

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

F I L E D
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS

OCT 09 2003

KENNETH S. GARDNER, CLERK
PS REP. - KS

In re:) Chapter 11
)
CONSECO, INC. et al.,¹) Case No. 02 B 49672
) Jointly Administered
Debtors.)
) Honorable Carol A. Doyle
)
) Hearing Date: February 4, 2004
) Hearing Time: 11:00 am (if necessary)

**NOTICE OF FILING OF FINAL APPLICATION FOR
ALLOWANCE AND REIMBURSEMENT OF EXPENSES
INCURRED BY MEMBERS OF THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS
OF THE HOLDING COMPANY DEBTORS**

To: Attached Service List

PLEASE TAKE NOTICE that on Thursday, October 9, 2003, we caused to be filed the attached FINAL APPLICATION FOR ALLOWANCE AND REIMBURSEMENT OF EXPENSES INCURRED BY MEMBERS OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF THE HOLDING COMPANY DEBTORS with the U.S. Bankruptcy Court for the Northern District of Illinois, Eastern Division, a copy of which is herewith served upon you.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Order Confirming Reorganizing Debtors' Sixth Amended Joint Plan of Reorganization, the Fee Review Committee will file a report due on January 16, 2004, and, if required, the hearing on any dispute regarding fee applications will be heard on February 4, 2004 at 11:00 a.m.

¹ The Debtors are the following entities: (i) Conseco, Inc., CIHC, Incorporated, CTIHC, Inc., Partners Health Group, Inc., (collectively the "Holding Company Debtors"), (ii) Conseco Finance Corp. and Conseco Finance Servicing Corp. (the "CFC Debtors" and together with the Holding Company Debtors, the "Initial Debtors") and (iii) Conseco Finance Corp. - Alabama, Conseco Finance Credit Corp., Conseco Finance Consumer Discount Company, Conseco Finance Canada Holding Company, Conseco Finance Canada Company, Conseco Finance Loan Company, Rice Park Properties Corporation, Landmark Manufactured Housing, Inc., Conseco Finance Net Interest Margin Finance Corp. I, Conseco Finance Net Interest Margin Finance Corp. II, Green Tree Finance Corp. - Two, Conseco Agency of Nevada, Inc., Conseco Agency of New York, Inc., Green Tree Floorplan Funding Corp., Conseco Agency, Inc., Conseco Agency of Alabama, Inc., Conseco Agency of Kentucky, Inc., and Crum-Reed General Agency, Inc. (collectively, the "CFC Subsidiary Debtors").

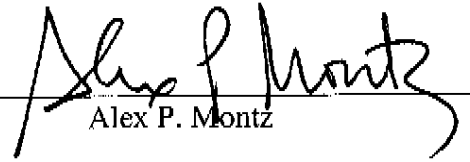
OCT 9 2003 8 53 PM

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MAYER, BROWN, ROWE & MAW LLP

DATE: October 9, 2003

By: _____


Alex P. Montz

Thomas S. Kiriakos, Esq. (ARDC# 6184699)
Craig E. Rcimer, Esq. (ARDC#6210940)
Alex P. Montz, Esq. (ARDC# 6274094)
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

CONSECO, INC. et al.,

Debtors.

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS

OCT 09 2003

KENNETH S. GARDNER, CLERK
PS REP. - KS

) Chapter 11
)
)

) Case No. 02 B 49672

) Jointly Administered

) Honorable Carol A. Doyle

) **Hearing Date: February 4, 2004**

) **Hearing Time: 11:00 am**

) *(if necessary)*

**FINAL APPLICATION
OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE HOLDING COMPANY DEBTORS FOR ALLOWANCE AND
REIMBURSEMENT OF EXPENSES INCURRED BY ITS MEMBERS**

The Official Committee of Unsecured Creditors of the Holding Company Debtors (the "Committee") seeks final reimbursement for expenses incurred by members of the Committee. This Application seeks final allowance and reimbursement of expenses in the aggregate amount of \$35,498.56 by incurred by members of the Committee from January 3, 2003 through September 9, 2003 (the "Application Period").

I. BACKGROUND

1. On December 17, 2002 (the "Petition Date"), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. Pursuant to sections 1107 and 1108 of the Bankruptcy Code, the Debtors are continuing to operate their businesses and manage their properties as debtors-in-possession.

