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

In re:	)	**Chapter 11**
	)	
Conseco Finance Corp., et al.,[1]	)	
	)	**Case No. 02 B49675**
Debtors.	)	**Honorable Carol A. Doyle**
	)	**(Jointly Administered)**
	)	**Hearing Date: March 17, 2004, at 11:00 a.m.**
	)	**Objection Date: March 8, 2004**

CFC ESTATE'S TWENTIETH OMNIBUS OBJECTION
TO CLAIMS ASSERTED AGAINST THE FINANCE COMPANY DEBTORS
(SUBSTANTIVE -- NO LIABILITY)

The Post Consumation Estate on behalf of the Finance Company Debtors (the "CFC Estate") hereby files the *CFC Estate's Twentieth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive -- No Liability)* (the "Twentieth Omnibus Objection"), and respectfully states as follows and in support thereof:

JURISDICTION

1. This Court has jurisdiction over this Twentieth Omnibus Objection under 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding and this Twentieth Omnibus Objection is properly in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
FEB 18 2004
KENNETH S. GARDNER, CLERK
PS REP. - DR

[1] The CFC Estate is the liquidating trust that holds the remaining assets of the Finance Company Debtors for distribution to creditors. The Finance Company Debtors were comprised of 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. The statutory basis for the relief requested herein is section 502 of the United States Bankruptcy Code (the "Bankruptcy Code").

3. In addition to complying with all applicable provisions of the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure, the CFC Estate will (in the absence of a local rule on omnibus objections to claims) substantially adhere to Rule 3007-1 of the Local Rules for the United States Bankruptcy Court for the District of Delaware as a matter of good practice.

BACKGROUND

4. On April 14, 2003, the Court set (i) May 22, 2003, as the bar date by which non-governmental entities wishing to assert pre-petition claims against the Finance Company Debtors must file proofs of claim (the "CFC Prepetition Claims Bar Date"); (ii) June 17, 2003, as the bar date by which governmental entities wishing to assert claims against the CFC Initial Debtors must file proofs of claim (the "CFC Initial Debtors' Governmental Bar Date"); and (iii) August 4, 2003, as the bar date by which governmental entities wishing to assert claims against the CFC Subsidiary Debtors must file proofs of claim (the "CFC Subsidiary Debtors' Governmental Bar Date"). On September 9, 2003, the Court set November 8, 2003, as the bar date by which entities wishing to assert administrative expense claims against the CFC Estate must file their requests for payment of administrative expenses (the "CFC Administrative Bar Date," and together with the CFC Prepetition Claims Bar Date, the CFC Initial Debtors' Governmental Bar Date and the CFC Subsidiary Debtors' Governmental Bar Date, the "Claims Bar Dates").

5. On March 14, 2003, the Court entered its *Order Approving and Authorizing (I) Asset Purchase Agreement with CFN Investment Holdings LLC (II) Sale of Certain of the CFC Debtors Assets Free and Clear of Liens, Claims and Encumbrances (III)*

Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Certain Related Relief (docket 1985) (the "CFN Sale Order"). As part of the assets sold pursuant to the CFN Sale Order, CFC assigned its servicing obligations under various Pooling and Servicing Agreements to CFN. On June 23, 2003, the sale of assets to CFC closed.

6. On September 9, 2003, the Court entered its *Order Confirming Finance Company Debtors' Sixth Amended Joint Liquidating Plan of Reorganization Pursuant to Chapter 11 of the United States Bankruptcy Code* (the "Confirmation Order"). Pursuant to the Confirmation Order, the Finance Company Debtors' estates and all of the debts of the Finance Company Debtors were substantively consolidated as set forth in Article II.A of the *Finance Company Debtors' Sixth Amended Joint Liquidating Plan of Reorganization Pursuant to Chapter 11 of the United States Bankruptcy Code* (the "Plan") at which time all remaining assets of CFC were transferred to the CFC Estate.. On September 15, 2003, the Plan became effective (the "Effective Date").

THE OBJECTION AND REQUEST FOR RELIEF

7. By this Twentieth Omnibus Objection, the CFC Estate seeks to disallow certain Claims set forth in **Exhibit A** attached hereto (the "No Liability Claims"). The No Liability Claims represent Claims for which the CFC Estate has no liability for according to its books and records and applicable law.

