

**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)

Related to Docket No. 950

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' MOTION FOR ENTRY
OF AN ORDER (I) ESTABLISHING A SUPPLEMENTAL VEHICLE CLAIMS BAR
DATE, (II) APPROVING THE FORM, MANNER, AND SUFFICIENCY OF NOTICE
THEREOF, AND (III) APPROVING PROCEDURES REGARDING
OBJECTIONS TO THE VEHICLE CLAIMS**

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

1. On September 24, 2021 the Debtors filed the *Debtors' Motion for Entry of an Order (I) Establishing a Supplemental Vehicle Claims Bar Date, (II) Approving the Form, Manner, and Sufficiency of Notice Thereof, and (III) Approving Procedures Regarding Objections to the Vehicle Claims* [Docket No. 950] (the "Motion").

2. Pursuant to the notice of the Motion, the deadline to file an objection to the Motion with the Court was 4:00 p.m. on October 8, 2021 (the "Objection Deadline").

3. The Debtors received informal comments to the Motion from the Office of the United States (the "US Trustee"). To resolve these comments, the Debtors and the US Trustee agreed to changes to the proposed order. Attached hereto as **Exhibit A** is a revised proposed order (the "Revised Proposed Order") and attached as **Exhibit B** is a blacklined Revised Proposed Order reflecting all revisions to the proposed order filed with the Motion. Counsel to

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.

the Debtors' DIP Lender and the Committee reviewed the Revised Proposed Order and do not oppose its entry.

4. The Objection Deadline has passed, and no other objections or responses to the Motion appear on the docket or were served upon undersigned counsel.

WHEREFORE, the Debtors respectfully request the Court enter the Revised Proposed Order at its earliest convenience.

Dated: October 13, 2021

COLE SCHOTZ P.C.

/s/ Andrew J. Roth-Moore
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