All Responses to Objections contained herein should be filed with the Court and served upon (1) Kirkland & Ellis LLP, Attn: Thomas J. Augspurger, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601 and (2) Greenberg Traurig, LLP, Attn: Andre Zafrani, 77 West Wacker Drive, Suite 2500, Chicago, Illinois 60601.

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

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
FEB - 6 2004
KENNETH S. GARDNER, CLERK
PS REP. • DR

In re:	)	**Chapter 11**
	)	
Conseco Finance Corp., et al.,[1]	)	
	)	**Case No. 02 B49675**
Debtors.	)	**Honorable Carol A. Doyle**
	)	**(Jointly Administered)**
	)	**Hearing Date: March 17, 2004, at 11:00 a.m.**
	)	**Objection Date: March 8, 2004**

NOTICE OF FILING OF CFC ESTATE'S TWENTY-FIRST OMNIBUS OBJECTION TO CLAIMS ASSERTED AGAINST THE FINANCE COMPANY DEBTORS (SUBSTANTIVE -- UNKNOWN, CONTINGENT AND UNLIQUIDATED)

PLEASE TAKE NOTICE that on or about February 13, 2004, the CFC Estate filed the *CFC Estate's Twenty-First Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive -- Unknown, Contingent and Unliquidated)* (the "Twenty-First Omnibus Objection") with the United States Bankruptcy Court for the Northern District of Illinois (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that service of the Twenty-First Omnibus Objection will be effected as follows:

1. The U.S. Trustee and the Core Group, as defined in the current Case Management Procedures, will receive service of the Twenty-First Omnibus Objection together with all Exhibits.

---

[1] The CFC Estate is the liquidating trust that holds the remaining assets of the Finance Company Debtors for distribution to creditors. The Finance Company Debtors were comprised of the following entities: (i) Conseco Finance Corp. and Conseco Finance Servicing Corp. (collectively, the "CFC Debtors"), (ii) Conseco Finance Corp. - Alabama, Conseco Finance Credit Corp., Conseco Finance Consumer Discount Company, Conseco Finance Canada Holding Company, Conseco Finance Canada Company, Conseco Finance Loan Company, Rice Park Properties Corporation, Landmark Manufactured Housing, Inc., Conseco Finance Net Interest Margin Finance Corp. I, Conseco Finance Net Interest Margin Finance Corp. II, Green Tree Finance Corp. - Two, Conseco Agency of Nevada, Inc., Conseco Agency of New York, Inc., Green Tree Floorplan Funding Corp., Conseco Agency, Inc., Conseco Agency of Alabama, Inc., Conseco Agency of Kentucky, Inc., and Crum-Reed General Agency, Inc. (collectively, the "CFC Subsidiary Debtors"), (iii) Green Tree Finance Corp. - Five and Conseco Finance Credit Card Funding Corp.

2. Those parties set forth on the 2002 List, as defined in the current Case Management Procedures, will receive service of the Twenty-First Omnibus Objection without Exhibits.

3. Each creditor with a Claim or Claims directly affected by the Twenty-First Omnibus Objection (each, an "Affected Creditor") will receive service of the Twenty-First Omnibus Objection as well as a Customized Notice setting forth the claim detail as reflected in the Exhibit on which such Affected Creditor is listed.[2]

PLEASE TAKE FURTHER NOTICE THAT a claim may be subject to multiple objection(s) as part of the Twenty-First Omnibus Objection, and that **EACH OBJECTION IS AN INDEPENDENT BASIS FOR DISALLOWANCE OF A CLAIM.**

PLEASE TAKE FURTHER NOTICE that:

1. A hearing on the Twenty-First Omnibus Objection will be held before the Honorable Carol A. Doyle, United States Bankruptcy Court, 219 S. Dearborn, Courtroom 742, Chicago, Illinois on **March 17, 2004 at 11:00 a.m.** (the "Claims Hearing").

