

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

In re:	)	Chapter 11
	)	Case No. 02-B-49675
CONSECO FINANCE CORP.,	)	(Jointly Administered)
	)	Hon. Carol A. Doyle
Debtor.	)	
	)	Motion Date: August 3, 2005
	)	Motion Tim: 11:00 a.m.

**NOTICE OF MOTION**

TO: George Mason Oliver Stubbs & Perdue, P.A. Post Office Box 1654 New Bern, North Carolina, 28563	Gus A. Paloian Charles S. Riecke Seyfarth Shaw LLP 55 East Monroe Street, Suite 4200 Chicago, Illinois 60603
M. Gretchen Silver, Esq. Office of the United States Trustee 227 West Monroe Street Suite 3350 Chicago, Illinois 60606	Anup Sathy, Esq. Roger J. Higgins, Esq. Kirkland & Ellis, L.L.P. 200 East Randolph Drive, Suite 6650 Chicago, Illinois 60601-6636
Calvary Mobile Homes Art Dellano, President 729 Greenville Boulevard Greenville, NC 27834	

PLEASE TAKE NOTICE THAT on August 3, 2005, at the hour of 11:00 a.m., a **MOTION FOR LEAVE TO WITHDRAW**, shall be heard by the Honorable Judge Carol A. Doyle of the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division, in Room 742 at 219 South Dearborn, Chicago, Illinois. A copy of same is attached hereto and thereby served upon you. You may appear if you so see fit.

**BENJAMIN, BERNEMAN, AND BROM, LLC**

**AFFIDAVIT OF SERVICE**

I, Robert R. Benjamin, an attorney, certify that I served the foregoing Notice of Motion upon the persons to whom it is addressed by mailing a copy of the same to them at the above address and depositing the same in the United States Mail at 216 West Jackson, Chicago, Illinois on June 20, 2005, with proper postage prepaid, and via Certified Mail with Return Receipt Requested upon Calvary Mobile Homes.

\s\ Robert R. Benjamin  
Robert R. Benjamin

BENJAMIN, BERNEMAN, AND BROM, LLC  
Attorney for Calvary Mobile Homes  
216 West Jackson Boulevard, Suite 330  
Chicago, Illinois 60606  
(312) 444-1996

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**MOTION FOR LEAVE TO WITHDRAW**

BENJAMIN, BERNEMAN AND BROM, LLC., attorneys for CALVARY MOBILE HOMES, INC.,  
moves this Court to grant them leave to withdraw as attorneys and in support thereof states as follows:

1. Benjamin, Berneman and Brom, LLC. seeks leave to withdraw as attorneys for CALVARY MOBILE HOMES, INC., because it has retained other local counsel, to wit Seyfarth Shaw who have appeared in this matter

2. The last known address of CALVARY MOBILE HOMES, INC., is:

Calvary Mobile Homes, Inc.  
729 Greenville Blvd.  
Greenville, NC 27834

3. Benjamin, Berneman and Brom, LLC. has notified CALVARY MOBILE HOMES, INC., by serving it by certified mail return receipt requested.

4. Currently pending is Calvary Mobile Home, Inc.'s Memorandum of Law Supporting Its Claim Number 49676-0282.

WHEREFORE, BENJAMIN, BERNEMAN AND BROM, LLC. prays as follows:

A. That they be granted leave to withdraw their appearance on behalf of CALVARY MOBILE HOMES, INC. and

B. For such other and further relief as this court deems just and proper.

BENJAMIN, BERNEMAN AND BROM, LLC.

By: /s/Robert R. Benjamin

Robert R. Benjamin

BENJAMIN, BERNEMAN AND BROM, LLC.  
Attorney for Calvary Mobile Homes, Inc.  
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