

**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)

Re: Docket No. 895

**CERTIFICATION OF COUNSEL REGARDING MOTION FOR ENTRY OF AN
ORDER CLARIFYING THE COURT’S VEHICLE SURRENDER
ORDERS WITH RESPECT TO CONTINUING LIABILITIES**

The undersigned, counsel to the above-captioned debtors and debtors in possession (collectively, the “Debtors”), hereby certifies as follows:

1. On August 9, 2021 the Debtors filed the *Motion for Entry of an Order Clarifying the Court’s Vehicle Surrender Orders with Respect to Continuing Liabilities* [Docket No. 895] (the “Motion”).

2. Certain parties (collectively, the “Objectors”) filed objections to the Motion: (i) *Objection of The Bancorp Bank to the Motion for Entry of an Order Clarifying the Court’s Vehicle Surrender Orders with Respect to Continuing Liabilities* [Docket No. 907]; (ii) *Objection by HFC Acceptance, LLC and Westlake Flooring Company, LLC to Motion for Entry of an Order Clarifying the Court’s Vehicle Surrender Orders with Respect to Continuing Liabilities* [Docket No. 908]; (iii) *Objection and Reservation of Rights of Element Fleet Corporation to Debtors’ Motion for Entry of an Order Clarifying the Court’s Vehicle Surrender Orders with Respect to Continuing Liabilities* [Docket No. 909]; and (iv) *Objection of Cox Automotive, Inc. to Debtors’ Motion for Entry of an Order Clarifying the Court’s Vehicle*

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.

Surrender Orders with Respect to Continuing Liabilities [Docket No. 911]. Further, counsel for the Office of the U.S Trustee provided informal comments to the proposed order filed with the Motion.

3. On September 13, 2021, the Court held a non-evidentiary hearing on the Motion and denied the relief requested in the Motion.

4. At the direction of the Court, counsel to the Debtors, in conjunction with counsel to the Objectors, prepared the proposed form of order (the “Proposed Order”) attached hereto as **Exhibit A**. Further, a copy of the Proposed Order was circulated to the U.S. Trustee.

5. The Debtors and each Objector consents to the entry of the Proposed Order. Further, the U.S. Trustee does not oppose entry of the Proposed Order.

WHEREFORE, the Debtors respectfully request the Court enter the Proposed Order at the Court’s earliest convenience.

Dated: September 15, 2021

COLE SCHOTZ P.C.

/s/ Andrew J. Roth-Moore

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