

**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

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that on **January 23, 2020 at 11:00 a.m.**, or as soon thereafter as counsel may be heard, we will appear before the Honorable Carol A. Doyle, or any judge sitting in her stead, in Room 742 of the Everett McKinley Dirksen Building, 219 South Dearborn Street, Chicago Illinois 60604, and then and there present the *Reorganized Debtors' Motion for Entry of a Final Decree Closing Certain Cases and Amending the Case Caption* (the "Motion"), a copy of which is hereby served upon you. An order approving the Motion may be entered without a hearing unless an objection is timely filed and served.

**PLEASE TAKE FURTHER NOTICE** that any objection to the Motion must be filed with the Court by **January 16, 2020, at 4:00 p.m. (prevailing Central Time)** and served so to be actually received before such deadline by: (a) counsel to the Reorganized Debtors; (b) the Office of the United States Trustee for the Northern District of Illinois; and (c) any party that has requested notice pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure, a schedule of such parties may be found at <http://www.kccllc.net/totalfinance>.

**PLEASE TAKE FURTHER NOTICE** that copies of the Motion and all documents filed in these chapter 11 cases are available free of charge by visiting <http://www.kccllc.net/totalfinance>. You may also obtain copies of any pleadings by visiting the Court's website at <http://www.ilnb.uscourts.gov> in accordance with the procedures and fees set forth therein.

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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, Chicago, IL 60618.



190373420010900000000005

Dated: January 9, 2020  
Chicago, Illinois

SIDLEY AUSTIN LLP

/s/ Bojan Guzina

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ATTORNEYS FOR THE REORGANIZED DEBTORS

**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

**REORGANIZED DEBTORS' MOTION FOR ENTRY OF A FINAL  
DECREE CLOSING CERTAIN CASES AND AMENDING THE CASE CAPTION**

The reorganized debtors and debtors-in-possession in the above-captioned chapter 11 cases (the “Reorganized Debtors” and, prior to the effective date of their confirmed chapter 11 plan of reorganization, the “Debtors”) hereby submit this motion (the “Motion”)<sup>2</sup> for entry of a final decree, substantially in the form attached hereto as **Exhibit A** (the “Proposed Final Decree”), pursuant to sections 105(a) and 350(a) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), rule 3022 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rule 3022-1 of the Local Rules for the United States Bankruptcy Court for the Northern District of Illinois (the “Local Rules”), (i) closing the chapter 11 cases of the Reorganized Debtors other than the case of Car Outlet AC LLC (Case No. 19-03740) (the case of Car Outlet AC LLC, the “Remaining Case,” and all other jointly administered cases, the “Closing Cases”); (ii) providing that, subsequent to the entry of the Proposed Final Decree, any pending or future matters regarding the Closing Cases shall be addressed in the Remaining Case;

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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, Chicago, IL 60618.

<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Plan (as defined herein), unless the context indicates otherwise.

and (iii) amending the caption of the Remaining Case. In support of this Motion, the Reorganized Debtors respectfully state as follows:

**JURISDICTION AND VENUE**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Debtors confirm their consent to the entry of a final order or judgment by the Court in connection with this Motion if it is determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested in this Motion are sections 105(a) and 350(a) of the Bankruptcy Code, rule 3022 of the Bankruptcy Rules, and rule 3022-1 of the Local Rules.

**STATUS OF THE CASES**

4. On February 13, 2019 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. On February 14, 2019, the Court entered an order [Docket No. 32] authorizing the joint administration and procedural consolidation of these chapter 11 cases pursuant to Bankruptcy Rule 1015(b). On February 22, 2019, the United States Trustee for the Northern District of Illinois (the “U.S. Trustee”) appointed an official committee of unsecured creditors (the “Committee”) pursuant to section 1102 of the Bankruptcy Code [Docket No. 78]. No request has been made for the appointment of a trustee or examiner.

