

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

In re:) **Chapter 11**
)
Conseco Finance Corp.¹)
) **Case No. 02 B49675**
) **Honorable Carol A. Doyle**
Debtor.)
) **Hearing Date: December 7, 2005, at 11:00 a.m.**

**[PROPOSED] AGENDA OF CFC ESTATE MATTERS SCHEDULED FOR HEARING
ON DECEMEBR 7, 2005, AT 11:00 A.M. IN COURTROOM 742**

1. **["Woodward Objection"]** CFC Estate's Objection to Claims of James and Brenda Woodward, et al. (docket 2727)
 - (a) Response of James Woodward, et al., to The Plan Administrator of the CFC Estate's Objection to Claim No. 49675-004353 (docket 2849)
 - (b) The Plan Administrator's Reply in Support of the Objection to Claim No. 49675-004353 Filed by James Woodward, et al. (docket 2898)

Status: Continued

2. **["U.S. Trustee Objection"]** U.S. Trustee Objection to Application by Becker & Poliakoff, P.A. as Counsel to the Official Committee of Unsecured Creditors of the CFC Debtors for Final Allowance of Compensation and Reimbursement (docket 7087)

Status: Resolved

3. **["CFC Preference Actions"]** CFC Estate's Preference Action Status List, attached hereto as Exhibit A
 - (a) CFC Estate v. Chipman, Adv. Case No. 03-3742 - Hearing on Joint Motion for Entry of Consent Judgment

Status: Going Forward

¹ The post consummation estate for Conseco Finance Corp. (the "CFC Estate") is the liquidating trust that holds in trust for distribution to creditors certain 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 (docket 5824).

[PROPOSED] AGENDA OF CFC ESTATE'S OMNIBUS CLAIMS OBJECTIONS

1. **[Omnibus Objections -- Continued]**- The CFC Estate has filed Omnibus Objections to the following claims, and respectfully requests that each Objection be continued to the omnibus hearing scheduled for January 11, 2006:

(a) **Continued:**

Omnibus Objection No.	Response Docket No.	Creditor Filing Response	Claim No(s). Affected	Basis for Objection	Continued To:
4	4345	Anthony & Patricia Munoz	49675-002708	No Supporting Documentation	1/11/06
50	2534	Patricia & Anthony Munoz	49675-002708	No Liability	1/11/06
52	N/A	Anthony & Patricia Munoz	49675-003542	No Liability	1/11/06
50	N/A	Cadlerock Joint Venture LP	49675-004363	Late Filed	1/11/06
51	N/A	Cadlerock Joint Venture LP	49675-003296	No Liability	1/11/06
51	N/A	Cadlerock Joint Venture LP	49675-004363	No Liability	1/11/06
51	N/A	GECC & GE Capital Consumer Card Co.	49675-004117	No Liability	1/11/06
51	N/A	Textron Financial Corporation	49675-002930	No Liability	1/11/06
51	2616	Textron Financial Corporation	49676-001483	No Liability	1/11/06

(b) **[Green Tree] Resolved by Stipulation**

Omnibus Objection No.	Response Docket No.	Creditor Filing Response	Claim No(s). Affected	Basis for Objection	Status:
51	N/A	Green Tree Investment Holdings LLC	49675-004009	No Liability	Resolved by Stipulation

(c) **[Lois] Continued pending outcome of summary judgment:**

Omnibus Objection No.	Response Docket No.	Creditor Filing Response	Claim No(s). Affected	Basis for Objection	Continued To:
51	N/A	Lois USA, Inc.	49675-000497	No Liability	Pending summary judgment

The Omnibus Objections with active claims objections comprise the following:

Finance Company Debtors' Fourth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Docket 3808- Original NIBS Number 3698)

Finance Company Debtors' Sixteenth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Reduce, Reclassify and Allow) (CFC Docket 473)

CFC Estate's Thirty-Ninth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive) (CFC Docket 1029)

CFC Estate's Forty-Sixth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive) (CFC Docket 1595)

CFC Estate's Fiftieth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive) (docket 2446)

CFC Estate's Fifty-First Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive) (docket 2556)

The Section 502(d) Omnibus Objections comprise the following:

CFC Estate's Twenty-Fourth Omnibus Objection to Claims Asserted Against the Finance Company Debtors' Estates Pursuant to Section 502(d) of the Bankruptcy Code (CFC Docket 689)

CFC Estate's Thirty-Second Omnibus Objection to Claims and Motions for Payment of Administrative Expenses Asserted Against the Finance Company Debtors (Supplemental Substantive Objection to Reclassify Certain Trust Collateral-Related Claims)

CFC Estate's Fortieth Omnibus Objection to Claims Pursuant to Section 502(d) of the Bankruptcy Code (CFC Docket 1014)

CFC Estate's Forty-First Omnibus Objection to Claims Pursuant to Section 502(d) of the Bankruptcy Code (CFC Docket 1206)

CFC Estate's Forty-Fourth Omnibus Objection to Claims Pursuant to Section 502(d) of the Bankruptcy Code (CFC Docket 1531).