2. Consco and CIHC, Incorporated are the primary Debtors and are the intermediate and ultimate holding companies for subsidiaries engaged in insurance businesses (the "Insurance Subsidiaries") and finance businesses. Consco Finance Corp. is the primary

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finance company, the assets of which are presently subject to a sale process in this Court.² The Insurance Subsidiaries are not only ineligible to be debtors in cases before this Court, but also are believed to be sound and profitable. Moreover, the Insurance Subsidiaries constitute the business cornerstone of the contemplated plan of reorganization for the Debtors.

3. Since August 2002, the Debtors, the unofficial committee of bondholders of the Debtors (the "Unofficial Bondholders Committee"), and a steering committee of bank group members (the "Unofficial Bank Committee") have been in negotiations for a consensual and comprehensive restructuring of the Debtors' indebtedness and outstanding equity. These negotiations culminated in an agreement in principle.

4. On January 3, 2003, the Office of the United States Trustee for the Northern District of Illinois (the "United States Trustee") appointed the Official Committee of Unsecured Creditors of the Holding Company Debtors to represent all unsecured creditors of the Debtors pursuant to Section 1102 of the Bankruptcy Code. The Committee consists of the following entities: Appaloosa, First Pacific Advisors, Metropolitan West Asset Management, LLC, HSBC Bank USA (as indenture trustee), Bank of America, Bank of New York and Angelo Gordon & Co. L.P.

5. On September 9, 2003, the Bankruptcy Court entered an Order (the "Confirmation Order") confirming the Reorganizing Debtors' Sixth Amended Joint Plan of Reorganization pursuant to Chapter 11 of the Bankruptcy Code (the "Plan"). The Plan became effective on September 10, 2003 (the "Effective Date"). Since the Effective Date, the

² Conseco Finance Servicing Corp., one of Conseco Finance Corp.'s subsidiaries, is also a debtor in a Chapter 11 case pending before this Court. See *supra* note 1. However, Conseco Finance Corp. and Conseco Finance Servicing are not debtor entities for which the Official Committee of Unsecured Creditors of the Holding Company Debtors has been appointed.

Committee has completed its duties with the exception of matters related to fee applications and pending appeals.

6. In serving as members of the Committee, the following individuals incurred necessary and reasonable expenses that were set forth in the amounts set forth in the following applications for interim reimbursement of expenses (collectively, the "Interim Expense Applications") filed in these cases:

- (a) First Interim Application of Kenneth Maiman of Appaloosa Management L.P. as a Member of the Official Committee of Unsecured Creditors of the Holding Company Debtors Request for Allowance and Reimbursement of Expenses Incurred on May 13-15, 2003, filed herein on or about August 8, 2003, seeking reimbursement of expenses in the aggregate amount of \$2,431.50, a copy of which is attached hereto as Exhibit A hereto;
- (b) First Interim Application of Robert Rodriguez of First Pacific Advisors as a Member of the Official Committee of Unsecured Creditors of the Holding Company Debtors Request for Allowance and Reimbursement of Expenses Incurred on January 3-9, 2003, filed herein on or about August 8, 2003, seeking reimbursement of expenses in the aggregate amount of \$6,294.91, a copy of which is attached hereto as Exhibit B hereto;
- (c) First Interim Application of Jed A. Hart of Angelo Gordon and Co. as a Member of the Official Committee of Unsecured Creditors of the Holding Company Debtors Request for Allowance and Reimbursement of Expenses Incurred on January 3 and April 28-29, 2003, filed herein on or about August 8, 2003, seeking reimbursement of expenses in the aggregate amount of \$1,678.20, a copy of which is attached hereto as Exhibit C hereto;
- (d) First Interim Application of David Tepper of Appaloosa Management L.P. as a Member of the Official Committee of Unsecured Creditors of the Holding Company Debtors Request for Allowance and Reimbursement of Expenses Incurred on April 28-29 and May 13-15, 2003, filed herein on or about August 8, 2003, seeking reimbursement of expenses in the aggregate amount of \$3,894.92, a copy of which is attached hereto as Exhibit D hereto;
- (e) First Interim Application of Various Members of the Official Committee of Unsecured Creditors of the Holding Company Debtors Request for Allowance and Reimbursement of Expenses Incurred, filed herein on or about October 3, 2003, ordering reimbursement of expenses in the

aggregate amount of \$16,910.69, a copy of which is attached hereto as Exhibit E hereto; and

- (f) First Interim Application of Bridget Garavalia of Bank of America, Individually as a Member of the Official Committee of Unsecured Creditors of the Holding Company Debtors, Request for Allowance and Reimbursement of Expenses Incurred, filed herein on or about October 9, 2003, seeking reimbursement in the aggregate amount of \$4,288.64, a copy of which is attached as Exhibit F hereto.

