All Responses to Objections contained herein should be filed with the Court and served upon Thomas J. Augspurger, c/o Kirkland & Ellis LLP, 200 East Randolph Drive, Chicago, Illinois 60601.

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

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
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KENNETH S. GARDNER, CLERK
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In re:	)	**Chapter 11**
	)	
Conseco Finance Corp., et al.,[1]	)	
	)	**Case No. 02 B49675**
Debtors.	)	**Honorable Carol A. Doyle**
	)	**(Jointly Administered)**
	)	
	)	**Hearing Date: January 14, 2004**
	)	**Objection Deadline: January 5, 2004**

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

PLEASE TAKE NOTICE that on or about December 15, 2003, the CFC Estate filed the *CFC Estate's Fifteenth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Non-Substantive)* (the "Fifteenth 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 Fifteenth 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 Fifteenth Omnibus Objection together with all Exhibits.

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1 The CFC Estate is the liquidating trust that is the successor-in-interest to the Finance Company Debtors who comprise the following entities: (i) Conseco Finance Corp. and Conseco Finance Servicing Corp. (collectively, the "CFC Debtors"), (ii) Conseco Finance Corp. - Alabama, Conseco Finance Credit Corp., Conseco Finance Consumer Discount Company, Conseco Finance Canada Holding Company, Conseco Finance Canada Company, Conseco Finance Loan Company, Rice Park Properties Corporation, Landmark Manufactured Housing, Inc., Conseco Finance Net Interest Margin Finance Corp. I, Conseco Finance Net Interest Margin Finance Corp. II, Green Tree Finance Corp. - Two, Conseco Agency of Nevada, Inc., Conseco Agency of New York, Inc., Green Tree Floorplan Funding Corp., Conseco Agency, Inc., Conseco Agency of Alabama, Inc., Conseco Agency of Kentucky, Inc., and Crum-Reed General Agency, Inc. (collectively, the "CFC Subsidiary Debtors"), (iii) Green Tree Finance Corp. - Five and Conseco Finance Credit Card Funding Corp.

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

3. Each creditor with a Claim or Claims directly affected by the Fifteenth Omnibus Objection (each, an "Affected Creditor") will receive service of the Fifteenth 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 Fifteenth 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 Fifteenth Omnibus Objection will be held before the Honorable Carol A. Doyle, United States Bankruptcy Court, 219 S. Dearborn, Courtroom 742, Chicago, Illinois on **January 14, 2004 at 11:00 a.m.** (the "Claims Hearing").

2. Any party wishing to oppose the relief requested in the Fifteenth 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 Kirkland & Ellis LLP, Attn: Thomas J. Augspurger, Kirkland & Ellis LLP, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601, so as to be received on or before **January 5, 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.

3. If no response is filed, served and received as required by **January 5, 2004, at 4:00 p.m., prevailing central time**, the Court will enter an order, similar to the

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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 and includes claim detail for objections to more than 200 Claims. 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.

attached form of proposed order, disallowing the Claim(s) as requested in the Fifteenth 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 Fifteenth 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 Fifteenth 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 or continue your matter.

7. You need not respond to the Fifteenth Omnibus Objection or appear at the Claims Hearing if you do not object to the relief requested in the Fifteenth Omnibus Objection. If you do not timely file and serve a response to the Fifteenth Omnibus Objection, the relief requested in the Fifteenth Omnibus Objection will be granted without further notice to you. Failure to timely file a response to the Fifteenth Omnibus Objection shall be deemed (i) a waiver of your right to respond to the Fifteenth Omnibus