IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

ADVANTAGE HOLDCO, INC., et al.,

Debtors.¹

Chapter 11

Case No. 20-11259 (CTG)

(Jointly Administered)

DEBTORS' WITNESS AND EXHIBIT LIST IN CONNECTION WITH THE HEARING ON THE MOTION FOR ENTRY OF AN ORDER CLARIFYING THE COURT'S VEHICLE SURRENDER ORDERS WITH RESPECT TO CONTINUING LIABILITIES

In accordance with the Court's chamber's procedures, the debtors and debtors in possession in the above-captioned cases (the "<u>Debtors</u>") submit the following witness and exhibit list in connection with the September 13, 2021 hearing (the "<u>Hearing</u>") on the *Motion for Entry of an Order Clarifying the Court's Vehicle Surrender Orders With Respect to Continuing Liabilities* [Docket No. 895].

The Debtors may call Alfred C. Farrell, Chief Financial Officer of Advantage Holdco,

Inc., as a rebuttal witness and reserve the right to call additional rebuttal witnesses.

Debtors' Exhibit No.	Docket No.	Title
1	168	Certification of Counsel with Respect to Stipulation Between Debtor Advantage Opco, LLC and Merchants Automotive Group, Inc.
2	169	Order Approving Stipulation between Certain Debtors and Merchants Automotive Group, Inc.

Further, the Debtors may present the following exhibits into evidence:

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Advantage Holdco, Inc. (4832); Advantage Opco, LLC (9101); Advantage Vehicles LLC (6217); E-Z Rent A Car, LLC (2538); Central Florida Paint & Body, LLC (1183); Advantage Vehicle Financing LLC (7263); and RAC Vehicle Financing, LLC (8375). The Debtors' address is PO Box 2818, Windermere, FL, 34786.

Debtors' Exhibit No.	Docket No.	Title
3	152	Motion of Element Fleet Corporation for Relief from the Automatic Stay, Adequate Protection and Related Relief
4	197	Certification of Counsel Regarding (A) Revised Proposed Order Granting Motion of Element Fleet Corporation for Relief from the Automatic Stay, Adequate Protection and Related Relief and (B) No Objection to Same
5	213	Agreed Order Granting Motion of Element Fleet Corporation for Relief from the Automatic Stay, Adequate Protection, and Related Relief
6	192	Certification of Counsel Regarding Stipulation Between the Bancorp Bank and Certain of the Debtors
7	250	Order Granting Relief from the Automatic Stay to The Bancorp Bank
8	215	HFC Acceptance, LLC and Westlake Flooring Company, LLC Motion for Order (I) Compelling Assumption or Rejection of Unexpired Leases Pursuant to 11 U.S.C. Section 365; (II) Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. Section 362; and (III) Granting Related Relief
9	216	Declaration of Paul Kerwin in Support of HFC Acceptance, LLC and Westlake Flooring Company, LLC Motion for Order (I) Compelling Assumption or Rejection of Unexpired Leases Pursuant to 11 U.S.C. Section 365; (II) Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. Section 362; and (III) Granting Related Relief
10	217	Declaration of Jeff Brodsky in Support of HFC Acceptance, LLC and Westlake Flooring Company, LLC Motion for Order (I) Compelling Assumption or Rejection of Unexpired Leases Pursuant to 11 U.S.C. Section 365; (II) Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. Section 362; and (III) Granting Related Relief
11	321	Order Approving Stipulation and Agreement Authorizing the Rejection of Lease Agreements Between HFC Acceptance, LLC and Westlake Flooring Company, LLC and Advantage Rent A Car and E-Z Rent A Car, and Granting Relief from the Automatic Stay and Waiver of Rule 4001(a)(3)

Debtors' Exhibit No.	Docket No.	Title
12	436	Certification of Counsel Regarding Stipulation Between Debtors, Cox Automotive, Inc., and NextGear Capital, Inc.
13	449	Order Approving Stipulation Between Debtors, Cox Automotive, Inc., and NextGear Capital, Inc.

The Debtors request that the Courtroom Clerk permit Andrew J. Roth-Moore to share his

screen to present and reference the above-documents at the Hearing.

Dated: September 9, 2021

COLE SCHOTZ P.C.

/s/ Andrew J. Roth-Moore Norman L. Pernick (No. 2290) Justin R. Alberto (No. 5126) Patrick J. Reilley (No. 4451) Andrew J. Roth-Moore (No. 5988) 500 Delaware Avenue, Suite 1410 Wilmington, Delaware 19801 Telephone: (302) 652-3131 Facsimile: (302) 652-3117 npernick@coleschotz.com jalberto@coleschotz.com aroth-moore@coleschotz.com

Counsel for Debtors and Debtors in Possession