5. On March 29, 2019, the Debtors filed their statements of financial affairs [Docket Nos. 251-257] (the “Statements”). On March 30, 2019, the Debtors filed their schedules of assets and liabilities [Docket Nos. 258-264] (the “Schedules”). On May 1, 2019, the Debtors filed amended schedules of assets and liabilities [Docket Nos. 356-362] (the “Amended Schedules” and, collectively with the Schedules and the Statements, the “Schedules and Statements”).

6. On June 27, 2019, the Court entered the *Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization for Total Finance Investment Inc. and Its Debtor Affiliates* [D.I. 501] (the “Confirmation Order”). The plan of reorganization as confirmed by the Confirmation Order and attached thereto as Exhibit A is referred to herein as the “Plan.”

7. The Effective Date of the Plan occurred on July 12, 2019. See Docket No. 524.

8. The Reorganized Debtors have substantially consummated the Plan, and all distributions required to be made thereunder have been made or will be made in accordance with the terms of the Plan.

9. As contemplated and required by the Plan and the Confirmation Order, all documents and agreements necessary to implement the Plan were executed in accordance with the terms of the Plan and the Confirmation Order.

10. More than 125 Proofs of Claim have been filed in these chapter 11 cases, each of which the Reorganized Debtors have addressed through allowance, negotiation, or the claims objection process. The Debtors and Reorganized Debtors have filed thirteen (13) substantive claim objections and one (1) omnibus non-substantive claim objection in an effort to resolve all the Proofs of Claim filed against the Debtors’ estates. As of the filing of this Motion, all of the

Debtors' claim objections have been resolved either by an order of the Court, or consensually, as permitted by the Plan. See Plan Art. VII.<sup>3</sup>

11. The Reorganized Debtors have identified an additional 55 Proofs of Claim and/or amounts scheduled on the Schedules and Statements which the Debtors have satisfied during the course of the chapter 11 cases of the Reorganized Debtors or the period following the Effective Date, but which were not resolved pursuant to allowance and distributions under the Plan, an order of this Court, and/or a documented settlement agreement between the Reorganized Debtors and the respective claimants. The Reorganized Debtors satisfied these Proofs of Claim and scheduled amounts (collectively, the "Satisfied Claims") (i) in the ordinary course of business in accordance with the Bankruptcy Code, Bankruptcy Rules, and Local Rules, (ii) pursuant to "first-day" and "second-day" orders entered by this Court, or (iii) pursuant to the Plan. The Reorganized Debtors have included the Satisfied Claims on the *Notice of Satisfaction of Claims* (the "Notice of Satisfaction"), filed contemporaneously with this Motion. All holders of Satisfied Claims will be sent the Notice of Satisfaction such that they can respond should they dispute the Reorganized Debtors' determination of the status of their claim. The Reorganized Debtors will provide the Court a status update as to any responses received to the Notice of Satisfaction at the hearing on this Motion.

12. On the Petition Date, the Debtors filed a motion [Docket No. 23] (the "Sales Tax Motion") seeking the Court's determination of the entitlement of Debtor Car Outlet AC LLC ("Car Outlet AC") and non-Debtor Colorado Outlet, Inc. (f/k/a Car Outlet, Inc.) to certain sales

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<sup>3</sup> While the Debtors' objection to the proof of claim of Carolina Lopez Ramirez [Docket No. 418] (the "Lopez Ramirez Claims Objection") remains pending as of the date of this Motion, that objection has been resolved consensually by the Reorganized Debtors and Ms. Lopez Ramirez pursuant to Article VII of the Plan. The Reorganized Debtors filed a notice of withdrawal of the Lopez Ramirez Claims Objection as moot concurrently with this Motion.