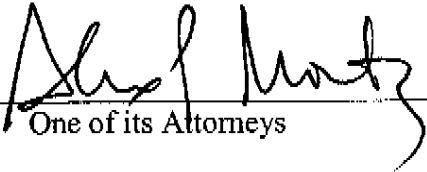
7. The Plan having been confirmed and thus, the major objectives of a successful Chapter 11 case having been attained, such members of the Committee are entitled to, and this Application seeks, the final allowance and reimbursement of the expenses set forth in the Interim Expense Applications.

WHEREFORE, the Committee requests that it be allowed and paid reimbursement for the expenses incurred by its individual members as set forth in the Interim Expense Applications in the aggregate amount of \$35,498.96.

Dated: October 9, 2003

OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE HOLDING COMPANY
DEBTORS

By:


One of its Attorneys

Thomas S. Kiriakos, Esq. (ARDC#6184699)
Craig E. Reimer, Esq. (ARDC#6210940)
Alex P. Montz, Esq. (ARDC#6274094)
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-and-

Bonnie Steingart, Esq.
Vivek Melwani, Esq.
Brian Pfeiffer, Esq.
FRIED, FRANK, HARRIS, SHRIVER & JACOBSON
(A Partnership Including Professional Corporations)
One New York Plaza
New York, New York 10004-1980
Tel: (212) 859-8000 Fax: (212) 859-4000

Co-counsel for the Official Committee of Unsecured
Creditors of the Holding Company Debtors

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:) Chapter 11
)
CONSECO, INC. et al.,¹) Case No. 02 B 49672
) Jointly Administered
Debtors.)
) Honorable Carol A. Doyle
)
) Objection Deadline:
) August 29, 2003

**COVER SHEET FOR FIRST INTERIM APPLICATION
OF KENNETH MAIMAN OF APPALOOSA MANAGEMENT L.P.
AS A MEMBER OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF THE HOLDING COMPANY
DEBTORS REQUEST FOR ALLOWANCE AND
REIMBURSEMENT OF EXPENSES INCURRED ON MAY 13-15, 2003**

NAME OF APPLICANT: Kenneth Maiman of Appaloosa Management L.P.
as a Member of the Official Committee of
Unsecured Creditors of the Holding Company
Debtors

DATE OF ORDER APPOINTING
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF THE
HOLDING COMPANY DEBTORS: January 3, 2003

PERIOD FOR WHICH
COMPENSATION SOUGHT: May 13-15, 2003

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
AUG - 8 2003
KENNETH B. GARDNER, CLERK
PS REP. - KS

¹ The debtors are the following entities: (i) Conesco, Inc., CHIC, Incorporated, CTIHC, Inc., Partners Health Group, Inc., (collectively, the "Holding Company Debtors"), (ii) Conesco Finance Corp., Conesco Finance Servicing Corp. (collectively, the "CFC Debtors"), (iii) Conesco Finance Corp. - Alabama, Conesco Finance Credit Corp., Conesco Finance Consumer Discount Company, Conesco Finance Canada Holding Company, Conesco Finance Canada Company, Conesco Finance Loan Company, Rice Park Properties Corporation, Landmark Manufactured Housing, Inc., Conesco Finance Net Interest Margin Finance Corp. I, Conesco Finance Net Interest Margin Finance Corp. II, Green Tree Finance Corp. - Two, Conesco Agency of Nevada, Inc., Conesco Agency of New York, Inc., Green Tree Floorplan Funding Corp., Conesco Agency, Inc., Conesco Agency of Alabama, Inc., Conesco Agency of Kentucky, Inc., and Crum-Reed General Agency, Inc. (collectively, the "CFC Subsidiary Debtors").

