

**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: August 3, 2005, at 11:00 a.m. |

**[PROPOSED] AGENDA OF CFC ESTATE MATTERS SCHEDULED FOR HEARING
ON AUGUST 3, 2005, AT 11:00 A.M. IN COURTROOM 742**

1. **["Objection to Comins' Claim"]** The Plan Administrator of the CFC Estate's Objection to Claim No. 49676-001375 Filed by Roger L. Comins (docket 1009)
 - (a) Declaration of Service (docket 1043)
 - (b) Response of Roger L. Comins to the Plan Administrator of the CFC Estate's Objection to Claim No. 49676-001375 (docket 1110)
 - (c) CFC Estate's 46th Omni Objection - Comin's Claim No. 49676-001375 has been amended and superseded by Claim No. 49675-004280 (docket 1595)
 - (d) CFC Estate's 52nd Omni Objection - Comin's Claim No. 49675-004282 - The Debtor has no liability (docket 2728)
- Status: Going forward**
2. **["Calvary Mobile Homes, Inc. - 2004 Motion"]** Ex Parte Motion for Order Compelling Rule 2004 Production of Documents (docket 3477, NIBS 3370)
 - (a) Finance Company Debtors' First Omnibus Objection to Claims Asserted Against the Finance Company Debtors (docket 3182, NIBS 3076)
 - (b) Declaration of Service (docket 3555, NIBS 3448)
 - (c) Order Granting the Relief Sought in the Debtors' First Omnibus Objection to Claims (docket 4251)

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).

- (d) Declaration of Service (docket 4454)
- (e) CFC Estate's Objection to Motion of Calvary Mobile Homes, Inc. for Entry of an Order Directing the Production of Documents by the Debtors Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (docket 2901)
- (f) CFC Estate's Memorandum of Law Supporting Its Objection to Claim No. 49676-0282 (docket 2903)
- (g) Calvary Mobile Homes, Inc.'s Memorandum of Law Supporting Its Claim Number 49676-0282 (docket 3030)
- (h) CFC Response to Calvary Mobile Homes, Inc.'s Memorandum of Law Supporting Its Claim Number 49676-0282 (docket 3074)
- (i) Calvary Mobile Homes, Inc.'s Response to CFC Estate's Response to Calvary's Memorandum of Law Supporting its Claim Number 49676-0282 (docket 7065)
- (j) CFC Estate's Reply to Calvary Mobile Home, Inc.'s Response to CFC Estate's Response to Calvary's Memorandum of Law Supporting its Claim Number 49676-0282 (docket TBD)

Status: Going forward

- 3. **["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 to September 13, 2005, Omnibus Hearing

- 4. **["Textron/Cadle Adversary"]** Textron Financial Corporation v. Conseco Finance Servicing Corporation; Adversary Proceeding 03-01870
 - (a) Order Requiring Mediation and Staying Further Proceedings (docket 98)
 - (b) Stipulated Order Setting Mediation Procedures (docket 99)

Status: Status

- 5. **["EMCC-MH Homes Motion to Enforce"]** Motion to Enforce Purchase Agreement Between Conseco Finance Corporation and EMCC-MH Homes LLC and Memorandum in Support (docket 3007)

- (a) Supplemental Notice of Motion for Motion to Enforce Purchase Agreement Between Conseco Finance Corporation and EMCC-MH Homes LLC and Memorandum in Support (docket 3043)
- (b) Memorandum in Support of Motion to Enforce Purchase Agreement Between Conseco Finance Corporation and EMCC-MH Homes LLC (docket 7042)
- (c) CFC Estate's Objection to Motion to Enforce Purchase Agreement Between Conseco Finance Corporation and EMCC-MH Homes LLC (docket 3167)

Status: Going forward

- 6. **["Rayette Garage Objections"]** CFC Estate's 24th and 52nd Omni Objections to Rayette Garage Claim Nos. 49675-003656 and 49675-000903 (docket 689 and 2728)
 - (a) Rayette Garage Response to CFC Estate's 24th Omni Objection to Claims (docket 806)
 - (b) CFC Estates Supplemental Objection to Claims of Rayette Garage (docket 3150)

Status: Withdrawn

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

1. Going forward:

| Omnibus Objection No. | Response Docket No. | Creditor Filing Response | Claim No(s). Affected | Basis for Objection | Status |
|------------------------------|----------------------------|---------------------------------|------------------------------|----------------------------|---------------|
| 2 | 6462 | Calvary Mobile Homes, Inc. | 49676-000282 | Debtor has no Liability | Going forward |
| 46 | N/A | Roger L. Comins | 49676-001375 | Amended | Going forward |
| 52 | N/A | Roger L. Comins | 49676-004280 | No Liability | Going forward |

2. Objection to be withdrawn:

| Omnibus Objection No. | Response Docket No. | Creditor Filing Response | Claim No(s). Affected | Basis for Objection | Status |
|------------------------------|----------------------------|---------------------------------|------------------------------|----------------------------|-------------------|
| 24 | 806 | Rayette Garage | 49675-00903 | 502(d) | Withdrawn/Allowed |
| 52 | None | Rayette Garage | 49675-003656 | No Liability | Withdrawn/Allowed |
| 24 | 806 | Rayette Garage | 49675-003656 | 502(d) | Withdrawn/Allowed |
| 52/24 | None | Bruce DeWald | 49675-000920 | Reduce | Withdrawn/Allowed |

3. [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 August 3, 2005:

(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 | 9/13/2005 |
| 50 | 2534 | Patricia & Anthony Munoz | 49675-002708 | No Liability | 9/13/2005 |
| 52 | N/A | Anthony & Patricia Munoz | 49675-003542 | No Liability | 9/13/2005 |
| 50 | N/A | Cadlerock Joint Venture LP | 49675-004363 | Late Filed | 9/13/2005 |
| 51 | N/A | Cadlerock Joint Venture LP | 49675-003296 | No Liability | 9/13/2005 |
| 51 | N/A | Cadlerock Joint Venture LP | 49675-004363 | No Liability | 9/13/2005 |
| 51 | N/A | GECC & GE Capital Consumer Card Co. | 49675-004117 | No Liability | 9/13/2005 |
| 51 | N/A | Green Tree Investment Holdings LLC | 49675-004009 | No Liability | 9/13/2005 |
| 51 | N/A | Textron Financial Corporation | 49675-002930 | No Liability | 9/13/2005 |

| Omnibus Objection No. | Response Docket No. | Creditor Filing Response | Claim No(s). Affected | Basis for Objection | Continued To: |
|------------------------------|----------------------------|---------------------------------|------------------------------|----------------------------|----------------------|
| 51 | 2616 | Textron Financial Corporation | 49676-001483 | No Liability | 9/13/2005 |

(b) **[Martinez] Continued:**

| Omnibus Objection No. | Response Docket No. | Creditor Filing Response | Claim No(s). Affected | Basis for Objection | Continued To: |
|------------------------------|----------------------------|---------------------------------|------------------------------|----------------------------|----------------------|
| 4 | 4295 | Daniel & Isabel Martinez | 49675-002401 | Debtor has no Liability | 9/13/2005 |
| 16 | 4295 | Daniel & Isabel Martinez | 49675-003705 | Reclassify | 9/13/2005 |
| 39 | 1177/2560 | Daniel & Isabel Martinez | 49675-004203 | No liability | 9/13/2005 |
| 46 | 1671-1672 | Daniel and Isabel Martinez | 49675-003705 | Amended | 9/13/2005 |

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

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' 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)

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)

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

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)