

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

In re:)	Chapter 11
)	
Conseco Finance Corp.,)	Case No. 02 B49675
)	Honorable Carol A. Doyle
Debtor.)	
)	
)	
)	

NOTICE OF FILING

PLEASE TAKE NOTICE that on November 1, 2004, the undersigned counsel to the Plan Administrator, on behalf of the Post-Consummation Estate for the Finance Company Debtors (the “**CFC Estate**”)¹ caused to be e-filed with the Clerk of the United States Bankruptcy Court for the Northern District of Illinois (the “**Bankruptcy Court**”) a revised, proposed Order Approving (i) Discovery Protocol, (ii) Omnibus Hearing Dates, (iii) Notice Procedures, (iv) Case Management Procedures and (v) Mediation Procedures for Preference Actions (the “**Order**”) in the above-captioned Chapter 11 case. Counsel also caused to be e-filed to be e-filed with the Clerk of the Bankruptcy Court a redlined copy of the Order (the “**Redline**”), showing changes that the CFC Estate is proposing to respond to comments made the Court during a hearing on October 25, 2004.

The October 25, 4004 hearing was pursuant to the CFC Estate’s motion (the “**Motion**”) for entry of an order, pursuant to Sections 102(a), 105(a) and 547(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (2004) (the “**Bankruptcy Code**”),

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 (the “**Plan**”). Capitalized terms not otherwise defined herein shall have the meaning ascribed in the Motion or the Plan.

Rules 7026, 7029, 9006(c) and 9007 of the Federal Rules of Bankruptcy Procedure, and Rules 101, 402, 1000 and 9060-1(a) of the Bankruptcy Rules for the United States District Court and the United States Bankruptcy Court for the Northern District of Illinois, approving (i) discovery protocol, (ii) omnibus hearing dates, (iii) notice procedures, and (iv) other case management procedures, and (v) mediation procedures set forth herein, for those adversary proceedings seeking avoidance and recovery of preference payments pursuant to Sections 547 and 550 of the Bankruptcy Code. A continued hearing on this Motion will be held in Courtroom 742 of the United States Courthouse located at 219 South Dearborn Street, Chicago, Illinois on November 9, 2004 at 11:00 a.m. Central Time.

Copies of the Order and the Redline are enclosed with this notice.

Dated: November 1, 2004

**THE PLAN ADMINISTRATOR, ON BEHALF OF
THE CFC POST-CONSUMMATION ESTATE**

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