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

IN RE:

CONSECO FINANCE CORPORATION,
Debtor

CHAPTER 11
CASE NO. 02 B49675

HONORABLE CAROL A DOYLE

Hearing Date: July 16, 2004 at 10:30 a.m.
Objection Date: July 7, 2004

RESPONSE TO OBJECTION TO CLAIM

NOW COMES, C&A Services, by and through the undersigned Attorney , and responds to the Objection to Claim filed June 16, 2004 and shows unto the Court the following:

1. That the Objection to Claim for Claim No. 49675-003803 in the amount of $22,823.50 states that that particular Claim was settled pursuant to a Lien Discharge Agreement. That that information is incorrect. A copy of the Lien Discharge Agreement is attached hereto as Exhibit "A" and incorporated by reference.

2. That the claim which was settled with C&A Services was in the amount of $21,646.00 which was paid to C&A Services. In Paragraph 7 of the Lien Discharge Agreement, it specifically states that C&A has an unsecured claim in the amount of $22,823.50 and that the Agreement does not bar that particular claim.

WHEREFORE, C&A SERVICES PRAYS FOR THE FOLLOWING RELIEF:

1. That the Objection to Claim No. 49675-003803 in the amount of $22,823.50 be denied.

2. That Conseco Finance Corporation be ordered to make distribution on payment of the Claim forthwith.

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
JUN 29 2004
KENNETH S. GARDNER, CLERK
PS REP. - CK

3. For such other and further relief as is just and proper.

This 22 day of June, 2004.

DIXON, DOUB, CONNER & FOSTER, PLLC

BY _____

Randy D. Doub
Attorney for Debtor
110 Arlington Boulevard
P.O. Drawer 8668
Greenville, NC 27835-8668
Telephone (252) 355-8100
Telecopier (252) 355-0271

CERTIFICATE OF SERVICE

I, Randy D. Doub, do hereby certify that I have served a copy of the foregoing RESPONSE TO OBJECTION TO CLAIM upon the following parties by placing a copy of same in a postage prepaid and sealed envelope, and deposited same in the depository of the U.S. Mail addressed as follows:

Kirkland and Ellis, LLP
Attn: Thomas J. Augspurger
200 East Randolph Drive, Suite 6500
Chicago, IL 60601

Greenberg Traurig, P.C.
Attn: Andre Zafrani
77 West Wacker Drive, Suite 2500
Chicago, IL 60601

This 22 day of June, 200__.

DIXON, DOUB, CONNER & FOSTER, PLLC

BY: _____

Randy D. Doub
Attorney for Debtor
110 E. Arlington Blvd.
P.O. Drawer 8668
Greenville, NC 27835-8668
Tel. 252-355-8100
Fax. 252-355-0271