

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

In re:

TOTAL FINANCE INVESTMENT INC., *et al.*,<sup>1</sup>  
Debtors.

Chapter 11

Case No. 19-03734 (CAD)

(Joint Administration Requested)

**NOTICE OF MOTIONS AND NOTICE OF HEARING THEREON**

**PLEASE TAKE NOTICE** that on February 13, 2019 Total Finance Investment Inc. and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) filed the following motions (collectively, the “Emergency Motions”):

- Joint Administration. *Debtors’ Motion for Entry of an Order (I) Directing Joint Administration of Related Chapter 11 Cases and (II) Granting Related Relief;*
- Schedules and Statements Extension. *Debtors’ Motion for Entry of an Order (I) Extending the Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs and (II) Granting Related Relief;*
- Case Management. *Debtors’ Motion for Entry of an Order (I) Approving Case Management Procedures, (II) Approving the Notice Thereof, and (III) Granting Related Relief;*
- KCC Retention Application. *Debtors’ Application for Appointment of Kurtzman Carson Consultants LLC as Claims and Noticing Agent for the Debtors Nunc Pro Tunc to the Petition Date;*
- Utilities. *Debtors’ Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers From Altering, Refusing or Discontinuing Utility Service, (II) Determining Adequate Assurance of Payment for Future Service, (III) Establishing Procedures for Determining Adequate Assurance of Payment, and (IV) Granting Related Relief;*

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Total Finance Investment Inc. (3753); Car Outlet Holding Inc. (8362); Car Outlet AC LLC (2282); Full Service Auto Repair AC LLC (6920); Todo Seguro AC LLC (7099); Todo Seguro Premium Finance AC LLC (3775); and Total Finance AC LLC (1965). The Debtors’ mailing address is 3400 N. Pulaski Rd, Chicago, IL 60641.



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- Insurance. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Maintain Their Insurance Policies, and (B) Honor All Insurance Obligations, (II) Modifying the Automatic Stay, to the Extent Necessary and (II) Granting Related Relief;
- Taxes. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees, (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief;
- Cash Management. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Using Their Existing Cash Management System, Including Existing Bank Accounts, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Continue Interdebtor Transactions, and (D) Maintain Existing Business Forms and (II) Granting Related Relief;
- Employee Wages. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Commissions, Bonuses, Employee Benefits, Prepetition Payroll Taxes, and Other Obligations and (B) Maintain Compensation and Benefits Programs and Pay Related Administrative Obligations, (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief;
- Lien Claimants. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of Certain Lien Claimants and (II) Granting Related Relief;
- Customer Programs. Debtors' Motion for Entry of Interim and Final Orders Authorizing Debtors to (I) Maintain and Administer Prepetition Customer Programs and Practices, (II) Pay and Honor Related Prepetition and Post Petition Obligations, (III) Pay and Honor Credit Card Chargebacks and Processing Fees, and (IV) Granting Related Relief;
- DIP Financing and Cash Collateral. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing (A) Secured Post-Petition Financing on a Super-Priority Basis Pursuant to 11 U.S.C. § 364, (B) Use of Cash Collateral Pursuant to 11 U.S.C. § 363 and (C) Grant of Adequate Protection Pursuant to 11 U.S.C. §§ 363 and 364, (II) Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001(c), and (III) Granting Related Relief.

**PLEASE TAKE FURTHER NOTICE** that a hearing on each of the Emergency Motions will be held on Thursday February 14, 2019 at 10:30 a.m. CT, before the Honorable Carol A. Doyle of the United States Bankruptcy Court for the Northern District of Illinois, or any other judge sitting in her place and stead, at Courtroom 742 in the Dirksen Federal Building, 219 S. Dearborn Street,

Chicago, Illinois 60604. The Emergency Motions may be opposed on the basis that emergency relief is not appropriate.

**PLEASE TAKE FURTHER NOTICE** that hearing dates and times as well as copies of all documents are available for free of charge by visiting the case website maintained by Debtors' proposed notice and claims agent, Kurtzman Carson Consultants LLC, available at <http://kccllc.net/totalfinance>. You may also obtain copies of any pleadings by visiting the Court's website at [www.ilnb.uscourts.gov](http://www.ilnb.uscourts.gov) in accordance with the procedures and fees set forth therein.

SIDLEY AUSTIN LLP

*/s/ Bojan Guzina*

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PROPOSED ATTORNEYS FOR THE  
DEBTORS AND DEBTORS IN POSSESSION