8. The CFC Estate objects to the No Liability pursuant to section 502(b)(1) of the Bankruptcy Code because the No Liability Claims are not enforceable against the CFC Estate or its property under any agreement or applicable law. Each of the Claims attached in **Exhibit A** are based upon a Proof of Claim for which either (a) the alleged liability has been satisfied by prior agreement; (b) the alleged liability arises from an executory contract that has been assumed or assigned by the CFC Estate and a cure amount determined and/or paid; or (c) is

based upon a an alleged fact or theory of recovery for which the CFC Estate has no record and/or is not liable.

9. For these reasons, the CFC Estate has no liability for any of the No Liability Claims and each should be disallowed for all purposes against the CFC Estate.

THE CLAIMS HEARING AND RESPONSES TO THE TWENTIETH OMNIBUS OBJECTION

10. The CFC Estate has requested that a hearing on the Twentieth Omnibus Objection be held before the Honorable Carol A. Doyle, United States Bankruptcy Court, 219 S. Dearborn, Courtroom 742, Chicago, Illinois on **March 17, 2004, at 11:00 a.m.** (the "Claims Hearing").

11. Any party wishing to oppose the relief requested in the Twentieth 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:

(a) Kirkland & Ellis LLP, Attn: Thomas J. Augspurger, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601; and

(b) Greenberg Traurig, LLP, Attn: Andre Zafrani, 77 West Wacker Drive, Suite 2500, Chicago, Illinois 60601

so as to be received on or before **March 8, 2004, at 4:00 p.m., prevailing central time**. Only those responses timely filed and received by counsel for the CFC Estate, Greenberg Traurig and the Court will be considered by the Court.

12. If no response is filed, served and received as required by **March 8, 2004, at 4:00 p.m., prevailing central time**, the CFC Estate will request the Court to enter an order disallowing the Claim(s) as requested in this Twentieth Omnibus Objection.

13. Any response should contain the following:

(a) a caption setting forth the name of the Court, the name of the CFC Estate, the case number and the title of this Twentieth Omnibus Objection to which the response is directed;

(b) the name and contact information (including daytime telephone number and facsimile) of the claimant and a description of the basis for the amount of the Claim;

(c) the Claim number(s) and the Claim objection(s) to which the response is directed;

(d) the specific factual basis and supporting legal argument upon which the party will rely in opposing the Twentieth Omnibus Objection; and

(e) any and all 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.

14. 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 Court will resolve the dispute.

15. Any party that files a response to the Twentieth Omnibus Objection should be prepared to argue that response at the Claims Hearing unless such party reaches an agreement with the CFC Estate's counsel to settle or the CFC Estate elects to continue the relevant matter prior to the Claims Hearing.

16. No party need respond to the Twentieth Omnibus Objection or appear at the Claims Hearing if such party does not object to the relief requested in the Twentieth Omnibus Objection. If a party does not timely file and serve a response to the Twentieth Omnibus Objection, the relief requested in the Twentieth Omnibus Objection will be granted without further notice to such party. Failure to timely file a response to the Twentieth Omnibus Objection shall be deemed (i) a waiver of a party's right to respond to the Twentieth Omnibus Objection; and (ii) such party's consent to the relief requested herein.

RESERVATION

17. The CFC Estate hereby reserves the right to object in the future to any of the Claims listed in this Twentieth Omnibus Objection or on the Exhibits attached hereto on any ground, and to amend, modify and/or supplement this Twentieth Omnibus Objection, including without limitation, to object to amended, surviving, transferred, re-classified and newly-filed Claims. Separate notice and a hearing will be scheduled for any such objection.

NOTICE

18. The CFC Estate's noticing and claims agent, Bankruptcy Management Corporation ("BMC"), will serve copies of this Twentieth Omnibus Objection (with all exhibits) on the U.S. Trustee and the Core Group as defined in the current Case Management Procedures.

19. BMC will serve copies of this Twentieth Omnibus Objection (without exhibits) on the 2002 List, as defined in the current Case Management Procedures. Any party may obtain a copy of the Twentieth Omnibus Objection with all Exhibits by requesting the same from BMC at (888) 909-0100 or by accessing the BMC website at http://www.bmccorp.net/conseco.

