

**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 Nos. 1068, 1070

**CERTIFICATION OF COUNSEL REGARDING REVISED PROPOSED FINDINGS OF
FACT, CONCLUSIONS OF LAW, AND ORDER APPROVING AND CONFIRMING
THE SECOND AMENDED COMBINED DISCLOSURE STATEMENT AND JOINT
CHAPTER 11 PLAN OF LIQUIDATION OF ADVANTAGE HOLDCO, INC. ET AL.**

The understanding, counsel to the debtors and debtor-in-possession (the “Debtors”) in the above-referenced cases, hereby certifies on follows:

1. On December 9, 2021, the Debtors filed a notice of filing the *Proposed Findings of Fact, Conclusions of Law, and Order Approving and Confirming the Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation of Advantage Holdco, Inc. et al.* (the “Original Proposed Order”) [Docket No. 1070].

2. On December 10, 2021, the Court held a hearing (the “Confirmation Hearing”) to consider final approval of the adequacy of the Disclosure Statement and confirmation of the Plan set forth in the *Second Amended Combined Disclosure Statement* (the “Disclosure Statement”) and *Joint Chapter 11 Plan of Liquidation of Advantage Holdco, Inc. et al.* (the “Plan,” and together with the Disclosure Statement, as amended, modified, or supplemented from time to time the “Combined Plan and Disclosure Statement”) [Docket No. 1068].

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.

3. The Office of the United States Trustee (the “US Trustee”) and HFC Acceptance, LLC and Westlake Flooring Company, LLC (together “HFC”) agreed to revisions to the Original Proposed Order resolving their respective objections to confirmation of the Plan.

4. At the conclusion of the Confirmation Hearing, the Court directed Debtors’ counsel to file a revised proposed order under certification of counsel. A revised proposed *Findings of Fact, Conclusions of Law, and Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of Advantage Holdco, Inc. et al.* (the “Revised Confirmation Order”) is attached hereto as **Exhibit A**. A blackline showing changes to the Original Proposed Order is attached hereto as **Exhibit B**.

5. Counsel to HFC reviewed and accepted the revisions addressing its informal objection. Counsel for the US Trustee, the DIP Lender, and the Official Committee of Unsecured Creditors (the “Committee”) reviewed the Revised Confirmation Order and agreed to its entry.

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

Dated: December 13, 2021

COLE SCHOTZ P.C.

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