AMOUNT OF EXPENSE
REIMBURSEMENT SOUGHT:

\$2,431.50

THIS IS THE:

First Interim Application of Kenneth Maiman of Appaloosa Management L.P. as a Member of the Official Committee of Unsecured Creditors of the Holding Company Debtors Request for Allowance and Reimbursement of Expenses Incurred on May 13-15, 2003

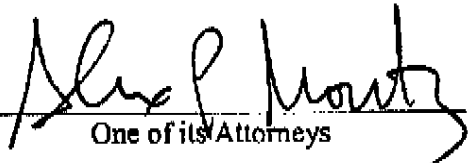
This is the first application filed herein by Kenneth Maiman of Appaloosa Management L.P. as a Member of the Official Committee of Unsecured Creditors of the Holding Company Debtors.

APPLICANT:

KENNETH MAIMAN OF APPALOOSA
MANAGEMENT L.P. AS A MEMBER OF THE
OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE HOLDING COMPANY
DEBTORS

Dated: August 8, 2003

By:


One of its Attorneys

Thomas S. Kiriakos (ARDC #6184699)
Craig E. Reimer (ARDC #6210940)
Alex P. Montz (ARDC #6274094)
MAYER, BROWN, ROWE & MAW LLP
190 South LaSalle Street
Chicago, Illinois 60603
Tel. (312) 782-0600
Fax: (312) 701-7711

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

CONSECO, INC. et al.,

Debtors.

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
AUG - 8 2003
KENNETH S. GARDNER, CLERK
PS REP. - KS

) Chapter 11

) Case No. 02 B 49672

) Jointly Administered

) Honorable Carol A. Doyle

) Objection Deadline:

) August 29, 2003

**FIRST INTERIM APPLICATION OF KENNETH MAIMAN OF
APPALOOSA MANAGEMENT L.P. AS A MEMBER OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF THE HOLDING COMPANY DEBTORS REQUEST
FOR ALLOWANCE AND REIMBURSEMENT
OF EXPENSES INCURRED ON MAY 13-15, 2003**

Kenneth Maiman of Appaloosa as a member of the Official Committee of Unsecured Creditors of the Holding Company Debtors seeks reimbursement for expenses incurred. The Application seeks allowance of reimbursement of \$2,431.50 in total expenses incurred by Kenneth Maiman ("Maiman") of Appaloosa Management L.P. ("Appaloosa") May 13-15, 2003 (the "Application Period").

I. BACKGROUND

1. On December 17, 2002 (the "Petition Date"), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. Pursuant to sections 1107 and 1108 of the Bankruptcy Code, the Debtors are continuing to operate their businesses and manage their properties as debtors-in-possession.

2. Conesco and CIHC, Incorporated are the primary Debtors and are the intermediate and ultimate holding companies for subsidiaries engaged in insurance businesses

(the "Insurance Subsidiaries") and finance businesses. Conseco Finance Corp. is the primary finance company, the assets of which are presently subject to a sale process in this Court.² The Insurance Subsidiaries are not only ineligible to be debtors in cases before this Court, but also are believed to be sound and profitable. Moreover, the Insurance Subsidiaries constitute the business cornerstone of the contemplated plan of reorganization for the Debtors.

3. Since August 2002, the Debtors, the unofficial committee of bondholders of the Debtors (the "Unofficial Bondholders Committee"), and a steering committee of bank group members (the "Unofficial Bank Committee") have been in negotiations for a consensual and comprehensive restructuring of the Debtors' indebtedness and outstanding equity. These negotiations culminated in an agreement in principle.

4. On January 3, 2003, the Office of the United States Trustee for the Northern District of Illinois (the "United States Trustee") appointed the Official Committee of Unsecured Creditors of the Holding Company Debtors to represent all unsecured creditors of the Debtors pursuant to Section 1102 of the Bankruptcy Code. The Committee consists of the following entities: Appaloosa, First Pacific Advisors, Metropolitan West Asset Management, LLC, HSBC Bank USA (as indenture trustee), Bank of America, Bank of New York and Angelo Gordon & Co. L.P.

5. On May 13-15, 2003, Kenneth Maiman of Appaloosa incurred expenses in his capacity as a member of the Official Committee of Unsecured Creditors of the Holding Company Debtors. Maiman incurred expenses in the total amount of \$2,431.50 for roundtrip airfare and hotel accommodations incurred traveling from Newark, New Jersey to Austin, Texas

² Conseco Finance Servicing Corp., one of Conseco Finance Corp.'s subsidiaries, is also a debtor in a Chapter 11 case pending before this Court. See *supra* note 1. However, Conseco Finance Corp. and Conseco Finance Servicing are not debtor entities for which the Official Committee of Unsecured Creditors of the Holding Company Debtors has been appointed.

for meetings with the Texas regulatory authorities. These expenses maybe recompensed by the Debtors, pursuant to the Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Committee Members dated December 18, 2002, and as further amended.

