

**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

**AGENDA FOR HEARING**

Time and Date of Hearing: November 14, 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. ***Final Fee Application of Freeborn & Peters LLP.*** Second and Final Fee Application of Freeborn & Peters LLP as Counsel to the Official Committee of Unsecured Creditors [Docket No. 604]

**Related Documents:**

- A. Certificate of No Objection [Docket No. 630].
- B. Amended Group Exhibit 3 to the Second and Final Fee Application of Freeborn & Peters LLP as Counsel to the Official Committee of Unsecured Creditors [Docket No. 645].

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

<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.



2. ***Motion for Stay Pending Appeal.*** Motion of Illinois Department of Revenue Pursuant to Rule 8007 of the Federal Rules of Bankruptcy Procedure for a Stay Pending Appeal of the Order Granting Debtors' Motion for Entry of an Order Determining Debtors' Entitlement to Certain Illinois Sales Tax Credits [Docket No. 625].

**Related Documents:**

- A. Proposed Agreed Order Granting Motion of Illinois Department of Revenue Pursuant to Rule 8007 of the Federal Rules of Bankruptcy Procedure for a Stay Pending Appeal of the Order Granting Debtors' Motion for Entry of an Order Determining Debtors' Entitlement to Certain Illinois Sales Tax Credits [Docket No. 663].
- B. Certificate of No Objection [Docket No. 670].

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

**CONTESTED MATTERS**

3. ***Motion to Vacate Order Denying Impact Networking Claims.*** Motion to Vacate Order Denying Proof of Claims filed by Impact Networking, LLC [Docket No. 648].

**Related Documents:**

- A. Order Sustaining Debtors' Objection to Proofs of Claim Nos. 55 & 58 Filed by Impact Networking, LLC Against Debtors Total Finance Investment LLC and Car Outlet AC LLC [Docket No. 613]
- B. Reorganized Debtors' Objection to the Motion to Vacate Order Denying Proofs of Claim Filed by Impact Networking, LLC [Docket No. 669].

**Status:** This matter will go forward.

**CLAIMS OBJECTIONS**

**Resolved Matters**

4. ***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. 522]

**Status:** This matter has been resolved consensually, and the Debtors will request that the claim objection be denied as moot.

5. ***Objection to Claim of Christopher Beaudoin.*** Reorganized Debtors' Objection to Proof of Claim No. 9 Filed by Christopher Beaudoin Against Debtor Total Finance AC LLC [Docket No. 650]

**Related Documents:** None

**Status:** This matter has been resolved consensually, and the Debtors will request that the claim objection be denied as moot.

6. ***Objection to Claim of Tomeka Hicks.*** Reorganized Debtors' Objection to Proof of Claim No. 10 Filed by Tomeka Hicks Against Debtor Total Finance AC LLC [Docket No. 652]

**Related Documents:** None

**Status:** This matter has been resolved consensually, and the Debtors will request that the claim objection be denied as moot.

#### **Uncontested Matters**

7. ***Objection to Claims of Sasan Jalili.*** Reorganized Debtors' Omnibus Objection to Proofs of Claim Nos. 22, 24, and 25 Filed by Sasan Jalili Against Debtors Total Finance AC LLC and Full Service Auto Repair AC LLC [Docket No. 653]

**Related Documents:** Certificate of No Objection [Docket No. 671]

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

8. ***Objection to Claim of Luis Murillo and Azucena Tapia Escutia.*** Reorganized Debtors' Objection to Proof of Claim No. 40 Filed by Luis Murillo and Azucena Tapia Escutia Against Debtor Car Outlet AC LLC [Docket No. 654]

**Related Documents:** Certificate of No Objection [Docket No. 671]

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

9. ***Objection to Claim of Pro Finish.*** Reorganized Debtors' Objection to Proof of Claim No. 18 Filed by Pro Finish Against Debtor Full Service Auto Repair AC LLC [Docket No. 655]

**Related Documents:** Certificate of No Objection [Docket No. 671]

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

10. ***Objection to Claim of Roadside Auto.*** Reorganized Debtors' Objection to Proof of Claim No. 37 Filed by Roadside Auto Truck Transport, Inc. Against Debtor Car Outlet AC LLC [Docket No. 656]

**Related Documents:** Certificate of No Objection [Docket No. 671]

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

11. ***First Omnibus Non-Substantive Claims Objection.*** Reorganized Debtors' First Omnibus Non-Substantive Objection to Certain Proofs of Claim (Amended Claims and Late-Filed Claims) [Docket No. 658]

**Related Documents:** Certificate of No Objection [Docket No. 671]

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

#### **Matters to be Continued**

12. ***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 Reorganized Debtors will request a continuance of this matter to the December 18, 2019 Omnibus Hearing.

13. ***Objection to Claim of Rhonisha Hamilton.*** Reorganized Debtors' Objection to Proof of Claim No. 11 Filed by Rhonisha Hamilton Against Debtor Total Finance AC LLC [Docket No. 651]

**Related Documents:** None

**Status:** The Reorganized Debtors will request a continuance of this matter to the December 18, 2019 Omnibus Hearing.

Dated: November 12, 2019  
Chicago, Illinois

SIDLEY AUSTIN LLP

/s/ Bojan Guzina

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