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, Chicago, Illinois 60601 and (2) Greenberg Traurig, LLP, Attn: Andre Zafrani, 77 West Wacker Drive, Suite 2500, Chicago, Illinois 60601.

U.S. B.C. DROP BOX
04 APR 20 PM 5:00

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**
Debtors.	)	**Honorable Carol A. Doyle**
	)	
	)	
	)	**Hearing Date: May 19, 2004, at 11:00 a.m.**
	)	**Response Deadline: May 11, 2004**

NOTICE OF FILING OF CFC ESTATE'S THIRTY - FIFTH OMNIBUS OBJECTION TO CLAIMS ASSERTED AGAINST THE FINANCE COMPANY DEBTORS (SUBSTANTIVE)

PLEASE TAKE NOTICE that on or about April 20, 2004, the CFC Estate filed the *CFC Estate's Thirty - Fifth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive)* (the "Thirty - Fifth 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 Thirty - Fifth 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 Thirty - Fifth Omnibus Objection together with all Exhibits.

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[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 identified 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.

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

3. Each creditor with a Claim or Claims directly affected by the Thirty - Fifth Omnibus Objection (each, an "Affected Creditor") will receive service of the Thirty - Fifth 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 Thirty - Fifth 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 Thirty - Fifth Omnibus Objection will be held before the Honorable Carol A. Doyle, United States Bankruptcy Court, 219 S. Dearborn, Courtroom 742, Chicago, Illinois on **May 19, 2004 at 11:00 a.m.** (the "Claims Hearing").

2. Any party wishing to oppose the relief requested in the Thirty - Fifth 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 **May 11, 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.

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[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.

3. If no response is filed, served and received as required by **May 11, 2004, at 4:00 p.m., prevailing central time**, the Court will enter an order, similar to the attached form of proposed order, disallowing the Claim(s) as requested in the Thirty - Fifth 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 Thirty - Fifth 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 Thirty - Fifth 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 the Claim or the CFC Estate continues your matter.

7. You need not respond to the Thirty - Fifth Omnibus Objection or appear at the Claims Hearing if you do not object to the relief requested in the Thirty - Fifth Omnibus Objection. If you do not timely file and serve a response to the Thirty - Fifth Omnibus Objection, the relief requested in the Thirty - Fifth Omnibus Objection will be granted without further notice to you. Failure to timely file a response to the Thirty - Fifth Omnibus Objection

shall be deemed (i) a waiver of your right to respond to the Thirty - Fifth Omnibus Objection and (ii) your consent to the relief requested in the Thirty - Fifth Omnibus Objection with respect to your Claim.

8. Any party may obtain a copy of the Thirty - Fifth 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.

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 Thirty - Fifth 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 Thirty - Fifth 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: April 27, 2004

Respectfully submitted,

KIRKLAND & ELLIS LLP

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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, Chicago, Illinois 60601 and (2) Greenberg Traurig, LLP, Attn: Andre Zafrani, 77 West Wacker Drive, Suite 2500, Chicago, Illinois 60601.**