The following omnibus objections have been resolved:

Finance Company Debtors' First Omnibus Objection to Claims Asserted Against the Finance Company Debtors

Finance Company Debtors' Second Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Docket 3527- Original NIBS Number 3420)

Finance Company Debtors' Third Omnibus Objection to Claims Asserted Against the Finance Company Debtors (docket 3614)

Finance Company Debtors' Fifth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Docket 3966)

Finance Company Debtors' Sixth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Docket 4128)

Finance Company Debtors' Seventh Omnibus Objection to Claims Asserted Against the Finance Company Debtors

Finance Company Debtors' Eighth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Docket 4904)

Finance Company Debtors' Ninth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Non-Substantive Objections) (Docket 5188)

Finance Company Debtors' Tenth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Non-Substantive Objections) (Docket 5394)

Finance Company Debtors' Eleventh Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive Objections)

Finance Company Debtors' Twelfth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Non-Substantive Objections)

Finance Company Debtors' Thirteenth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Non-Substantive Objections)

Finance Company Debtors' Fourteenth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive Objections)

Finance Company Debtors' Fifteenth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Non-Substantive Objections)

CFC Estate's Seventeenth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Non-Substantive)

CFC Estate's Eighteenth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive -- No Liability)

CFC Estate's Nineteenth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Contract Cure Claims) (CFC Docket 541)

CFC Estate's Twentieth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive -- No Liability) (CFC Docket 523)

CFC Estate's Twenty-First Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive -- Unknown, Contingent and Unliquidated) (CFC Docket 543)

CFC Estate's Twenty-Second Omnibus Objection to Claims And Motions For Payment of Administrative Expenses Asserted Against the Finance Company Debtors (Substantive Objection to Reclassify Certain Trust Collateral-Related Claims) (CFC Docket 518)

CFC Estate's Twenty-Third Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Non-Substantive)

CFC Estate's Twenty-Fifth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive- Unknown, Contingent and Unliquidated)

CFC Estate's Twenty-Sixth Omnibus Objection to Claims and Motions for Payment of Administrative Expenses Asserted Against the Finance Company Debtors (Supplemental Substantive Objection to Reclassify Certain Trust Collateral-Related Claims) (CFC Docket 799)

CFC Estate's Twenty-Seventh Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive- Reclassify, Reduce and Allow)

CFC Estate's Twenty-Eighth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive- No Liability) (CFC Docket 850)

CFC Estate's Twenty-Ninth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive)

CFC Estate's Thirtieth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive)

CFC Estate's Thirty-First Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Non-Substantive)

CFC Estate's Thirty-Third Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive) (CFC Docket 923)

CFC Estate's Thirty-Fourth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive) (CFC Docket 929)

CFC Estate's Thirty-Fifth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive)

CFC Estate's Thirty-Sixth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Non-Substantive)

CFC Estate's Thirty-Seventh Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive)

CFC Estate's Thirty-Eighth Omnibus Objection to Claims and Motions for Payment of Administrative Expenses Asserted Against the Finance Company Debtors (Supplemental Substantive Objection to Reclassify Certain Trust Collateral-Related Claims (CFC Docket 1027)

CFC Estate's Fifty-Second Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive) and Request for Shortened Notice of Hearing on the Objection (docket 2728)

CFC Estate's Forty-Third Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive) (CFC Docket 1210)

CFC Estate's Forty-Fifth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive Objection to Reclassify Certain Secured Attorney Claims)

CFC Estate's Forty-Seventh Omnibus Objection to Claims Asserted Against the Finance Company Debtors (No Liability--Trust Collateral--Lot Rent Claims)

CFC Estate's Forty-Eighth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (No Liability--Trust Collateral--Tax Claims)

CFC Estate's Forty-Ninth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive)