6. The documentation substantiating the requested expenses is attached hereto as Exhibit A, and is incorporated by reference herein.

WHEREFORE, the Committee requests that it be allowed and paid reimbursement for the expenses incurred by Kenneth Maiman of Appaloosa in the amount of \$2,431.50.

Dated: August 8, 2003

OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE HOLDING COMPANY
DEBTORS

By: _____
One of its Attorneys

Thomas S. Kiriakos (ARDC #6184699)
Craig E. Reimer (ARDC #6210940)
Alex P. Montz (ARDC #6274094)
MAYER, BROWN, ROWE & MAW LLP
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Chicago, Illinois 60603
Tel. (312) 782-0600
Fax: (312) 701-7711

EXHIBIT B

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

) Chapter 11

CONSECO, INC. et al.,¹

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS

) Case No. 02 B 49672

Debtors.

) Jointly Administered

AUG - 8 2003

) Honorable Carol A. Doyle

KENNETH S. GARDNER, CLERK
PS REP. - KS

) Objection Deadline:

) August 29, 2003

**COVER SHEET FOR FIRST INTERIM APPLICATION OF
ROBERT RODRIGUEZ OF FIRST PACIFIC ADVISORS AS A MEMBER
OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF THE HOLDING COMPANY DEBTORS REQUEST FOR ALLOWANCE
OF REIMBURSEMENT OF EXPENSES INCURRED ON JANUARY 3-9, 2003**

NAME OF APPLICANT:

Robert Rodriguez of First Pacific Advisors as a
Member of the Official Committee of Unsecured
Creditors of the Holding Company Debtors

DATE OF ORDER APPOINTING
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF THE
HOLDING COMPANY DEBTORS:

January 3, 2003

PERIOD FOR WHICH
COMPENSATION SOUGHT:

January 3-9, 2003

AMOUNT OF EXPENSE
REIMBURSEMENT SOUGHT:

\$6,294.91

¹ The debtors are the following entities: (i) Conseco, Inc., CIHC, Incorporated, CTIHC, Inc., Partners Health Group, Inc., (collectively, the "Holding Company Debtors"), (ii) Conseco Finance Corp., Conseco Finance Servicing Corp. (collectively, the "CFC Debtors"), (iii) Conseco Finance Corp. - Alabama, Conseco Finance Credit Corp., Conseco Finance Consumer Discount Company, Conseco Finance Canada Holding Company, Conseco Finance Canada Company, Conseco Finance Loan Company, Rice Park Properties Corporation, Landmark Manufactured Housing, Inc., Conseco Finance Net Interest Margin Finance Corp. I, Conseco Finance Net Interest Margin Finance Corp. II, Green Tree Finance Corp. - Two, Conseco Agency of Nevada, Inc., Conseco Agency of New York, Inc., Green Tree Floorplan Funding Corp., Conseco Agency, Inc., Conseco Agency of Alabama, Inc., Conseco Agency of Kentucky, Inc., and Crum-Reed General Agency, Inc. (collectively, the "CFC Subsidiary Debtors").

THIS IS THE:

First Interim Application of Robert Rodriguez of First Pacific Advisors as a Member of the Official Committee of Unsecured Creditors of the Holding Company Debtors Request for Allowance and Reimbursement of Expenses Incurred on January 3-9, 2003

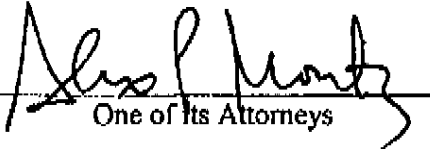
This is the first application filed herein by Robert Rodriguez of First Pacific Advisors as a Member of the Official Committee of Unsecured Creditors of the Holding Company Debtors.

APPLICANT:

ROBERT RODRIGUEZ OF FIRST PACIFIC ADVISORS AS A MEMBER OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF THE HOLDING COMPANY DEBTORS

Dated: August 8, 2003

By:


One of its Attorneys

Thomas S. Kiriakos (ARDC #6184699)
Craig F. Reimer (ARDC #6210940)
Alex P. Montz (ARDC #6274094)
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

CONSECO, INC. et al.,

Debtors.

