

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

ADVANTAGE HOLDCO, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 20-11259 (CTG)
(Jointly Administered)

**Re: Docket No. 324, 371, 462, 463, 478, 482, 524, 525, 576,
578, 601, 603, 623, 625, 633, 634, 648, 649, 673, 674, 709,
713, 751, 753, 783, 787, 824, 825, 854, 857, 878, 879, 945,
946**

**CERTIFICATION OF COUNSEL IN SUPPORT OF ENTRY OF AN ORDER
APPROVING STIPULATION FOR FURTHER EXTENSION OF THE CHALLENGE
PERIOD AND DISCOVERY DEADLINES**

The undersigned counsel to the Official Committee of Unsecured Creditors to the above-captioned Debtors (the “Committee”), hereby certifies and states as follows:

1. On August 14, 2020, the Committee filed the *Stipulation for Extension of the Challenge Period and Discovery Deadlines* (“The Stipulation”) (Doc. No. 433).
2. On September 4, 2020, the Court entered the *Order Approving the Stipulation* (Doc. No. 463).
3. On September 11, 2020, the Committee filed the *Second Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Second Stipulation”) (Doc. No. 478).
4. On September 14, 2020, the Court entered the *Order Approving the Second Stipulation* (Doc. No. 482).
5. On October 1, 2020, the Committee filed the *Third Stipulation for Extension of*

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 Challenge Period and Discovery Deadlines (the “Third Stipulation”) (Doc. No. 524).

6. On October 5, 2020, the Court entered the *Order Approving the Third Stipulation* (Doc. No. 525).

7. On November 2, 2020, the Committee filed the *Fourth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Fourth Stipulation”) (Doc. No. 576).

8. On November 3, 2020, the Court entered the *Order Approving the Fourth Stipulation for Further Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 578).

9. On November 19, 2020, the Committee filed the *Fifth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Fifth Stipulation”) (Doc. No. 601).

10. On November 23, 2020, the Court entered the *Order Approving Fifth Stipulation for Further Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 603).

11. On December 7, 2020, the Committee filed the *Sixth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Sixth Stipulation”) (Doc. No. 623).

12. On December 8, 2020, the Court entered the *Order Approving Sixth Stipulation for Further Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 625).

13. On December 22, 2020, the Committee filed the *Seventh Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Seventh Stipulation”) (Doc. No. 633).

14. On December 23, 2020, the Court entered the *Order Approving Seventh Stipulation for Further Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 634).

15. On January 12, 2021, the Committee filed the *Eighth Stipulation for Extension*

of the Challenge Period and Discovery Deadlines (the “Eighth Stipulation”) (Doc. No. 648).

16. On January 13, 2021, the Court entered the *Order Approving Eighth Stipulation for Further Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 649).

17. On February 1, 2021, the Committee filed the *Ninth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Ninth Stipulation”) (Doc. No. 673).

18. On February 2, 2021, the Court entered the *Order Approving Ninth Stipulation for Further Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 674).

19. On March 4, 2021, the Committee filed the *Tenth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Tenth Stipulation”) (Doc. No. 709).

20. On March 4, 2021, the Court entered the *Order Approving Tenth Stipulation for Further Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 713).

21. On April 2, 2021, the Committee filed the *Eleventh Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Eleventh Stipulation”) (Doc. No. 751).

22. On April 5, 2021, the Court entered the *Order Approving Eleventh Stipulation for Further Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 753).

23. On April 29, 2021, the Committee filed the *Twelfth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Twelfth Stipulation”) (Doc. No. 786).

24. On April 29, 2021, the Court entered the *Order Approving Twelfth Stipulation for Further Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 787).

25. On May 27, 2021, the Committee filed the *Thirteenth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Thirteenth Stipulation”) (Doc. No. 824).

26. On May 28, 2021, the Court entered the *Order Approving Thirteenth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 825).

27. On June 24, 2021, the Committee filed the *Fourteenth Stipulation for Further Extension of the Challenge Period and Discovery Deadlines* (the “Fourteenth Stipulation”) (Doc. No. 854).

28. On June 28, 2021, the Court entered the *Order Approving Fourteenth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 857).

29. On July 22, 2021, the Committee filed the *Fifteenth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Fifteenth Stipulation”) (Doc. No. 878).

30. On July 23, 2021, the Court entered the *Order Approving Fifteenth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 879).

31. On September 16, 2021, the Committee filed the *Sixteenth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Sixteenth Stipulation”) (Doc. No. 945).

32. On September 17, 2021, the Court entered the *Order Approving Sixteenth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (Doc. No. 946).

33. The Committee and 2449276 Ontario Inc. have engaged in further discussions and have entered into the *Seventeenth Stipulation for Extension of the Challenge Period and Discovery Deadlines* (the “Seventeenth Stipulation”).²

34. Accordingly, the Committee respectfully requests that the Court enter the proposed order, attached hereto as Exhibit A, approving the Seventeenth Stipulation.

35. The Seventeenth Stipulation and the proposed order have been reviewed and approved by counsel for the Committee and counsel for 2449276 Ontario Inc.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Seventeenth Stipulation.

Dated: November 10, 2021

MORRIS JAMES LLP

/s/ Brya M. Keilson

Eric J. Monzo (DE Bar No. 5214)
Brya M. Keilson (DE Bar No. 4643)
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: emonzo@morrisjames.com
E-mail: bkeilson@morrisjames.com

-and-

Elizabeth A. Green (admitted pro hac vice)
Andrew V. Layden (admitted pro hac vice)
BAKER & HOSTETLER LLP
200 S. Orange Avenue, Suite 2300
Orlando, Florida 32801
Telephone: (407) 649-4000
Facsimile: (407) 841-0168
E-mail: egreen@bakerlaw.com
E-mail: alayden@bakerlaw.com

*Counsel for the Official Committee of
Unsecured Creditors*