IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re	)	Chapter 11
	)	
Conseco Finance Corp ,	)	Case No 02-49675
	)	
Debtor	)	The Honorable Carol A Doyle
	)	
	)	

STIPULATION AND AGREED ORDER RESOLVING THE CFC ESTATE'S FORTY-FIRST OMNIBUS OBJECTION TO EDCO, INC.'S PROOFS OF CLAIM

The Plan Administrator on behalf of the Post-Consummation Estate of the Finance Company Debtors (the "**CFC Estate**"),[1] and Edco, Inc dba Investment Housing ("**EDCO, Inc.**") hereby stipulate (the "**Stipulation**") and agree as follows

RECITALS

WHEREAS, on or about March 24, 2003, Edco, Inc filed six proofs of claim against Conseco Finance Corp ("**CFC**") asserting a general unsecured claim in the aggregate amount of $12,700 00 designated on the claims register as Claim Nos **49675-000611, 49675-000610, 49675-000608, 49675-000607; 49675-000606; and 49675-000605** (together, the "**Claims**"), and

WHEREAS, the Plan authorizes the Plan Administrator, on behalf of the CFC Estate, to avoid and recover preferential transfers pursuant to sections 547 and 550 of title 11 of the United States Code, 11 U S C §§ 101 et seq (2004) (the "**Bankruptcy Code**"), and

[1] The post consummation estate for Conseco Finance Corp is the liquidating trust that holds in trust for distribution to creditors certain of the assets of the entities referred to as the "Finance Company Debtors" in the Finance Company Debtors' Sixth Amended Joint Liquidating Plan of Reorganization Pursuant to Chapter 11 of the United States Bankruptcy Code (the "**Plan**") Unless defined herein capitalized terms shall have the meaning stated in the Plan

WHEREAS, the Plan Administrator, on behalf of the CFC Estate, has reviewed all transactions made within the 90-day period immediately preceding the Petition Date (the "**Preference Period**") and this review has revealed that Edco, Inc received the sum of $30,835 61 in preferential transfers (the "**Preference Transfers**") from CFC during the Preference Period, and

WHEREAS, on June 16, 2004, the Plan Administrator filed the CFC Estate's Forty-First Omnibus Objection to Claims Pursuant to Section 502(d) of the Bankruptcy Code (the "**Objection**") requesting the disallowance of certain specified claims listed on the CFC Estate official claims register, including the Claims, given that Edco, Inc received the Preference Transfers and has not yet repaid the Preference Transfers to the CFC Estate, and

WHEREAS, the parties agree desire to resolve their dispute,

IT IS HEREBY STIPULATED AND AGREED, BY AND BETWEEN THE UNDERSIGNED PARTIES·

1 Edco, Inc agrees that its Claims will be disallowed in their entirety

2 This Stipulation resolves the Claims, and any other claims related in any way to any remaining amounts owed to Edco, Inc by the Finance Company Debtors or the CFC Estate Edco, Inc , on behalf of itself and its respective past, present and future affiliates, agents representatives, successors and assigns, hereby unconditionally fully releases and forever discharges the Finance Company Debtors, the Estates, the CFC Estate and the Plan Administrator, and each of their respective past, present and future affiliates, subsidiaries officers, directors, partners, members, shareholders, employees, agents, representatives, professionals, attorneys, successors and assigns (collectively, the "**Released Parties**"), from any and all claims (including, as defined in section 101(5) of title 11 of the United States Code),

or contemporaneous agreement may be used to alter the terms of this Stipulation

Dated October 26, 2004
Chicago, Illinois

GREENBERG TRAURIG, L L P

Keith J Shapiro (ARDC No 6184374)
Nancy A Peterman (ARDC No 6208120)
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Phone 312-456-8400
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Counsel for the CFC Estate

Dated October 19, 2004
Statesboro, Georgia

EDCO, Inc d/b/a Investment Housing

Edgar Beal
816 South Main Street
Statesboro, Georgia 30458
Telephone (912) 681-6714

SO ORDERED

Carol A. Doyle

Carol A Doyle
United States Bankruptcy Judge

10/27/04

UNITED STATES BANKRUPTCY COURT Northern DISTRICT OF Illinois Eastern Division

PROOF OF CLAIM

Name of Debtor	Case Number
Conseco Finance	02 49672

NOTE This form should not be used to make a claim for an administrative expense arising after the commencement of the case A "request" for payment of an administrative expense may be filed pursuant to 11 USC § 503.