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS

AUG 28 2003
KENNETH B. GARDNER, CLERK
PS REP. - KS

) Chapter 11

) Case No. 02 B 49672

) Jointly Administered

) Honorable Carol A. Doyle

) Objection Deadline:

) August 29, 2003

**FIRST INTERIM APPLICATION OF
ROBERT RODRIGUEZ OF FIRST PACIFIC ADVISORS AS A MEMBER
OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF THE HOLDING COMPANY DEBTORS REQUEST FOR ALLOWANCE
OF REIMBURSEMENT OF EXPENSES INCURRED ON JANUARY 3-9, 2003**

Robert Rodriguez of First Pacific Advisors as a Member of the Official Committee of Unsecured Creditors of the Holding Company Debtors seeks reimbursement for expenses incurred. The Application seeks allowance of reimbursement of \$6,294.91 in total expenses incurred by Robert Rodriguez of First Pacific Advisors on January 3-9, 2003 (the "Application Period").

I. BACKGROUND

1. On December 17, 2002 (the "Petition Date"), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. Pursuant to sections 1107 and 1108 of the Bankruptcy Code, the Debtors are continuing to operate their businesses and manage their properties as debtors-in-possession.

2. Conseco and CIHC, Incorporated are the primary Debtors and are the intermediate and ultimate holding companies for subsidiaries engaged in insurance businesses

(the "Insurance Subsidiaries") and finance businesses. Conseco Finance Corp. is the primary finance company, the assets of which are presently subject to a sale process in this Court.² The Insurance Subsidiaries are not only ineligible to be debtors in cases before this Court, but also are believed to be sound and profitable. Moreover, the Insurance Subsidiaries constitute the business cornerstone of the contemplated plan of reorganization for the Debtors.

3. Since August 2002, the Debtors, the unofficial committee of bondholders of the Debtors (the "Unofficial Bondholders Committee"), and a steering committee of bank group members (the "Unofficial Bank Committee") have been in negotiations for a consensual and comprehensive restructuring of the Debtors' indebtedness and outstanding equity. These negotiations culminated in an agreement in principle.

4. On January 3, 2003, the Office of the United States Trustee for the Northern District of Illinois (the "United States Trustee") appointed the Official Committee of Unsecured Creditors of the Holding Company Debtors to represent all unsecured creditors of the Debtors pursuant to Section 1102 of the Bankruptcy Code. The Committee consists of the following entities: Appaloosa, First Pacific Advisors, Metropolitan West Asset Management, LLC, HSBC Bank USA (as indenture trustee), Bank of America, Bank of New York and Angelo Gordon & Co. L.P.

5. On January 3-9, 2003, Robert Rodriguez of First Pacific Advisors incurred expenses in his capacity as a member of the Official Committee of Unsecured Creditors of the Holding Company Debtors. Robert Rodriguez incurred expenses in the total amount of \$6,294.91 for roundtrip airfare incurred traveling from Los Angeles, California to Chicago,

² Conseco Finance Servicing Corp., one of Conseco Finance Corp.'s subsidiaries, is also a debtor in a Chapter 11 case pending before this Court. See supra note 1. However, Conseco Finance Corp. and Conseco Finance Servicing are not debtor entities for which the Official Committee of Unsecured Creditors of the Holding Company Debtors has been appointed.

Illinois for attendance at the hearing dated January 3, 2003 and airfare along with related expenses incurred traveling from Los Angeles, California to New York City, New York to attend the a meeting of Conseco Creditors on January 7-9, 2003. These expenses are reimbursable by the Debtors, pursuant to the Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Committee Members dated December 18, 2002, and as further amended.

6. The documentation substantiating the requested expenses is attached hereto as Exhibit A, and is incorporated by reference herein.

WHEREFORE, the Committee requests that it be allowed and paid reimbursement for the expenses incurred by Robert Rodriguez of First Pacific Advisors in the amount of \$6,294.91.