20. BMC will also serve a copy of the Twentieth Omnibus Objection upon those creditors whose Claims are affected by the Twentieth Omnibus Objection (the "Affected Creditors"). Additionally, and in lieu of serving all Exhibits upon all Affected Creditors, BMC will serve all Affected Creditors with a customized notice (the "Customized Notice") setting forth the claim detail specific to their respective Claims.[2] A sample Customized Notice, substantially in the form of the Customized Notices that will be served upon Affected Creditors, is attached hereto as **Exhibit B**.

2 The full set of Exhibits is voluminous. Mailing of the Exhibits would be an unnecessary expense to the CFC Estate and would not provide any additional information to the Affected Creditors.

21. Based upon the foregoing, the CFC Estate submits that notice of this Twentieth Omnibus Objection is sufficient under Fed. R. Bankr. P. 3007 and that no other or further notice is necessary.

NO PREVIOUS REQUEST

22. No previous request for the relief set forth herein has been made to this or any other Court.

ATTACHMENT OF PROOFS OF CLAIM

23. Proofs of claim for all Claims affected by this Twentieth Omnibus Objection have been saved to compact disk, to be attached as **Exhibit C**, and will be provided to the Court as required by the Court's Standing Order No. 9. Any party may obtain a copy of such Claims by requesting the same from BMC at (888) 909-0100 or by accessing the BMC website at http://www.bmccorp.net/conseco.

WHEREFORE, the CFC Estate respectfully requests that the Court enter an Order, substantially in the form attached hereto as **Exhibit D**, disallowing each of the Claims described in this Twentieth Omnibus Objection and shown on the Exhibit(s) attached hereto and for such further relief as is just and proper.

Chicago, Illinois

Dated: February 13, 2004

Respectfully submitted,

KIRKLAND & ELLIS LLP

James H.M. Sprayregen, P.C. (ARDC. No. 6190206)
Anup Sathy (ARDC No. 6230191)
Roger J. Higgins (ARDC No. 6257915)
Kirkland & Ellis LLP
200 East Randolph Drive
Chicago, IL 60601-6636
(312) 861-2000 (telephone)
(312) 861-2200 (facsimile)

Counsel for the CFC Estate

*** All responses to objections contained herein should be served upon (1) Kirkland & Ellis LLP, Attn: Thomas J. Augspurger, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601; and (2) Greenberg Traurig LLP, Attn: Andre Zafrani, 77 West Wacker Drive, Suite 2500, Chicago, Illinois 60601.**

In re: Conseco Finance Corp., et al.

OMNIBUS 20: EXHIBIT A - NO LIABILITY CLAIMS

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Date Claim Filed	Reason For Proposed Disallowance
1	ALL AMERICAN LAND SERVICES INC 15260 CASCADE ELM GROVE WI 53122	02-49675	49675-002633 CONSECO FINANCE CORP.	$101,793.45	(U)	5/21/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM.
2	AMBASSADORS PERFORMANCE GROUP, INC ATTN: MIKE COSTELLO 1071 CAMELBACK ST NEWPORT BEACH CA 92660-3228	02-49676	s82966 CONSECO FINANCE SERVICING CORP.	$4,038.55	(U)		DEBTOR HAS NO LIABILITY FOR THIS CLAIM WHICH WAS PREVIOUSLY PAID.
3	AUTOMATED COLLECTION TECHNOLOGIES INC MICHELLE E SHRIRO FOUNDERS SQUARE 900 JACKSON ST #120 DALLAS TX 75202	02-49675	49675-002776 CONSECO FINANCE CORP.	$87,579.53	(U)	5/21/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM.
4	AVAYA FKA LUCENT TECHNOLOGIES C/O D&B/RMS BANKRUPTCY SERVICES PO BOX 5126 TIMONIUM MD 21094	02-49675	49675-003734 CONSECO FINANCE CORP.	$171,830.92	(P)	10/3/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. THE SUBJECT CONTRACT WAS ASSUMED BY GREEN TREE.
5	BI PERFORMANCE SERVICES PO BOX 1521 MINNEAPOLIS MN 55480-1521	02-49675	s81429 CONSECO FINANCE CORP.	$8,350.00	(U)		DEBTOR HAS NO LIABILITY FOR THIS CLAIM.
6	BI PERFORMANCE SERVICES PO BOX 1521 MINNEAPOLIS MN 55480-1521	02-49676	s84351 CONSECO FINANCE SERVICING CORP.	$85,549.39	(U)		DEBTOR HAS NO LIABILITY FOR THIS CLAIM.
7	CERIDIAN EMPLOYER SERVICES INC PO BOX 10989 NEWARK NJ 07193-0989	02-49675	s81418 CONSECO FINANCE CORP.	$25,468.16	(U)		DEBTOR HAS NO LIABILITY FOR THIS CLAIM.

