

**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>  
Reorganized Debtors.

Chapter 11

Case No. 19-03734 (CAD)

Jointly Administered

**AMENDED AGENDA FOR HEARING**

Time and Date of Hearing: July 18, 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 MATTER**

1. ***Lease Rejection Motion.*** Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to (A) Reject That Certain Unexpired Lease of Nonresidential Real Property Located at 3400 North Pulaski Road in Chicago and (B) Abandon Certain Personal Property in Connection Therewith and (II) Granting Related Relief [Docket No. 508]

**Related Documents:** None

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

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<sup>1</sup> The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized 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 Reorganized Debtors' mailing address is 3015 W. Irving Park Rd, Chicago, IL 60618.



## **MATTERS GOING FORWARD**

2. ***IDOR's Motion for Reconsideration.*** Motion of Illinois Department of Revenue Pursuant to Rule 9023 of the Federal Rules of Bankruptcy Procedure for a New Trial or to Alter or Amend the Order Granting Debtors' Motion for Entry of an Order Determining Debtors' Entitlement to Certain Illinois Sales Tax Credits [Docket No. 494]

### **Related Documents:**

- A. Debtors' Objection to the Motion of the Illinois Department of Revenue Pursuant to Rule 9023 of the Federal Rules of Bankruptcy Procedure for a New Trial or to Alter or Amend the Order Determining Debtors' Entitlement to Certain Illinois Sales Tax Credits [Docket No. 519]
- B. Objection of the Official Committee of Unsecured Creditors to Motion of Illinois Department of Revenue Pursuant to Rule 9023 of the Federal Rules of Bankruptcy Procedure for a New Trial or to Alter or Amend the Order Granting Debtors' Motion for Entry of an Order Determining Debtors' Entitlement to Certain Illinois Sales Tax Credits [Docket No. 520]
- C. Illinois Department Of Revenue's Reply To The Objections Of The Debtors And The Official Committee Of Unsecured Creditors To Its Motion Under Rule 9023 Of The Federal Rules Of Bankruptcy Procedure For A New Trial Or To Alter Or Amend The Order Granting Debtors' Motion For Entry Of An Order Determining Debtors' Entitlement To Certain Illinois Sales Tax Credits [Docket No. 539]

**Status:** This matter is going forward.

## **CLAIMS OBJECTIONS**

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

**Related Document:** Proposed Agreed Order Resolving Debtors' Objection to Proof of Claim No. 38 Filed by Charles Poliszczuk Against Debtor Car Outlet AC LLC [Docket No. 541]

**Status:** The parties will present an agreed proposed Order.

4. ***Objections to Claims of Reginald Daniels.*** Debtors' Objection to Proof of Claim No. 53 Filed by Reginald Daniels Against Debtor Car Outlet AC LLC [Docket No. 419] & Debtors' Objection to Proof of Claim No. 88 Filed by Reginald Daniels Against Debtor Total Finance AC LLC [Docket No. 420]

**Related Documents:**

- A. Reginald Daniels' Response in Opposition to Debtors' Objection to Proof of Claim No. 53 Against Debtor Car Outlet AC LLC [Docket No. 534] and Reginald Daniels' Response in Opposition to Debtors' Objection to Proof of Claim No. 88 Against Debtor Total Finance AC LLC [Docket No. 535].
- B. Proposed Agreed Order Resolving Debtors' Objections to Proofs of Claims Filed By Reginald Daniels [Docket No. 540]

**Status:** The parties will present an agreed proposed Order.

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

**Related Document:** Carolina Lopez Ramirez' Response to Debtors' Objection to Proof of Claim No. 67 Filed by Carolina Lopez Ramirez Against Debtor Total Finance AC LLC [Docket No. 526]

**Status:** The parties will request adjournment of this issue to the August 15, 2019 Omnibus Hearing.

6. ***Objection to Claims of Daisy Sanchez.*** Debtors' Objection to Proofs of Claim Nos. 29 & 30 Filed by Daisy Sanchez Against Debtors Total Finance AC LLC and Car Outlet AC LLC [Docket No. 435]

**Related Document:** Creditor Daisy Sanchez' Response to Debtors' Objection to Her Proofs of Claim Nos. 29 & 30 Against Debtors Total Finance AC LLC and Car Outlet AC LLC [Docket No. 526]

**Status:** The parties will request adjournment of this issue to the August 15, 2019 Omnibus Hearing.

7. ***Objection to Claims of Impact Networking.*** 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 parties will request adjournment of this issue to the August 15, 2019 Omnibus Hearing.

**INTERIM FEE APPLICATIONS**

8. ***Mayer Brown LLP.*** First Interim Application of Mayer Brown LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Special Tax Claims Counsel for the Debtors and Debtors in Possession for the Period Covering the Petition Date through April 30, 2019 [Docket No. 450].

**Related Documents:**

- A. Proposed Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered [Docket No. 467]
- B. Certificate of No Objection [Docket No. 531]

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

9. ***Sidley Austin LLP.*** First Interim Fee Application of Sidley Austin LLP for Allowance of Compensation for the Period From February 13, 2019 to April 30, 2019 [Docket No. 459]

**Related Documents:**

- A. Proposed Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered [Docket No. 467]
- B. Certificate of No Objection [Docket No. 531]

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

10. ***Togut, Segal & Segal LLP.*** First Interim Fee Application of Togut, Segal & Segal LLP for Allowance of Compensation for the Period From February 13, 2019 to April 30, 2019 [Docket No. 460]

**Related Documents:**

- A. Proposed Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered [Docket No. 467]
- B. Certificate of No Objection [Docket No. 531]

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

11. ***Portage Point Partners, LLC.*** First Interim Fee Application of Portage Point Partners, LLC for Compensation Earned and Expenses Incurred as Financial Advisor to the Debtors and Debtors in Possession for the Period From February 13, 2019 to and Including April 30, 2019 [Docket No. 461]

**Related Documents:**

- A. Proposed Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered [Docket No. 467]
- B. Certificate of No Objection [Docket No. 531]

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

12. ***KCC LLC.*** First Interim Fee Application Of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors and Debtors in Possession, for the Period from February 13, 2019 Through and Including April 30, 2019 [Docket No. 462]

**Related Documents:**

- A. Proposed Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered [Docket No. 467]
- B. Certificate of No Objection [Docket No. 531]

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

13. ***Freeborn & Peters LLP.*** First Interim Fee Application of Freeborn & Peters LLP as Counsel to the Official Committee of Unsecured Creditors [Docket No. 457]

**Related Documents:** None

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

### **PLAN CONFIRMATION**

14. ***Debtors' Plan of Confirmation.*** Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and its Debtor Affiliates (the "Plan") [Docket No. 501]

**Related Document:** Notice of Occurrence of the Effective Date of the Second Amended Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and its Debtor Affiliates [Docket No. 524]

**Status:** The Reorganized Debtors will provide the Court an update on the status of the Plan.

### **ADVERSARY PROCEEDINGS**

15. ***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 Document:** Plaintiff's Notice of Dismissal (Case No. 19-00098) [Docket No. 11]

**Status:** The Court will hold a status hearing.

16. ***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.

17. ***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 Document:** Notice of Voluntary Dismissal filed by the Official Committee of Unsecured Creditors [Docket No. 8]

**Status:** The Court will hold a status hearing.

Dated: July 17, 2019  
Chicago, Illinois

SIDLEY AUSTIN LLP

*/s/ Bojan Guzina*

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