Dated: August 8, 2003

OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE HOLDING COMPANY
DEBTORS

By:


One of its Attorneys

Thomas S. Kiriakos (ARDC #6184699)
Craig E. Reimer (ARDC #6210940)
Alex P. Montz (ARDC #6274094)
MAYER, BROWN, ROWE & MAW LLP
190 South LaSalle Street
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Tel. (312) 782-0600
Fax: (312) 701-7711

Exhibit A

CONSECO, INC., ET AL., DEBTORS.
Case No. 02-B 49672 (Jointly Administered)

**REPORT OF EXPENSES
FOR MEMBER OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF THE HOLDING COMPANY DEBTORS**

Individual Representative: Robert Rodriguez

Member Firm or Institution: First Pacific Advisors

Expense Details

Date:	1-3-03	1-9-03		
Air Transportation	\$2402.00	\$2353.00		
Auto Rental				
Gasoline, etc.				
Car Service for Air Travel				
Taxi, etc.		\$ 101.00		
Lodging	\$ 652.06	\$ 786.85		
Food				
Telephone				
Miscellaneous (please attach description)				
TOTAL CASH DISBURSED	\$3,054.06	\$3,240.85		



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PAGE NO. 1

PNR: 1P-LZ22MB



TO: FIRST PACIFIC ADVISORS INC
11400 W OLYMPIC BLVD
SUITE 1200
LOS ANGELES CA 90064

TRAVELER RODRIGUEZ/ROBERT

Agent	Branch	Customer No.	Account No.	Date
			FIRST	1YMAR03

READ IMPORTANT INFORMATION ON BACK

Co	Day	Date	City-Airport	Time	Carrier	Flight - Class Status	Service - Amount	
V	WE	19MAR	MISC INFORMATION ROUND TRIP COACH AIRFARE FROM LOS ANGELES TO CHICAGO IN JANUARY 2, 2003 AND RETURN ON JANUARY 3 2003 COACH FARE WAS 2402.00					
			LAND	2402.00	TAX		0.00	
					SUBTOTAL		2402.00	
					TOTAL INVOICE AMOUNT		2402.00	
					AMOUNT CHARGED		2402.00	

THIS AMOUNT WILL BE CHARGED TO CREDIT CARD: VI 4271 3825 9541 0566

PAYMENT DUE UPON RECEIPT UNLESS CHARGED ON CREDIT CARD
SOME TICKETS HAVE SEVERE PENALTIES/CANCELLATION CHARGES.
PLEASE CHECK WITH US BEFORE MAKING ANY CHANGES.

INTL TRAVEL-PASSPORT/PROOF OF CITIZENSHIP REQUIRED

IMPORTANT AIRLINES RULES HAVE CHANGED-

ANY CHANGE TO A NON-REFUNDABLE TICKET MUST BE MADE

PRIOR TO DEPARTURE TIME OF OUTBOUND FLIGHT

OR ELSE YOUR TICKET LOST ITS VALUE.

ALSO ANY UNUSED FULL FARE E-TICKET MUST BE

REPORTED TO OUR AGENCY IMMEDIATELY

THANK YOU FOR YOUR BUSINESS

Please read reverse side for terms and conditions.

CLIENT COPY

CODE: A-Air N-Hotel C-Car CLASS: FA First M.M.I.-Coach B-Standard
T-Fuel S-Surveys V-Other Travel Service
STATUS: OK-Confirmed WL-Work List RD-Reserved

00 1802A1P



timely travel international

"Business & Leisure Travel"

400 south beverly drive
suite 107
beverly hills, california 90212

tel (310) 552-3737 fax (310) 286-0664

PASSENGER ITINERARY
PAGE NO. 1



TO:

ROBERT RODRIGUEZ
2206 JOHN ST
MANHATTAN BEACH CA 90266

TRAVELER RODRIGUEZ/ROBERT

Agent	Branch	Customer No.	Account No.	Date
				06JAN03

READ IMPORTANT INFORMATION ON BACK

Day	Date	City-Airport	Time	Carrier	Flight - Class Status	Service - Amount
A TU	07JAN	LV LOS ANGELES AR NEW YORK/KENNEDY	800A 415P	AMERICAN AIR	34J OK	BREAKFAST OSTOP 762
A TH	09JAN	LV NEW YORK/KENNEDY AR LOS ANGELES	700P 1014P	AMERICAN AIR	185Y OK	DINNER OSTOP 762
A TH	09JAN 10JAN	LV NEW YORK/KENNEDY AR LOS ANGELES	955P 1258A	DELTA	1989Y OK	OSTOP 767