tax credits from the Illinois Department of Revenue (the “IDOR”). The Court entered an order granting the Sales Tax Motion on June 11, 2019 [Docket No. 442] (the “Sales Tax Order”). On July 11, 2019, the IDOR filed a motion to reconsider the Sales Tax Order [Docket No. 519], which the Court denied on September 12, 2019 [Docket No. 614]. On September 26, 2019, the IDOR filed an notice of appeal of the Sales Tax Order [Docket No. 626] to the United States District Court for the Northern District of Illinois (the “District Court”), thereby initiating an appeal of the Sales Tax Order (the “Sales Tax Appeal”). The IDOR filed its opening brief in the Sales Tax Appeal on December 16, 2019. The Reorganized Debtors’ brief is due February 7, 2020, and the IDOR’s reply is due February 28, 2020.

13. Other than this Motion, no motions, contested matters, or adversary proceedings are pending in the Closing Cases.<sup>4</sup> The Reorganized Debtors will pay all quarterly fees owed to the U.S. Trustee, if any, as soon as reasonably practicable following entry of the Final Decree. The Reorganized Debtors do not believe that they owe any money to the Clerk of the Court as of the date hereof. Subject to the possibility that certain matters may be remanded to the Court for further proceedings in connection with the Sales Tax Appeal, the Court’s role in the administration of the Closing Cases is complete.

### **RELIEF REQUESTED**

14. By this Motion, the Reorganized Debtors request entry of the Proposed Final Decree, substantially in the form attached hereto as **Exhibit A**, (i) closing the Closing Cases and leaving open the Remaining Case; (ii) providing that, subsequent to the entry of the Proposed Final Decree, any pending or future matters regarding the Closing Cases shall be addressed in the

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<sup>4</sup> While it is possible that the Sales Tax Appeal could result in a remand of certain proceedings to the Court, as of the date of this Motion there are no matters relating to the Sales Tax Motion pending before the Court.

Remaining Case; and (iii) amending the caption of the Remaining Case. The Reorganized Debtors propose that the revised caption for the Remaining Case provide as follows:

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

In re:

CAR OUTLET AC LLC<sup>1</sup>

Reorganized Debtor.

Chapter 11

Case No. 19-03740 (CAD)

<sup>1</sup> The last four digits of the Reorganized Debtor's federal tax identification number are 2282. The Reorganized Debtor's mailing address is 3015 W. Irving Park Road, Chicago, IL 60618. The chapter 11 cases of certain affiliates of the Reorganized Debtor have been closed. See Docket No. [\_\_\_].

**BASIS FOR RELIEF**

15. Section 350(a) of the Bankruptcy Code provides that “[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case.” Bankruptcy Rule 3022, which implements section 350 of the Bankruptcy Code, provides that “[a]fter an estate is fully administered in a chapter 11 reorganization case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case.”

16. The Advisory Committee Notes to Bankruptcy Rule 3022 (the “Advisory Committee Notes”) state that “[e]ntry of a final decree closing a chapter 11 case should not be delayed solely because the payments required by a plan have not been completed.” The Advisory Committee Notes further set forth the following non-exclusive factors to be considered in determining whether a case has been fully administered:

- a. whether the order confirming the plan has become final;
- b. whether deposits required by the plan have been distributed;



- c. whether the property proposed by the plan to be transferred has been transferred;
- d. whether the debtor or the successor of the debtor has assumed the business or the management of the property dealt with by the plan;
- e. whether payments under the plan have commenced; and
- f. whether all motions, contested matters, and adversary proceedings have been finally resolved.

Fed R. Bankr. P. 3022 Advisory Committee's note (1991).

17. Courts have adopted the view that “these factors are but a guide in determining whether a case has been fully administered, and not all factors need to be present before the case is closed.” In re Mold Makers, Inc., 124 B.R. 766, 768–69 (Bankr. N.D. Ill. 1990) (holding that the factors listed in the Advisory Committee Notes are “illuminative” but “all of the factors . . . need not be present before the Court will enter a final decree”); see also In re Omega Optical, Inc., 476 B.R. 157, 167 (Bankr. E.D. Pa. 2012) (noting that bankruptcy courts have flexibility in deciding whether an estate is fully administered and may consider the factors set forth in Rule 3022 as well as other relevant factors).