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees.

**(A) - Administrative (P) - Priority (S) - Secured (U) - Unsecured (T) - Total

In re: Conseco Finance Corp., et al.

OMNIBUS 20: EXHIBIT A - NO LIABILITY CLAIMS

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Date Claim Filed	Reason For Proposed Disallowance
8	CONNECTICUT GENERAL LIFE INSURANCE CO JOHN ASSIS ESQ CIGNA HEALTHCARE 900 COTTAGE GROVE RD W26 HARTFORD CT 06152-6026	02-49675 CONSECO FINANCE CORP.	49675-003053	$317,136.62	(U)	5/20/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM WHICH AROSE FROM AN INVOICE DISPUTE THAT WAS RESOLVED PRIOR TO THE PETITION DATE.
9	EASTRICH NO 167 CORPORAT ON C/O PARADIGM PROPERTIES 2600 CORPORATE EXCHANGE DR STE 175 COLUMBUS OH 43231	02-49676 CONSECO FINANCE SERVICING CORP.	49676-001299	$232,876.99	(U)	5/15/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. THE SUBJECT CONTRACT WAS ASSUMED BY GREEN TREE.
10	EXL SERVICES	02-49675 CONSECO FINANCE CORP.	s76897	$286,851.00	(U)		DEBTOR HAS NO LIABILITY FOR THIS CLAIM WHICH WAS PAID BY CNC.
11	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000455	$1,927.22	(U)	2/21/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.
12	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000793	$2,653.77	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.
13	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000794	$1,338.16	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.
14	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000795	$2,202.13	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees. **(A) - Administrative (P) - Priority (S) - Secured (U) - Unsecured (T) - Total

In re: Conseco Finance Corp., et al.

OMNIBUS 20: EXHIBIT A - NO LIABILITY CLAIMS

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Date Claim Filed	Reason For Proposed Disallowance
15	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000796	$2,628.28	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.
16	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000797	$2,241.96	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.
17	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000798	$1,909.80	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.
18	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000799	$169,436.05	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.
19	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000801	$2,789.38	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.
20	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000802	$2,860.43	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.
21	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000803	$2,104.23	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.
22	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000805	$1,985.25	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees. **(A) - Administrative (P) - Priority (S) - Secured (U) - Unsecured (T) - Total

In re: Conseco Finance Corp., et al.

OMNIBUS 20: EXHIBIT A - NO LIABILITY CLAIMS

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Date Claim Filed	Reason For Proposed Disallowance
23	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000806	$1,607.56	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.
24	EXPANETS 9780 MT PYRAMID CT #400 ENGLEWOOD CO 80112	02-49675 CONSECO FINANCE CORP.	49675-000807	$760.00	(U)	3/24/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CFC DID NOT RENEW ANNUAL CONTRACT WITH CLAIMANT. THE CLAIM IS FOR UNAUTHORIZED SERVICES.
25	HOME CITY LTD EVERETT GASKINS HANCOCK STEVENS PO BOX 911 RALEIGH NC 27602	02-49676 CONSECO FINANCE SERVICING CORP.	49676-002150	$9,000,000.00	(U)	7/9/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM.
26	JACO, HERBERT 705 E 26TH ST SAN BERNARDINO CA 92404-4049	02-49675 CONSECO FINANCE CORP.	49675-001798	$14,000.00	(U)	5/5/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CLAIMANT FINANCED A BOAT PURCHASE. THE LOAN WAS FULLY FUNDED IN ACCORDANCE WITH THE LOAN AGREEMENT.
27	LAKE COUNTY CLERK OF COURTS 550 WEST MAIN ST PO BOX 7800 TAVARES FL 32778-7800	02-49675 CONSECO FINANCE CORP.	s78511	$62,944.87	(U)		DEBTOR HAS NO LIABILITY FOR THIS CLAIM.
28	LIFE CENTER ACADEMY HONIG & GREENBERG LLC 1307 WHITE HORSE RD #F 603 VOORHEES NJ 08043-2076	02-49676 CONSECO FINANCE SERVICING CORP.	49676-000933	$21,705.24	(S)	5/5/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. PROPERTY TAXES WERE CURED BY CFC.
29	MTD PRODUCTS INC PO BOX 368023 CLEVELAND OH 44136	02-49675 CONSECO FINANCE CORP.	49675-002573	$34,328.04	(S)	5/22/2003	CLAIM RESOLVED BY BANKRUPTCY COURT-APPROVED SETTLEMENT DATED 7/23/03, BETWEEN CFSC AND TEXTRON FINANCIAL CORPORATION (SEE RELATED DOCKET NO. 4337).
30	SHARP ELECTRONIC FINANCIA PO BOX 642333 PITTSBURGH PA 15264	03-04709 RICE PARK PROPERTIES CORPORATION	s120375	$185.33	(U)		DEBTOR HAS NO LIABILITY FOR THIS CLAIM.

