

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

In re: TOTAL FINANCE INVESTMENT INC., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 19-03734 (CAD) (Joint Administration Requested)
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AGENDA FOR FIRST DAY HEARING

Time and Date of Hearing: February 14, 2019, at 10:30 a.m. (Central Time)

Location of Hearing: The Honorable Carol A. Doyle
Courtroom No. 872
United States Bankruptcy Court for the Northern District of Illinois 219
S. Dearborn Street Chicago, Illinois 60604

Copies of Motions: A copy of each pleading can be viewed on the Court's website at www.ilnb.uscourts.gov and at the website of the Debtors' proposed notice and claims agent, KCC LLC ("KCC"), at <https://kccllc.com/totalfinance>.

I. Introduction

1. ***First Day Declaration.*** Declaration Of Andrew Deluca In Support Of The Debtors' Chapter 11 Petitions And First Day Pleadings [Docket No. 19]

II. Matters Requested to Be Heard at First Day Hearing

1. **Joint Administration.** *Debtors' Motion for Entry of an Order (I) Directing Joint Administration of Related Chapter 11 Cases and (II) Granting Related Relief [Docket No. 6]*

Status: A proposed Order will be presented to the Court.

¹ 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.



2. **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 [Docket No. 7]*

Status: A proposed Order will be presented to the Court.

3. **Case Management.** *Debtors' Motion for Entry of an Order (I) Approving Case Management Procedures, (II) Approving the Notice Thereof, and (III) Granting Related Relief [Docket No. 8]*

Status: A proposed Order will be presented to the Court.

4. **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 [Docket No. 9]*

Status: A proposed Order will be presented to the Court.

5. **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 [Docket No. 10]*

Status: A proposed interim order will be presented to the Court. This matter will be heard on a final basis at a later hearing to be scheduled by the Court, at which time a proposed final order will be presented to the Court.

6. **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 [Docket No. 11].*

Status: A proposed interim order will be presented to the Court. This matter will be heard on a final basis at a later hearing to be scheduled by the Court, at which time a proposed final order will be presented to the Court.

7. **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 [Docket No. 12]

Status: A proposed interim order will be presented to the Court. This matter will be heard on a final basis at a later hearing to be scheduled by the Court, at which time a proposed final order will be presented to the Court.

8. **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 [Docket No. 13]*

Status: A proposed interim order will be presented to the Court. This matter will be heard on a final basis at a later hearing to be scheduled by the Court, at which time a proposed final order will be presented to the Court.

9. **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 [Docket No. 14]*

Status: A proposed interim order will be presented to the Court. This matter will be heard on a final basis at a later hearing to be scheduled by the Court, at which time a proposed final order will be presented to the Court.

10. **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 [Docket No. 15]*

Status: A proposed interim order will be presented to the Court. This matter will be heard on a final basis at a later hearing to be scheduled by the Court, at which time a proposed final order will be presented to the Court.

11. **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 [Docket No. 16]*

Status: A proposed interim order will be presented to the Court. This matter will be heard on a final basis at a later hearing to be scheduled by the Court, at which time a proposed final order will be presented to the Court.

12. **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 [Docket No. 18]*

Status: A proposed interim order will be presented to the Court. This matter will be heard on a final basis at a later hearing to be scheduled by the Court, at which time a proposed final order will be presented to the Court.

III. Matters the Debtors Request that the Court Hear at a Later Hearing

The Debtors are *not* requesting that the following matters be heard on a final basis at this hearing. The Debtors request that a later hearing be scheduled to hear these matters on a final basis.

1. **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 [Docket No. 10]*
2. **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 [Docket No. 11]*
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PROPOSED ATTORNEYS FOR THE
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