2. Any party wishing to oppose the relief requested in the Twenty-First Omnibus Objection must file a written response with the Clerk of the U.S. Bankruptcy Court, 219 S. Dearborn, Chicago, IL 60604, and serve a copy of the response upon (i) Kirkland & Ellis LLP, Attn: Thomas J. Augspurger, Kirkland & Ellis LLP, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601, and (ii) Greenberg Traurig, LLP, Attn: Andre Zafrani, 77 West Wacker Drive, Suite 2500, Chicago, Illinois 60601, so as to be received on or before **March 8, 2004, at 4:00 p.m., prevailing central time**. Only those responses timely filed with the Court and timely received by the CFC Estate's counsel will be considered by the Court.

3. If no response is filed, served and received as required by **March 8, 2004, at 4:00 p.m., prevailing central time**, the Court will enter an order, similar to the attached form of

---

[2] The Customized Notice is being provided in lieu of serving the full set of Exhibits. The full set of Exhibits is voluminous. The CFC Estate believes that mailing of the same would be an unnecessary expense to the CFC Estate and would not provide any additional information to the Affected Creditor.

proposed order, disallowing reclassifying, reducing and/or allowing the Claim(s) as requested in the Twenty-First Omnibus Objection.

4. Any response should contain the following:

(i) a caption setting forth the name of the Court, the name of the CFC Estate, the case number and the title of the Objection to which the response is directed;

(ii) the name and contact information (including daytime telephone number) of the claimant and a description of the basis for the amount of the Claim;

(iii) the Claim number(s) and the Claim objection(s) to which the response is directed;

(iv) the specific factual basis and supporting legal argument upon which the party will rely in opposing the Twenty-First Omnibus Objection; and

(v) any supporting documentation, to the extent it was not included with the proof of claim previously filed with the Clerk or Claims Agent, upon which the party will rely to support the basis for and amounts asserted in the proof of claim.

5. The CFC Estate will endeavor to consensually resolve the CFC Estate's objection to the Claims with any party filing a timely response. If no agreement is reached, the dispute will be resolved by the Court.

6. If you file a response to the Twenty-First Omnibus Objection, you should be prepared to argue that response at the Claims Hearing unless you reach an agreement with the CFC Estate's counsel to settle or the CFC Estate continues your matter.

7. You need not respond to the Twenty-First Omnibus Objection or appear at the Claims Hearing if you do not object to the relief requested in the Twenty-First Omnibus Objection. If you do not timely file and serve a response to the Twenty-First Omnibus Objection, the relief requested in the Twenty-First Omnibus Objection will be granted without further notice to you. Failure to timely file a response to the Twenty-First Omnibus Objection shall be deemed (i) a waiver of your right to respond to the Twenty-First Omnibus Objection and

(ii) your consent to the relief requested in the Twenty-First Omnibus Objection with respect to your Claim.

8. Any party may obtain a copy of the Twenty-First Omnibus Objection with all Exhibits by requesting the same from BMC at (888) 909-0100 (telephone) or by accessing the BMC website at http://www.bmccorp.net/conseco.

9. The CFC Estate reserves the right to object in the future to any of the Claims set out in the Exhibits or the body of the Twenty-First Omnibus Objection on any grounds. Separate notice and a hearing will be scheduled for any such objection. **If you have any questions regarding your Claim(s), you should contact Bankruptcy Management Corporation at (888) 909-0100. If you have any questions regarding the Twenty-First Omnibus Objection, please call Kirkland & Ellis LLP at (312) 861-2000 extension 9904 and leave a message in the Conseco, Inc. Voicemail box.**

Chicago, Illinois

Dated: February 13, 2004

Respectfully submitted,

KIRKLAND & ELLIS LLP

James H.M. Sprayregen, P.C. (ARDC. No. 6190206)
Anup Sathy (ARDC No. 6230191)
Roger J. Higgins (ARDC No. 6257915)
Kirkland & Ellis LLP
200 East Randolph Drive
Chicago, IL 60601-6636
(312) 861-2000 (telephone)
(312) 861-2200 (facsimile)

Counsel for the CFC Estate

*** All responses to objections contained herein should be served upon (1) Kirkland & Ellis LLP, Attn: Thomas J. Augspurger, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601 and (2) Greenberg Traurig, LLP, Attn: Andre Zafrani, 77 West Wacker Drive, Suite 2500, Chicago, Illinois 60601.**