

**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. 1026

**CERTIFICATION OF COUNSEL REGARDING REVISED PROPOSED ORDER
REGARDING THE INCORRECTLY CLASSIFIED CLAIMS OF INTERNATIONAL
FIDELITY INSURANCE COMPANY AND ALLEGHENY CASUALTY COMPANY**

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

1. On November 10, 2021, the Debtors filed *Debtors’ Objection to the Incorrectly Classified Claims of International Fidelity Insurance Company and Allegheny Casualty Company* (the “Objection”) [D.I. 1026].

2. On December 4, 2021, International Fidelity Insurance Company and Allegheny Casualty Company (together “IFIC”) filed the *Response to Debtors Objection to the Incorrectly Classified Claims of Allegheny Casualty Company & International Fidelity Insurance Company* [D.I. 1051].

3. On December 8, 2021, the Debtors filed the *Reply in Support of the Objection to the Incorrectly Classified Claims of International Fidelity Insurance Company and Allegheny Casualty Company* [D.I. 1026].

4. No other responses to the Objection were received or filed.

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.

5. The Parties engaged in discussions to resolve the Objection and have agreed to the terms of a revised proposed order, attached hereto as **Exhibit A**, with respect to the Objection (the “Revised Proposed Order”). A blackline showing changes between the proposed order filed with the Objection and the Revised Proposed Order is attached hereto as **Exhibit B**.

6. The Revised Proposed Order was circulated to the Debtors’ prepetition and DIP lender agent (the “Lender”), the Official Committee of Unsecured Creditors (the “Committee”), and the Office of the United States Trustee. The Lender and Committee do not oppose entry of the Revised Proposed Order. The Office of the United States Trustee takes no position.

WHEREFORE, the Debtors respectfully request the Court enter the Revised Proposed Order attached hereto as **Exhibit A** at the Court’s convenience.

Dated: December 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, DE 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
jalberto@coleschotz.com
npernick@coleschotz.com
preilley@coleschotz.com
aroth-moore@coleschotz.com

*Counsel to the Debtors
and Debtors in Possession*