18. Courts have also held that whether a plan of reorganization has been substantially consummated is a key factor to consider in determining whether to enter a final decree. See In re Gates Cmty. Chapel of Rochester, Inc., 212 B.R. 220, 223–24 (Bankr. W.D.N.Y. 1997) (considering substantial consummation as a factor in determining whether to close a case); Walnut Assocs. v. Sidel (In re Walnut Assocs.), 164 B.R. 487, 493 (E.D. Pa. 1994) (same).

19. With respect to the Closing Cases, the factors set forth in the Advisory Committee Notes will have either been satisfied by the hearing on this Motion or are inapplicable, demonstrating that the Closing Cases have been fully administered. Specifically, (i) the Confirmation Order was not appealed and has become final; (ii) the Debtors have emerged from

the chapter 11 cases as reorganized entities; (iii) all transfers of property, payments of claims, and other distributions by the Reorganized Debtors required by the Plan to occur on the Effective Date did so occur; (iv) the Reorganized Debtors have made the distributions provided for under the Plan or will make such distributions in the ordinary course and in accordance with the terms of the Plan; (v) there are no further motions, contested matters, or adversary proceedings for the Reorganized Debtors to resolve;<sup>5</sup> and (vi) the Plan has been substantially consummated.

20. Section 105(a) of the Bankruptcy Code provides that “[t]he court may issue any order, process, or judgement that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code.]” Closing the Closing Cases and administering any unresolved matters with respect to such cases in the Remaining Case is an appropriate use of the Court’s authority under § 105(a) of the Bankruptcy Code.

21. One of the principal purposes behind this motion is to limit the incurrence of quarterly fees payable to the office of the U.S. Trustee by the Reorganized Debtors pursuant to 28 U.S.C. § 1930 (“Section 1930 Fees”). The Reorganized Debtors paid \$146,191 in Section 1930 Fees for the calendar quarter ended September 30, 2019, and the Reorganized Debtors expect that the amount to be paid for the calendar quarter ending December 31, 2019 will be comparable. This is a substantial financial burden on the Reorganized Debtors, and any further amounts paid in Section 1930 Fees will ultimately reduce recoveries by the Reorganized Debtors’ creditors and/or interest holders under the Plan. Moreover, because the Closing Cases are fully administered, the burden of the payment of Section 1930 Fees is without a corresponding benefit to the Debtors’ estates, their creditors, or their interest holders.

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<sup>5</sup> No matters remain pending in this Court pursuant to the Sales Tax Motion or Sales Tax Appeal, and any further matters relating to the Sales Tax Appeal which may arise may be resolved in the Remaining Case.

22. Courts have noted that entry of a final decree is appropriate to end the accrual of Section 1930 Fees. In re Jay Bee Enters., Inc., 207 B.R. 536, 539 (Bankr. E.D. Ky. 1997) (the court noted that it seemed “appropriate to close [the] case to stop the financial drain on the debtor” on account of the Section 1930 Fees); In re Junior Food Mart of Ark., Inc., 201 B.R. 522, 524 (Bankr. E.D. Ark. 1996) (closing case to stop the accrual of Section 1930 Fees).

23. Though the Sales Tax Appeal remains pending in the District Court, further proceedings in this Court will only be required if the District Court issues a remand, and all matters in the Closing Cases have been resolved. Notably, the only Debtor which requested the issuance of sales tax credits by the IDOR pursuant to the Sales Tax Motion is Car Outlet AC LLC (“Car Outlet AC”), and the Reorganized Debtors are requesting that Car Outlet AC’s chapter 11 case—the Remaining Case—remain open at this time. To the extent the Sales Tax Appeal is remanded to the Court for further proceedings, such proceedings may be held in the Remaining Case. Further, while the Reorganized Debtors do not anticipate any further matters arising with respect to the Closing Cases, to the extent any such matters arise, they may be addressed in the Remaining Case or, alternatively, with the reopening of the chapter 11 cases of the relevant Debtor(s).