**CFC PREFERENCE ACTION STATUS CHART
DECEMBER 7, 2005 AT 11:00 A.M.**

Adversary Case No.	Defendant	Amount of Demand	Date Adversary Case Filed	Answer Due Date	Date Answer Filed	Extension Date	502(d) Objection	STATUS
04-03669	ACADEMY CONTRACTING SERVICES	\$36,338.44	10/6/2004	11/6/2004				Continued to 1/11/06
04-03671	ADVANCED SYSTEMS CONSULTING, INC.	\$59,220.00	10/6/2004	11/6/2004	10/19/2004		Omni 24 s81365	Opt-Out Defendant Non Responsive Continue to 1/11/06
04-03672	ALVARADO MOBILE HOME SERVICE	\$52,847.44	10/6/2004	11/6/2004				Continued to 1/11/06
04-04414	AMERICAN TELEPHONE AND TELEGRAPH***	\$1,818,731.51	12/16/2004	1/18/2004	2/18/2005			Continued to 1/11/06 MEDIATION
04-04395	BALLARD SPAHR & ANDREWS, ET AL. **	\$45,751.87	12/16/2004	1/18/2004	4/22/2005		Omni 24 49675-002908	Continued to 1/11/06 MEDIATION
04-03523	BETTER VALUE, INC.	\$112,857.92	9/22/2004	11/3/2004				Continued to 1/11/06
04-03525	BLUE RIBBON SERVICE, INC.	\$28,601.17	9/22/2004	11/3/2004				Continued to 1/11/06
04-03692	CAROLINA HOUSING CENTER	\$35,806.25	10/7/2004	11/7/2004				Continued to 1/11/06
04-03862	CF WEST LAKE LIMITED PARTNERSHIP	\$29,073.34	10/22/2004	11/22/2004				Continued to 1/11/06
03-3742	CHIPMAN, ET AL	\$169,648.00	6/23/2364	1/27/2003			Omni 52 49676-000159	Hearing on Joint Motion for Entry of Consent Judgment Going Forward
04-03868	COMROE HING LLP	\$181,592.64	10/22/2004	11/22/2004				Continued to 1/11/06
04-03535	DEBBIE JONES, D/B/A JONES MOBILE HOME REFURBISHING	\$109,127.17	9/22/2004	11/3/2004				Continued to 1/11/06
04-04415	DELOITTE & TOUCHE***	\$47,729.50	12/16/2004	1/18/2004	3/14/2005			Continued to 1/11/06 MEDIATION
04-03706	DR. BACON'S CUSTOM HOMES, INC., D/B/A DR. BACON'S AFFORDABLE HOUSING	\$57,470.39	10/7/2004	11/7/2004				Continued to 1/11/06
04-03543	E-CERTIFY, CORP., F/K/A CLIENTLINK, INC.	\$142,500.00	9/22/2004	11/3/2004				Continued to 1/11/06
04-03554	GERALDINE LLOYD	\$440,000.00	9/22/2004	11/3/2004				Continued to 1/11/06
04-03725	GOLD KEY HOMES, INC.	\$55,000.00	10/8/2004	11/8/2004				Continued to 1/11/06
04-03898	HAMMOND & FLANAGAN, LLP f/k/a HAMMOND, FLANAGAN & GARLAND	\$30,037.08	10/25/2004	11/29/2004				Continued to 1/11/06
04-03729	HIGH MESA HOME SERVICES, INC.	\$83,174.94	10/11/2004	11/10/2004	12/8/2004			Continued to 1/11/06 MEDIATION
04-03566	JF ADVERTISING, INC.	\$26,278.75	9/22/2004	11/3/2004	11/9/2004			Defendant is in Default of Settlement Agreement Continue to 1/11/06
04-03567	JIM HUCKLEBERRY, D/B/A SELECT PREOWNED HOMES	\$64,133.94	9/22/2004	11/3/2004	11/2/2004		Omni 41 s79763	Continued to 1/11/06
04-03574	KEN CRADDOCK MOBILE HOME	\$30,290.97	9/27/2004	11/3/2004	11/18/2004	11/17/2004		Defendant is in Default of Settlement Agreement Continue to 1/11/06
04-03912	KENNETH AND DEBBIE HUGHES	\$28,000.00	10/25/2004	11/29/2004				Continued to 1/11/06
04-03747	LEANNE GORDON, AN INDIVIDUAL	\$54,000.00	10/11/2004	11/10/2004				Continued to 1/11/06

