FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
OCT 20 2004
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In Re:	)	Case No.02-49675
	)	
Conseco Finance Corp.,	)	The Honorable Carol A. Doyle
	)	
Debtor	)	Hearing Date, October 27, 2004
	)	Objection Date, October 20, 2004 at
	)	4:30pm
	)	Chapter 11

OBJECTIONS OF SOTIROFF & ABRAMCZYK, P.C. TO THE
MOTION FOR ENTRY OF ADMINISTRATIVE ORDER REGARDING ADVERSARY

Sotiroff & Abramczyk, P.C., ("S & A"), by its undersigned attorney, states as its objection to the motion of the Plan Administrator, on behalf of the Post-Consummation Estate for the Finance Company Debtors, (the "CFC Estate"), for entry of an order approving (1) discovery protocol, (2) omnibus hearing dates, (3) notice procedures, (4) case management procedures and (5) mediation procedures for preference actions, (the "Motion") as follows:

1. S & A objects to the provision of paragraphs 16, 19 and 22 of the Motion to the extent that those provisions would give the CFC Estate the right to unilaterally extend the period of time that a matter would be deemed a "Continued Adversary Proceeding".

2. S & A objects to paragraph 25 of the Motion to the extent that it permits the CFC Estate the right to designate the "Mediator" without the advice or consent of S & A.

3. S & A objects to paragraph 27 of the Motion regarding the compensation and payment of compensation for the Mediator. There is no discussion in the Motion of the method used to determine the compensation to be paid. It is not clear that services of a "Mediator" could not be obtained for a lesser fee.

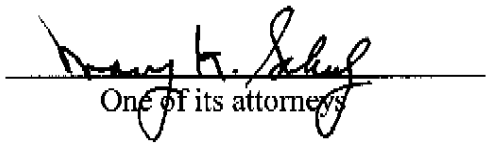
4. S & A objects to paragraph 28 of the Motion to the extent that payment is made to

the "Mediator" before any services are rendered.

5. S & A objects to paragraph 53 of the Motion because it does not include use of service by U.S. Mail delivery and replaces it with the more expensive means of hand delivery or overnight mail: or the requirement that a party accept service by e-mail.

WHEREFORE, Sotiroff & Abramczyk, P.C. prays for the entry of an order requiring the CFC Estate to revise its request for administrative order in accordance with these objections and for such further and additional relief as this Court deems right and just.

SOTIROFF & ABRAMCZYK, P.C.



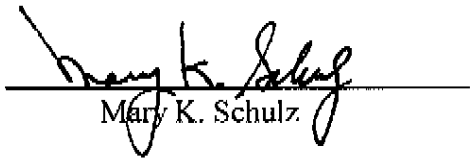
One of its attorneys

Mary K. Schulz, 6183773
Schulz & Associates, P.C.
135 S. LaSalle Street., Suite 2300
Chicago, IL 60603-4274
312.580-1224

CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that on October 20, 2004 I caused service of the foregoing **Objection to Motion for Entry of Administrative Order** by depositing a copy of the document postage prepaid, in the U.S. Mail at 135 S. LaSalle Street, Chicago, IL 60603, addressed to the parties listed below:

Greenberg Traurig, LLP
Attn: Nancy A. Peterman and
Robert W. Lannan
77 West Wacker Drive, Suite 2500
Chicago, IL 60601



Mary K. Schulz