24. Finally, Local Rule 3022-1 states that “debtors...moving after Chapter 11 plan confirmation either to close the case or enter a final decree must...state within the notice or motion the actual status of payments due to each class under the confirmed plan.” In satisfaction of Local Rule 3022-1, the Reorganized Debtors state as follows:

<u>Class</u>	<u>Claims and Interests</u>	<u>Impairment</u>	<u>Status</u>
Class 1	First Lien Credit Facility Claims	Impaired	Satisfied prior to the date of this Motion in accordance with the Plan

<u>Class</u>	<u>Claims and Interests</u>	<u>Impairment</u>	<u>Status</u>
Class 2	Second Lien Term Loan Claims	Impaired	Satisfied prior to the date of this Motion in accordance with the Plan
Class 3	Third Lien Term Loan Claims	Impaired	Satisfied prior to the date of this Motion in accordance with the Plan
Class 4	Other Priority Claims	Unimpaired	Satisfied prior to the date of this Motion in accordance with the Plan
Class 5	Other Secured Claims	Unimpaired	Satisfied prior to the date of this Motion in accordance with the Plan
Class 6	Convenience Unsecured Claims	Unimpaired	Satisfied prior to the date of this Motion in accordance with the Plan
Class 7	General Unsecured Claims	Impaired	GUC Cash Pool to be distributed and Class A Units in Newco to be issued to Holders of Class 7 Claims prior to the date of the hearing on this Motion; Tax Credit Proceeds to be distributed in accordance with the Plan if the relevant conditions are met
Class 8	Intercompany Claims	Unimpaired / Impaired	Satisfied prior to the date of this Motion in accordance with the Plan
Class 9	Interests in COHI and TFII	Impaired	Satisfied prior to the date of this Motion in accordance with the Plan
Class 10	Interests in Subsidiary Debtors	Unimpaired / Impaired	Satisfied prior to the date of this Motion in accordance with the Plan

25. Accordingly, the Reorganized Debtors submit that there is ample justification for entry of a final decree closing the Closing Cases, and request that the Court enter the Proposed Final Decree.

**NOTICE**

26. Notice of this Motion will be provided to (i) the U.S. Trustee; (ii) BMO as Administrative Agent under the A&R First Lien Credit Facility and counsel thereto;

(iii) Westlake as Lender under the A&R Second Lien Term Loan and counsel thereto; (iii) 11 x 11, LLC as Administrative Agent under the A&R Third Lien Term Loan and counsel thereto; (iv) the United States Attorney's Office for the Northern District of Illinois; (v) the Internal Revenue Service; (vi) the United States Department of Justice; (vii) all of the Debtors' known creditors; and (vii) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

*[Remainder of page intentionally left blank]*

WHEREFORE, the Reorganized Debtors request entry of the Proposed Final Decree, substantially in the form attached to the Motion as **Exhibit A**, (i) closing the Closing Cases and leaving open the Remaining Case; (ii) providing that, subsequent to the entry of the Proposed Final Decree, any pending or future matters regarding the Closing Cases shall be addressed in the Remaining Case; (iii) amending the caption of the Remaining Cases; and (iv) granting such other and further relief as is necessary and proper.