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees. **(A) - Administrative (P) - Priority (S) - Secured (U) - Unsecured (T) - Total

In re: Conseco Finance Corp., et al.

OMNIBUS 20: EXHIBIT A - NO LIABILITY CLAIMS

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Date Claim Filed	Reason For Proposed Disallowance
31	SHARP ELECTRONICS FINANCIAL SERVICES ATTN: MIKE TORTICILLI PO BOX 642333 PITTSBURGH PA 15264-2333	02-49675 CONSECO FINANCE CORP.	sv130609	$178,755.70	(U)		DEBTOR HAS NO LIABILITY FOR THIS CLAIM.
32	STATE OF NORTH DAKOTA UNCLAIMED PROPERTY STATE LAND DEPARTMENT PO BOX 5523 BISMARCK ND 58506-5523	02-49675 CONSECO FINANCE CORP.	49675-003544	UNKNOWN	(U)	6/17/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. DEBTOR HAS NO PROPERTY THAT QUALIFIES AS UNCLAIMED PROPERTY.
33	STATE OF WYOMING TREASURER'S OFFICE UNCLAIMED PROPERTY DIVISION 2515 WARREN AVE #502 CHEYENNE WY 82002	03-04692 CONSECO AGENCY OF ALABAMA, INC.	04692-000047	UNKNOWN	(P)	6/18/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. DEBTOR HAS NO PROPERTY THAT QUALIFIES AS UNCLAIMED PROPERTY.
34	SYBASE INC PO BOX 63000 SAN FRANCISCO CA 94160-0001	02-49675 CONSECO FINANCE SERVICING CORP.	s84291	$66,242.74	(U)		DEBTOR HAS NO LIABILITY FOR THIS CLAIM.
35	THAMES, ALEX 2680 PIERCE ST HUDSONVILLE MI 49426-1823	02-49675 CONSECO FINANCE CORP.	49675-002273	$39,389.50	(S)	5/14/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. CLAIMANT SIGNED A LOAN AGREEMENT WHICH WAS FULLY FUNDED IN ACCORDANCE WITH THE AGREEMENT.
36	UNCLAIMED PROPERTY PO BOX 2478 RICHMOND VA 23218-2478	02-49675 CONSECO FINANCE CORP.	49675-002104	UNKNOWN	(U)	5/15/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM. DEBTOR HAS NO PROPERTY WHICH QUALIFIES AS UNCLAIMED PROPERTY.
37	US BANCORP BUSINESS EQUIPMENT FINANCE ATTN CORPORATE ATTORNEY 1310 MADRID ST #100 C/O BCL CAPITAL MARSHALL MN 56258	02-49675 CONSECO FINANCE CORP.	49675-000253	$9,592.73	(S)	2/7/2003	DEBTOR HAS NO LIABILITY FOR THIS CLAIM.

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees. **(A) - Administrative (S) - Secured (T) - Total
(P) - Priority (U) - Unsecured

In re: Conseco Finance Corp., et al.

OMNIBUS 20: EXHIBIT A - NO LIABILITY CLAIMS

	Creditor Name / Address	Case Number	Claim Number	Total Claim Dollars*	Claim Class**	Date Claim Filed	Reason For Proposed Disallowance
35	US BANK NATIONAL ASSOCIAT ON AS SEC TTEE TIMOTHY PILLAR VP 60 LIVINGSTON AVE ST PAUL MN 55107-2292	02-49675 CONSECO FINANCE CORP.	49675-004014	UNKNOWN	(A)	11/10/2003	THE DEBTOR HAS NO LIABILITY FOR THIS CLAIM.
39	US BANK TRUST NATIONAL ASS CM-9704 SAINT PAUL MN 55170 Also filed as Paid - Post-Petition on Omni No.	02-49675 CONSECO FINANCE CORP.	s81258	$522,793.86	(U)		THE DEBTOR HAS NO LIABILITY FOR THIS CLAIM.
40	WORLDCOM 205 N MICHIGAN CHICAGO IL 60601 Also filed as Paid - Post-Petition on Omni No.	02-49675 CONSECO FINANCE CORP.	49675-000436	$566,301.00	(P)	2/5/2003	THE DEBTOR HAS NO LIABILITY FOR THIS CLAIM.