**CFC PREFERENCE ACTION STATUS CHART
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Adversary Case No.	Defendant	Amount of Demand	Date Adversary Case Filed	Answer Due Date	Date Answer Filed	Extension Date	502(d) Objection	STATUS
04-03748	LONE STAR RV SALES	\$81,642.06	10/11/2004	11/10/2004	3/25/2005			Settled in Principle Continue to 1/11/06
04-03579	LONGS TRANSPORT	\$49,973.05	9/27/2004	11/3/2004	10/22/2004			Settled in Principle Continue to 1/11/06
04-03580	LOW COUNTRY HOUSING OUTLET	\$53,815.67	9/27/2004	11/3/2004				Continued to 1/11/06
04-03936	MORTGAGE SPECIALIST, INC.	\$60,477.25	10/25/2004	11/29/2004				Continued to 1/11/06
04-03772	NORTHSTAR CONSTRUCTION, INCORPORATED	\$70,704.32	10/12/2004	11/12/2004				Continued to 1/11/06
04-03941	NUSTYLE HOUSING INC. d/b/a NUSTYLE HOUSING	\$25,785.00	10/26/2004	11/29/2004				Continued to 1/11/06
04-03781	PEACH STATE HOME CENTER	\$41,022.60	10/12/2004	11/12/2004				Continued to 1/11/06
04-03782	PINNACLE HOUSING LLC	\$41,542.28	10/12/2004	11/12/2004				Continued to 1/11/06
04-03787	QUALITY SERVICE	\$57,667.35	10/12/2004	11/12/2004				Continued to 1/11/06
04-03792	REPO DEPOT, INC.	\$38,117.47	10/12/2004	11/12/2004				Continued to 1/11/06
04-03800	S & L SALES AND SERVICES	\$74,609.67	10/12/2004	11/12/2004				Continued to 1/11/06
04-04416	SBC COMMUNICATIONS, INC.***	\$57,615.35	12/16/2004	1/18/2004	1/18/2005			Continued to 1/11/06 MEDIATION
04-04417	SBC DATAComm***	\$165,980.30	12/16/2004	1/18/2004	1/18/2005			Continued to 1/11/06 MEDIATION
04-03611	SHAFFER & SCERNI LLC	\$52,103.25	9/28/2004	11/3/2004		1/31/2005		Defendant is in Default of Settlement Agreement Continue to 1/11/06
04-03804	SIL-V MOBILE HOME SERVICE	\$46,423.00	10/12/2004	11/12/2004				Continued to 1/11/06
04-03619	SOURCE, INC.	\$140,200.91	9/28/2004	11/3/2004	12/2/2004			Defendant is in Default of Settlement Agreement Continue to 1/11/06
04-03805	SOUTHERN CHOICE HOMES, INC.	\$77,670.46	10/12/2004	11/12/2004				Continued to 1/11/06
04-03810	STEELWOOD CONSTRUCTION, INC.	\$47,460.00	10/12/2004	11/12/2004				Continued to 1/11/06
04-03811	STEPP MOBILE HOMES, INC	\$35,984.34	10/12/2004	11/12/2004				Continued to 1/11/06
04-03812	TELCO DISTRIBUTORS INC.	\$34,229.92	10/12/2004	11/12/2004				Continued to 1/11/06
04-03651	THE COREA FIRM, P.L.L.C.	\$228,167.58	9/30/2004	11/3/2004				Continued to 1/11/06
04-03821	VALUE MOBILE HOME SALES, INC.	\$50,414.80	10/12/2004	11/12/2004				Continued to 1/11/06
04-03637	WASHINGTON CARRIERS INC.	\$57,180.43	9/28/2004	11/3/2004				Continued to 1/11/06
04-03638	WESTERN EMPIRE TRUCK SALES	\$91,499.00	9/28/2004	1/14/2005	3/15/2005	3/15/2005		Defendant is in Default of Settlement Agreement Continue to 1/11/06

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

In re:) **Chapter 11**
)
Conseco Finance Corp.¹)
)
Debtor) **Case No. 02 B 49675**
) **Honorable Carol A. Doyle**
) **(Jointly Administered)**
)
) **Hearing Date: December 7, 2005, at 11:00 a.m.**

NOTICE OF FILING

PLEASE TAKE NOTICE, that on December 1, 2005, we caused to be filed with the Clerk of the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division, **[Proposed] Agenda of CFC Estate Matters Scheduled for Hearing on December 7, 2005, at 11:00 a.m. in Courtroom 742**, a copy of which is attached hereto.

Dated: December 1, 2005

Respectfully submitted,
KIRKLAND & ELLIS LLP

By /s/ Micah E. Marcus
Counsel for the CFC Estate
James H.M. Sprayregen , P.C. (ARDC no. 61909206)
Anup Sathy (ARDC No. 6230191)
Roger J. Higgins (ARDC No. 6257915)
Micah E. Marcus (ARDC No. 6257569)
Kirkland & Ellis LLP
200 East Randolph Drive
Chicago, IL 60601-6636
(312) 861-2000 (telephone)
(312) 861-2200 (facsimile)

¹The post consummation estate for Conseco Finance Corp. (the "CFC Estate") is the liquidating trust that holds the assets of the Finance Company Debtors in trust for distribution to creditors.