Dated: January 9, 2020  
Chicago, Illinois

SIDLEY AUSTIN LLP

/s/ Bojan Guzina

Bojan Guzina (ARDC #6277585)  
Jackson T. Garvey (ARDC #6320652)  
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ATTORNEYS FOR THE REORGANIZED DEBTORS

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
Eastern Division

In Re:	)	BK No.: 19-03734
	)	(Jointly Administered)
	)	Chapter: 11
TOTAL FINANCE INVESTMENT INC., et	)	Honorable Carol A. Doyle
al.	)	
	)	
Debtor(s)	)	

**FINAL DECREE CLOSING CERTAIN CASES AND  
AMENDING CAPTION OF THE REMAINING CASES**

Upon consideration of the Reorganized Debtors’ Motion for Entry of Final Decree Closing Certain Cases and Amending the Case Caption (the “Motion”), by which the Reorganized Debtors request the entry of a final decree closing the cases set forth on Schedule 1 hereto (the “Closing Cases”) pursuant to sections 105(a) and 350(a) of the Bankruptcy Code, Bankruptcy Rule 3022, and Local Rule 3022-1, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED. All capitalized terms used but not defined in this Final Decree have the meanings ascribed to them in the Motion.
2. The cases of the Reorganized Debtors identified on Schedule 1 to this Final Decree are hereby CLOSED pursuant to section 350(a) of the Bankruptcy Code, effective as of the date of the entry of this Final Decree.
3. Entry of this Final Decree is without prejudice to the rights of the Reorganized Debtors or any other party in interest to seek to reopen any of the Closing Cases for cause pursuant to section 350(b) of the Bankruptcy Code.
4. The Remaining Case (Case No. 19-03740) will remain OPEN pending further order of the Court and shall be administered under the amended caption attached to this Final Decree as Schedule 2.
5. The Reorganized Debtors shall complete all remaining quarterly reports with respect to the Closing Cases and shall pay all fees due and owing under 28 U.S.C. § 1930 with respect to disbursements made in the Closing Cases on the date that such fees are due.
6. The Reorganized Debtors shall not be obligated to pay quarterly fees pursuant to 28 U.S.C. § 1930 (a) with respect to the Closing Cases for any period after the date of the entry of this Final Decree.
7. The requirement to file further post-confirmation reports for the Closing Cases is hereby waived. All further reporting shall occur in the Remaining Case.
8. The Clerk of the Court shall enter this Final Decree on the docket of each of the Closing Cases, and thereafter each such docket shall be marked as “Closed.”
9. The Reorganized Debtors and Kurtzman Carson Consultants LLC, the Debtors’ claims and noticing agent, are authorized to take all actions that may be necessary to undertake the relief granted in

this Final Decree.

10. This Court shall retain jurisdiction to hear and determine any matters or disputes related to the Closing Cases, including, without limitation, matters related to the Sales Tax Motion, Sales Tax Order, and Sales Tax Appeal, and any matters or disputes relating to the effect of discharge and/or injunction provisions contained in the Plan and/or the Confirmation Order.

11. The terms and conditions of this Final Decree shall be immediately effective and enforceable upon its entry.

Enter:

Honorable Carol A. Doyle

United States Bankruptcy Judge

Dated:

**Prepared by:**

Bojan Guzina (ARDC # 6277585)

Jackson T. Garvey (ARDC #6320652)

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ATTORNEYS FOR THE REORGANIZED DEBTORS



**Schedule 1**

**Closing Cases**

<b>Name of Debtor</b>	<b>Case Number</b>
Total Finance Investment Inc.	19-03734
Car Outlet Holding Inc.	19-03737
Full Service Auto Repair AC LLC	19-03744
Todo Seguro AC LLC	19-03746
Todo Seguro Premium Finance AC LLC	19-03748
Total Finance AC LLC	19-03752

**Schedule 2**

**Revised Case Caption**

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

In re:

CAR OUTLET AC LLC<sup>1</sup>

Reorganized Debtor.

Chapter 11

Case No. 19-03740 (CAD)

<sup>1</sup> The last four digits of the Reorganized Debtor's federal tax identification number are 2282. The Reorganized Debtor's mailing address is 3015 W. Irving Park Road, Chicago, IL 60618. The chapter 11 cases of certain affiliates of the Reorganized Debtor have been closed. See Docket No. [\_\_].