totals:	$105,015.51	(S)
	$738,131.92	(P)
	$11,190,630.71	(U)

*Plus, in certain instances, additional contingencies, unliquidated amounts, interest, penalties and/or fees. **(A) - Administrative (P) - Priority (S) - Secured (U) - Unsecured (T) - Total

All Responses to Objections contained herein should be filed with the Court and served upon (1) Kirkland & Ellis LLP, Attn: Thomas J. Augspurger, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601 and (2) Greenberg Traurig, LLP, Attn: Andre Zafrani, 77 West Wacker Drive, Suite 2500, Chicago, Illinois 60601.

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

In re:	) **Chapter 11**
Conseco Finance Corp., et al.,[1]	) **Case No. 02 B49675**
	) **Honorable Carol A. Doyle**
Debtors.	) **(Jointly Administered)**
	) **Hearing Date: March 17, 2004, at 11:00 a.m.**
	Objection Date: March 8, 2004

AMBAC ASSURANCE CORPORATION

JONATHAN D FORSTOT ESQ
THACHER PROFFITT & WOOD LLP
TWO WORLD FINANCIAL CENTER
NEW YORK NY 10281

03107063133612 **Basis For Objection:**
INSUFFICIENT DOCUMENTATION

Reason for Proposed Disallowance:
CLAIMANT MUST PROVIDE A FULL COPY OF AN EXECUTED AGREEMENT AND
TRANSACTIONAL DETAIL TO SUPPORT THE BASIS AND AMOUNT OF THE CLAIM.

Claim Data

Case	Claim Number	Claim Date	Total Claim Dollars*	Claim Class**
02-49675	49675-002357	5/20/2003	$47,973.36	(U)

OMNIBUS 20: EXHIBIT B - SAMPLE NOTICE

NOTICE OF FILING OF CFC ESTATE'S TWENTIETH OMNIBUS OBJECTION TO CLAIMS ASSERTED AGAINST THE FINANCE COMPANY DEBTORS (SUBSTANTIVE -- NO LIABILITY)

PLEASE TAKE NOTICE that on or about February 13, 2004, the CFC Estate filed the *CFC Estate's Twentieth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive -- No Liability)* (the "Twentieth 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 Twentieth 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 Twentieth Omnibus Objection together with all Exhibits.
2. Those parties set forth on the 2002 List, as defined in the current Case Management Procedures, will receive service of the Twentieth Omnibus Objection without Exhibits.
3. Each creditor with a Claim or Claims directly affected by the Twentieth Omnibus Objection (each, an "Affected Creditor") will receive service of the Twentieth Omnibus Objection (without exhibits) 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 Twentieth Omnibus Objection, and that **EACH OBJECTION IS AN INDEPENDENT BASIS FOR DISALLOWANCE OF A CLAIM.**

[1] The CFC Estate is the liquidating trust that holds the remaining assets of the Finance Company Debtors for distribution to creditors. The Finance Company Debtors were comprised of 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] The Customized Notice is being provided in lieu of serving the full set of Exhibits. The full set of Exhibits is voluminous. 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.

PLEASE TAKE FURTHER NOTICE that:

1. A hearing on the Twentieth Omnibus Objection will be held before the Honorable Carol A. Doyle, United States Bankruptcy Court, 219 S. Dearborn, Courtroom 742, Chicago, Illinois on **March 17, 2004 at 11:00 a.m.** (the "Claims Hearing").

2. Any party wishing to oppose the relief requested in the Twentieth 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 (i) Kirkland & Ellis LLP, Attn: Thomas J. Augspurger, Kirkland & Ellis LLP, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601, and (ii) Greenberg Traurig, LLP, Attn: Andre Zafrani, 77 West Wacker Drive, Suite 2500, Chicago, Illinois 60601, so as to be received on or before **March 8, 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 **March 8, 2004, at 4:00 p.m., prevailing central time**, the Court will enter an order, similar to the attached form of proposed order, disallowing the Claim(s) as requested in the Twentieth 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 Twentieth 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 Twentieth 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 the CFC Estate continues your matter.

