

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

In re:

TOTAL FINANCE INVESTMENT INC., *et al.*,¹
Debtors.

Chapter 11

Case No. 19-03734 (CAD)

Jointly Administered

AMENDED AGENDA FOR HEARING

Time and Date of Hearing: June 27, 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 and at the website of the Debtors' notice and claims agent, KCC LLC ("KCC"), at <https://kccllc.net/totalfinance>.

PLAN CONFIRMATION

1. ***Chapter 11 Plan.*** Second Amended Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and its Debtor Affiliates [Docket No. 471]

Related Documents:

Proposed Order

- A. Proposed Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and Its Debtor Affiliates [Docket No. 487] (the "Proposed Confirmation Order")

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.



Previously Filed Plans

- B. Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and its Debtor Affiliates [Docket No. 231]
- C. First Amended Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and its Debtor Affiliates [Docket No. 321]
- D. Revised First Amended Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and its Debtor Affiliates [Docket No. 348]

Plan Supplement Documents

- A. Supplement to Debtors' First Amended Joint Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code [Docket 433]
- B. Revised Exhibits to the Plan Supplement [Docket 473]

Disclosure Statement

- A. Disclosure Statement for the Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and its Debtor Affiliates [Docket No. 232]
- B. Exhibits to Disclosure Statement for the Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and Its Debtor Affiliates [Docket No. 306]
- C. Disclosure Statement for the First Amended Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and its Debtor Affiliates [Docket No. 329]
- D. Revised Disclosure Statement for the First Amended Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and its Debtor Affiliates [Docket No. 349]

Orders Related to Disclosure Statement and Solicitation

- A. Order (I) Approving (A) the Adequacy of the Disclosure Statement and (B) the Solicitation and Voting Procedures, (II) Scheduling Certain Dates with Respect to Plan Confirmation, and (III) Granting Related Relief [Docket No. 351]

Voting Report

- A. Declaration of P. Joseph Morrow IV of Kurtzman Carson Consultants LLC Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First

Amended Joint Chapter 11 Plan of Reorganization Pursuant to Chapter 11 for Total Finance Investment Inc. and its Debtor Affiliates [Docket No. 484]

Confirmation Brief and Factual Support

- A. Debtors' Memorandum of Law in Support of Entry of an Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and Its Debtor Affiliates [Docket No. 485]
- B. Declaration of Patrick O'Malley in Support of Second Amended Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and its Debtor Affiliates [Docket No. 486]

Objection

- A. United States Trustee's Limited Objection to Confirmation of the Plan of Reorganization of Total Finance Investment Inc. Under Chapter 11 of the Bankruptcy Code [Docket No. 448]

Status: The Proposed Confirmation Order will be presented to the Court.

UNCONTESTED MATTERS

- 2. ***Motion to Reject Leases.*** Debtors' Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to (A) Reject Certain Unexpired Leases of Nonresidential Real Property and (B) Abandon Certain Personal Property in Connection Therewith and (II) Granting Related Relief [Docket No. 454]

Related Document: Certification of No Objection [Docket No. 498]

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

MATTERS TO BE CONTINUED

- 3. ***Objection to Impact Networking Claims.*** Debtors' Objection to Proofs of Claim Nos. 55 & 58 Filed by Impact Networking, Inc. Against Debtors Total Finance AC LLC and Car Outlet AC LLC [Docket No. 417]

Related Documents: None

Status: The matter will be continued.

4. ***Objection to Ramirez Claim.*** Debtors' Objection to Proof of Claim No. 67 Filed by Carolina Lopez Ramirez Against Debtor Total Finance AC LLC [Docket No. 418]

Related Documents: None

Status: The matter will be continued.

5. ***Objection to Daniels Claim #53.*** Debtors' Objection to Proof of Claim No. 53 Filed by Reginald Daniels Against Debtor Car Outlet AC LLC [Docket No. 419]

Related Documents: None

Status: The matter will be continued.

6. ***Objection to Daniels Claim #88.*** Debtors' Objection to Proof of Claim No. 53 Filed by Reginald Daniels Against Debtor Car Outlet AC LLC [Docket No. 420]

Related Documents: None

Status: The matter will be continued.

7. ***Objection to Poliszczuk Claim.*** Debtors' Objection to Proof of Claim No. 38 Filed by Charles Poliszczuk Against Debtor Car Outlet AC LLC [Docket No. 421]

Related Documents: None

Status: The matter will be continued.

ADVERSARY PROCEEDINGS

8. ***Debtors' Adversary Proceeding Complaint.*** Adversary Proceeding Complaint filed by Total Finance Investment Inc. and Car Outlet Holding Inc. Against Charles Serlin and Howard Stillman (Case No. 19-00098) [Docket No. 1]

Related Documents: None

Status: The Court will hold a status hearing.

9. ***Poliszczuk v. Colorado Outlet, Inc. et al.*** (Case No. 19-00717) [Docket No. 1]

Related Documents: None

Status: The Court will hold a status hearing.

10. ***Committee's Adversary Proceeding Complaint.*** Adversary Proceeding Complaint filed by The Official Committee of Unsecured Creditors of Total Finance Investment Inc. against BMO Harris Bank, N.A. (Case No. 19-00720) [Docket No. 1]

Related Documents: None

Status: The Court will hold a status hearing.

Dated: June 25, 2019
Chicago, Illinois

SIDLEY AUSTIN LLP

/s/ Bojan Guzina

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