

**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)

Jointly Administered

**AMENDED AGENDA FOR HEARING**

Time and Date of Hearing: March 7, 2019, at 11:00 a.m. (Central Time)

Location of Hearing: The Honorable Carol A. Doyle  
Courtroom No. 742  
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](http://www.ilnb.uscourts.gov) and at the website of the Debtors' notice and claims agent, KCC LLC ("KCC"), at <https://kccllc.net/totalfinance>.

**UNCONTESTED MATTERS**

1. **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]

**Related Documents:**

- A. *Proposed* Interim Order Regarding Insurance [Docket No. 61]
- B. Interim Order Regarding Insurance [Docket No. 67]
- C. *Proposed* Final Order Regarding Insurance [Docket No. 153]

**Status:** A proposed final order will be presented to the Court.

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<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.



2. **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]

**Related Documents:**

- A. *Proposed* Interim Order Regarding Taxes [Docket No. 36]
- B. Interim Order Regarding Taxes [Docket No. 39]
- C. *Proposed* Interim Order Regarding Taxes [Docket No. 63]
- D. Interim Order Regarding Taxes [Docket No. 69]
- E. *Proposed* Final Order Regarding Taxes [Docket No. 154]

**Status:** A proposed final order will be presented to the Court.

3. **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]

**Related Documents:**

- A. *Proposed* Interim Order Regarding Lien Claimants [Docket No. 35]
- B. Interim Order Regarding Lien Claimants [Docket No. 46]
- C. *Proposed* Interim Order Regarding Lien Claimants [Docket No. 62]
- D. Interim Order Regarding Lien Claimants [Docket No. 71]
- E. *Proposed* Final Order Regarding Lien Claimants [Docket No. 155]

**Status:** A proposed final order will be presented to the Court.

4. **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]

**Related Documents:**

- A. Interim Order Regarding Cash Management [Docket No. 41]
- B. *Proposed* Final Order Regarding Cash Management [Docket No. 156]

**Status:** A proposed final order will be presented to the Court.

- 5. ***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]

**Related Documents:**

- A. Interim Order Regarding Employee Wages [Docket No. 44]
- B. *Proposed* Final Order Regarding Employee Wages [Docket No. 157]

**Status:** A proposed final order will be presented to the Court.

- 6. ***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]

**Related Documents:**

- A. Interim Order Regarding Customer Programs [Docket No. 48]
- B. *Proposed* Final Order Regarding Customer Programs [Docket No. 158]

**Status:** A proposed final order will be presented to the Court.

**RESOLVED MATTERS**

- 7. ***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]

**Related Documents:**

- A. *Proposed* Interim Order Regarding Utilities [Docket No. 64]
- B. Interim Order Regarding Utilities [Docket No. 65]
- C. Objection of Constellation NewEnergy, Inc. and Commonwealth Edison Company [Docket No. 137]
- D. *Proposed* Final Order Regarding Utilities [Docket No. 159]
- E. Withdrawal of Objection of Constellation NewEnergy, Inc. and Commonwealth Edison Company [Docket No. 162]
- F. *Revised Proposed* Final Order Regarding Utilities [Docket No. 165]

**Status:** A proposed final order will be presented to the Court.

**MATTERS GOING FORWARD**

- 8. ***Eligibility for Sales Tax Credit Memos.*** Debtors' Motion for Entry of an Order, Pursuant to 11 U.S.C. §§ 105(a) and 505 and 28 U.S.C. § 1334, (I) Determining the Debtors' Entitlement to Certain Illinois Sales Tax Credits and (II) Granting Related Relief [Docket No. 23]

**Related Documents:** None

**Status:** A proposed briefing and hearing schedule agreed by the Debtors and the IDOR will be presented to the Court.

**CONTINUED MATTERS**

- 9. ***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]

**Related Documents:**

- A. Declaration of Stuart Kaufman in support of DIP Financing and Cash Collateral [Docket No. 19]

- B. *Proposed* Interim Order Regarding DIP Financing and Cash Collateral [Docket No. 34]
- C. Interim Order Regarding DIP Financing and Cash Collateral [Docket No. 50]

**Status:** This matter is continued to the March 14, 2019 omnibus hearing.

Dated: March 6, 2019  
Chicago, Illinois

SIDLEY AUSTIN LLP

*/s/ Bojan Guzina*

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Bojan Guzina (ARDC #6277585)  
Jackson T. Garvey (ARDC #6320652)  
One South Dearborn Street  
Chicago, Illinois 60603  
Telephone: (312) 853-7000  
Facsimile: (312) 853-7036

PROPOSED ATTORNEYS FOR THE  
DEBTORS AND DEBTORS IN POSSESSION