Name of Creditor (The person or other entity to whom the debtor owes money or property)
EDCO, Inc. DBA Investment Housing

Name and address where notices should be sent.
Edgar Deal
816 S Main Street
Statesboro, Georgia 30458

Telephone number

☐ Check box if you are aware that anyone else has filed a proof of claim relating to your claim Attach copy of statement giving particulars

☐ Check box if you have never received any notices from the bankruptcy court in this case

☐ Check box if the address differs from the address on the envelope sent to you by the court

FILED
MAR 24 2003
BMC

THIS SPACE IS FOR COURT USE ONLY

Account or other number by which creditor identifies debtor

Check here if this claim ☐ replaces ☐ amends a previously filed claim dated

1 Basis for Claim

- Goods sold
- ☒ Services performed
- ☐ Money loaned
- ☐ Personal injury/wrongful death
- ☐ Taxes
- ☐ Other _____

Retiree benefit as defined in 11 U S C § 1114(a)

Wages, salaries and compensation (fill out below)

Your SS # _____ _____ _____

Unpaid compensation for services performed

from _____ (date) to _____ (date)

2. Date debt was incurred 10-15-02

3. If court judgment, date obtained.

4 Total Amount of Claim at Time Case Filed. $ 2000 00

If all or part of your claim is secured or entitled to priority, also complete Item 5 or 6 below

☐ Check this box if claim includes interest or other charges in addition to the principal amount of the claim Attach itemized statement of all interest or additional charges

5 Secured Claim.

☐ Check this box if your claim is secured by collateral (including a right of setoff)

Brief Description of Collateral

☐ Real Estate ☐ Motor Vehicle

☐ Other _____

Value of Collateral $_____

Amount of arrearage and other charges at time case filed included in secured claim if any $_____

6. Unsecured Priority Claim.

☐ Check this box if you have an unsecured priority claim

Amount entitled to priority $_____

Specify the priority of the claim.

- ☐ Wages salaries or commissions (up to $4 650) * earned within 90 days before filing of the bankruptcy petition or cessation of the debtor s business whichever is earlier 11 U S C § 507(a)(3)
- ☐ Contributions to an employee benefit plan 11 U S C § 507(a)(4)
- ☐ Up to $2 100* of deposits toward purchase lease or rental of property or services for personal family or household use 11 U S C § 507(a)(6)
- ☐ Alimony maintenance or support owed to a spouse former spouse or child 11 U S C § 507(a)(7)
- ☐ Taxes or penalties owed to governmental units 11 U S C § 507(a)(8)
- ☐ Other Specify applicable paragraph of 11 U S C § 507(a)(____)

Amounts are subject to adjustment on 4/1/04 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment

7 Credits. The amount of all payments on this claim has been credited and deducted for the purpose of making this proof of claim

8 Supporting Documents: *Attach copies of supporting documents,* such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, and evidence of perfection of lien DO NOT SEND ORIGINAL DOCUMENTS If the documents are not available, explain If the documents are voluminous, attach a summary

9 Date-Stamped Copy To receive an acknowledgment of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this proof of claim

THIS SPACE IS FOR COURT USE ONLY

Conseco Finance Corp Claim
49675000605

Date	Sign and print the name and title, if any of the creditor or other person authorized to file this claim (attach copy of power of attorney, if any)
3-19-03	Edgar Deal Edgar D. Deal Owner

Penalty for presenting fraudulent claim Fine of up to $500,000 or imprisonment for up to 5 years, or both 18 U S C §§ 152 and 3571

Company Name Investment Housing
Company Address 814 S Main St
Company Address Statesboro GA 30458
Company Address
Company Phone # 912 681 6713
Company Fax # 912 681 6714

Invoice # 1162
Date 10-15-02

General Finance
7406 Fullerton St #201
Jacksonville, FL 32256

Account # 1633782
Account Name Newell

Location of Unit Investment Hsg Statesboro GA

Description

	Material	Labor	Total
install tires & axles, bolt on tongues, disconnect, unblock, install plastic sheeting, pull to sales lot, lotset			1800 00
install vinyl on 2 ends			200 00
total due			2000 00
TOTALS	0 00	0 00	

CONSECO
Step up

Mickey,
Let me know if you are interested in bringing home to your lot
Thanks
Ben

REQUEST FOR DEALER TEAR DOWN AND PICK UP SHEET

CURRENT DATE September 11 2002

REPO NAME Holly Newell, #16332782 DATE TO MOVE ASAP

MAKE/MODEL SIZE 52 x 24 YEAR 1997

SERIAL NUMBER GMHGA4039714362AB

LOCATION 4383 Clyo Kildare Rd, Clyo, GA 31303

LOT RENT DUE

DIRECTIONS TO LOCATION See Map

DESTINATION Investment Housing CONTACT

ADDITIONAL INFORMATION

AXLES HAS		NEED (HOW MANY)	
WHEELS HAS		NEED (HOW MANY)	
TIRES HAS		NEED (HOW MANY)	
HITCH ON UNIT		UNDER UNIT (WELD ON)	
NEED TO TAKE HITCH (WELD ON)			
AUTHORIZED BY		WHO TO WELD	
AIR CONDITIONER ON UNIT		IN UNIT	
REMOVED/LEFT AT		CONTACT	
SKIRTING ON UNIT		IN UNIT	
REMOVED/LEFT AT		CONTACT	

ADDITIONAL INFORMAITON
Stove & fridge missing
Home has A/C