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

8. Any party may obtain a copy of the Twentieth Omnibus Objection with all Exhibits by requesting the same from BMC at (888) 909-0100 (telephone) or by accessing the BMC website at http://www.bmccorp.net/conseco.

9. The CFC Estate reserves the right to object in the future to any of the Claims set out in the Exhibits or the body of the Twentieth Omnibus Objection on any grounds. Separate notice and a hearing will be scheduled for any such objection. **If you have any questions regarding your Claim(s), you should contact Bankruptcy Management Corporation at (888) 909-0100. If you have any questions regarding the Twentieth Omnibus Objection, please call Kirkland & Ellis LLP at (312) 861-2000 extension 9904 and leave a message in the Conseco, Inc. Voicemail box.**

Chicago, Illinois
Dated: February _, 2004

Respectfully submitted,
KIRKLAND & ELLIS LLP

/s/ _____

James H.M. Sprayregen, P.C. (ARDC No. 6190206)
Anup Sathy (ARDC No. 6230191)
Roger J. Higgins (ARDC No. 6257915)
Kirkland & Ellis LLP
200 East Randolph Drive
Chicago, IL 60601-6636
(312) 861-2000 (telephone)
(312) 861-2200 (facsimile)
Counsel for the CFC Estate

*** All responses to objections contained herein should be served upon (1) Kirkland & Ellis LLP, Attn: Thomas J. Augspurger, 200 East Randolph Drive, Suite 6500, Chicago, Illinois 60601 and (2) Greenberg Traurig, LLP, Attn: Andre Zafrani, 77 West Wacker Drive, Suite 2500, Chicago, Illinois 60601.**

EXHIBIT C

CFC ESTATE'S TWENTIETH OMNIBUS OBJECTION
TO CLAIMS ASSERTED AGAINST THE FINANCE COMPANY DEBTORS
(SUBSTANTIVE -- NO LIABILITY)

(Electronic versions of Proofs of Claims will be submitted to Court at future date)

EXHIBIT D

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

In re:	)	**Chapter 11**
	)	
Conseco Finance Corp., et al.,[1]	)	
	)	**Case No. 02 B49675**
Debtors.	)	**Honorable Carol A. Doyle**
	)	**(Jointly Administered)**
	)	
	)	

[PROPOSED] ORDER GRANTING THE RELIEF REQUESTED IN THE CFC ESTATE'S TWENTIETH OMNIBUS OBJECTION TO CLAIMS ASSERTED AGAINST THE FINANCE COMPANY DEBTORS (SUBSTANTIVE -- NO LIABILITY)

Upon hearing of the *CFC Estate's Twentieth Omnibus Objection to Claims Asserted Against the Finance Company Debtors (Substantive -- No Liability)* (the "Twentieth Omnibus Objection") seeking entry of an order disallowing certain claims; no previous application having been made; the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; the Court finding that this is a core proceeding pursuant to 28 U.S.C. § 157 (b)(2); and upon consideration of the Twentieth Omnibus Objection[2] and no responses thereto having been filed or the Court having considered such response; due and proper notice of the Twentieth Omnibus Objection having been given; and the Court having determined that just cause exists for the relief granted herein; it is hereby

ORDERED that the hearing on each Claim listed on **Exhibit 1** to this Order shall be continued to the date specified on **Exhibit 1**, prevailing central time;

[1] The CFC Estate is the liquidating trust that holds the remaining assets of the Finance Company Debtors for distribution to creditors. The Finance Company Debtors were comprised of 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] Capitalized terms not defined herein are as defined in the Twentieth Omnibus Objection.

ORDERED that each Objection listed on **Exhibit 2** to this Order is withdrawn without prejudice to the CFC Estate's right to object in the future to such Claim(s) on any grounds;

ORDERED that each of the No Liability Claims listed on **Exhibit A** to this Order is disallowed for all purposes; and it is further

ORDERED that the CFC Estate reserves the right to object to any Claim listed on any Exhibit to this order for any reason.

Chicago, Illinois
Dated: _____, 2004

_____
Hon. Carol A. Doyle
United States Bankruptcy Judge