTORY
CONTRACTS AND UNEXPIRED LEASES, LISTS OF EQUITY SECURITY HOLDERS,
SCHEDULES OF CURRENT INCOME AND EXPENDITURES AND STATEMENTS
OF FINANCIAL AFFAIRS**

The undersigned certifies as follows:

1. On November 16, 2009, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed the **Motion of Debtors for an Order Pursuant to Bankruptcy Code Section 105(a), Bankruptcy Rule 1007 and Local Rule 1007-1 Extending the Time to File Schedules of Assets and Liabilities, Schedules of Executory Contracts and Unexpired Leases, Lists of Equity Security Holders, Schedules of Current Income and Expenditures and Statements of Financial Affairs** [Docket No. 38] (the “Motion”) with the

¹ The Debtors in these 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), Great Expectations International Inc. (0440), Great Expectations Franchise Corp. (3326), Great Expectations Management Corp. (3328), Advanta Ventures Inc. (5127), BizEquity Corp. (8960), Ideablob Corp. (0726), and Advanta Credit Card Receivables Corp. (7955). 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, NV 89119, and the Great Expectations entities maintain their principal corporate office at 1209 Orange Street, Wilmington, Delaware 19801.

United States Bankruptcy Court for the District of Delaware (the “Court”).


2. The undersigned certifies that he has reviewed the Court’s docket in the above-captioned chapter 11 cases and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Motion and Hearing, responses to the Motion were to be filed and served no later than 4:00 p.m. (Eastern Standard Time) on November 27, 2009.

3. The Debtors received certain informal comments (the “Comments”) to the Motion from the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”). Other than the Comments, the undersigned further certifies that neither he nor the Debtors have received further comments, objections or informal responses to the Motion. Attached hereto as Exhibit A is a revised form of order resolving the Comments (the “Revised Order”).² The Revised Order has been circulated to and is acceptable to the U.S. Trustee. For the convenience of the Court and all parties-in-interest, a blackline of the Revised Order against the proposed form of order filed with the Motion is attached hereto as Exhibit B.

² Pursuant to the *Order Pursuant to Section 105(a) of the Bankruptcy Code Directing That Certain Orders in the Chapter 11 Cases of Advanta Corp., et al., Be Made Applicable to New Debtors* [Docket No. 87], the Motion was made applicable to the New Debtors (as defined therein) and the New Debtors’ chapter 11 cases are being jointly administered with the First Filed Debtors’ (as defined therein) chapter 11 cases. Accordingly, footnote 1 has been revised in the Revised Order to include each of the New Debtors.

WHEREFORE, the Debtors respectfully request that the Revised Order, substantially in the form attached hereto as Exhibit A, be entered at the earliest convenience of the Court.

Dated: December 2, 2009
Wilmington, Delaware



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PROPOSED ATTORNEYS FOR
DEBTORS AND DEBTORS IN
POSSESSION

EXHIBIT A

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

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In re : Chapter 11
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ADVANTA CORP., *et al.*, : Case No. 09-13931 (KJC)
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Debtors.¹ : (Jointly Administered)
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**ORDER PURSUANT TO BANKRUPTCY CODE
SECTION 105(a), BANKRUPTCY RULE 1007 AND LOCAL
RULE 1007-1 EXTENDING THE TIME TO FILE SCHEDULES
OF ASSETS AND LIABILITIES, SCHEDULES OF EXECUTORY
CONTRACTS AND UNEXPIRED LEASES, LISTS OF EQUITY
SECURITY HOLDERS, SCHEDULES OF CURRENT INCOME AND
EXPENDITURES AND STATEMENTS OF FINANCIAL AFFAIRS**

Upon the motion (the “*Motion*”)² dated November 16, 2009 of Advanta Corp. and its affiliated debtors, as debtors and debtors in possession (collectively, the “*Debtors*”), pursuant to section 105(a) of title 11 of the United States Code (the “*Bankruptcy Code*”), Rule 1007(c) of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”), and Rule 1007-1(b) of the Local Rules of Bankruptcy Practice and

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² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Procedure of the United States Bankruptcy Court for the District of Delaware (the “*Local Rules*”), for an extension of time to file certain schedules and statements, as more fully described in the Motion; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the Notice Parties, and it appearing that no other or further notice need be provided; and this Court having determined that the relief sought in the Motion is in the best interests of the Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the time within which the Debtors must file their Schedules and Statements required by Bankruptcy Rule 1007 is enlarged and extended for an additional period of 45 days beyond the 30 day extension provided pursuant to Local Rule 1007-1(b) to January 25, 2010³; and it is further

ORDERED that such extension is without prejudice to the Debtors’ right to request a further extension of time within which to file the Schedules and Statements; and it is further

³ With the 45-day extension, the deadline to file the Schedules and Statements is Sunday, January 24, 2010. Pursuant to Bankruptcy Rule 9006(a), the deadline therefore automatically extends to Monday, January 25, 2010.

ORDERED that upon the consent of the Office of the United States Trustee for the District of Delaware and by order of this Court upon certification of counsel, the deadline for the Debtors to file their Schedules and Statements may be extended without the need for any additional motion practice on this subject in these chapter 11 cases; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

Dated: December _____, 2009
Wilmington, Delaware

THE HONORABLE KEVIN J. CAREY
CHIEF UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

(the “*Bankruptcy Rules*”), and Rule 1007-1(b) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “*Local Rules*”), for an extension of time to file certain schedules and statements, as more fully described in the Motion; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the Notice Parties, and it appearing that no other or further notice need be provided; and this Court having determined that the relief sought in the Motion is in the best interests of the Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the time within which the Debtors must file their Schedules and Statements required by Bankruptcy Rule 1007 is enlarged and extended for an additional period of ~~60~~ 45 days beyond the ~~30 days~~ day extension provided pursuant to Local Rule 1007-1(b) to ~~February 8~~ January 25, 2010³; and it is further

ORDERED that such extension is without prejudice to the Debtors’ right to request a further extension of time within which to file the Schedules and Statements; and it is further

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ORDERED that upon the consent of the Office of the United States Trustee for the District of Delaware and by order of this Court upon certification of counsel, the deadline for the Debtors to file their Schedules and Statements may be extended without the need for any additional motion practice on this subject in these chapter 11 cases; and it is further

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Dated: December , 2009 , 2009
Wilmington, Delaware
Wilmington, Delaware

THE HONORABLE KEVIN J. CAREY
CHIEF UNITED STATES BANKRUPTCY JUDGE