FARE IS 3637.00
 THIS BUSINESS FARE IS 3637.00 - *ROUND TRIP*
 COACH ROUND TRIP IS 2353.00 - *AA*
 IF HE GOES AA BUSINESS AND RETURN COACH DELTA IT IS
 2950.00
 I HAVE ENROLLED HIM IN DELTA FREQ FLIER
 HIS NUMBER IS 2399771258

HAVE A PLEASANT TRIP

234408 00025 01/06 1908

CODE: A-Air M-Hotel C-Car GLASS
 T-Tour S-Surface V-Other Travel Service
 (A) First Y.H.I. - Coach S-Standard K-Economy

STATUS OK-Confirmed
 WL -Wait List
 RJ -Request

*Conaco-Creditors Meeting
Committee*



NEW YORK

Guest
Robert Rodriguez
Quikbook #

ROOM 1810
RATE 249.00
NO. PERS 1
FOLIO 1503027 A
PAGE 1
ARRIVE 07-JAN-03 18:14
DEPART 09-JAN-03 07:43
PAYMENT VI

Quikbook
381 Park Avenue South
New York, NY 10016
charge to

DATE	REFERENCE	DESCRIPTION	CHARGE/CREDIT
07-JAN-03	RT1810	Room Charge	249.00
07-JAN-03	RT1810	State Sales Tax	20.54
07-JAN-03	RT1810	City Tax	12.45
07-JAN-03	RT1810	Occupancy Tax	2.00
07-JAN-03	924	In Room Dining <i>LESS \$21 FOR WINE</i>	97.18 - 21 = <u>76.18</u>
07-JAN-03	6603	800-272-4922 19:51 0001	2.00
07-JAN-03	6612	800-272-4922 19:52 0003	2.00
07-JAN-03	597814	WW Fax Revenue	45.00
07-JAN-03	597814	State Sales Tax	3.71
08-JAN-03	RT1810	Room Charge	249.00
08-JAN-03	RT1810	State Sales Tax	20.54
08-JAN-03	RT1810	City Tax	12.45
08-JAN-03	RT1810	Occupancy Tax	2.00
08-JAN-03	1018	HeartBeat Restaurant	29.44
08-JAN-03	597713	WW Fax Revenue	24.00
08-JAN-03	597713	State Sales Tax	1.98
08-JAN-03	597714	WW Fax Revenue	22.00
08-JAN-03	597714	State Sales Tax	1.82
08-JAN-03	9406	818 845 2530 23.43 0001	9.20
08-JAN-03	9407	818 929 7467 22.42 0002	22.79
08-JAN-03	9423	818 929 7467 22.42 0004	16.81
09-JAN-03	1791	Oasis B-Fast	10.74
09-JAN-03	VI	Visa	845.73-

For Authorization Purposes Only

XXXXXXXXXXXX0586 RODRIGUEZ,ROBERT L

Auth Date Code Authorized

07-JAN-03 087096 597.60

07-JAN-03 872813 270.16

Total-Due 0.00

** continued on the next page **

Robert Rodriguez ROOM 1810 DEPART 09-JAN-03 AGENT GMORALES
FOLIO 1503027 07-JAN-03



NEW YORK

guest
Robert Rodriguez
Quikbook #

ROOM 1810
RATE 249.00
NO. PERS 3
FOLIO 1503027 A
PAGE 2
ARRIVE 07-JAN-03 18:14
DEPART 09-JAN-03 07:43
PAYMENT VI

Quikbook
agent

381 Park Avenue South
New York, NY 10016
charge
to

DATE	REFERENCE	DESCRIPTION				CHARGES/CREDITS	
EXPENSE REPORT SUMMARY							
Date	room&tax	Food & Bev	Telephone	Other	Total	Payment	
07-JAN-03	287.70	97.18	4.00	45.00	433.88	0.00	
08-JAN-03	287.79	29.44	37.88	46.00	401.11	0.00	
09-JAN-03	0.00	10.74	0.00	0.00	10.74	845.73-	
Total	575.49	137.36	41.88	91.00	845.73	845.73-	

Thank you for choosing W New York Hotel! We look forward to welcoming you back soon!

As a Starwood Preferred Guest, you could have earned 1301 Starpoints for this visit. Please provide your member number or enroll today.

Robert Rodriguez ROOM DEPART AGENT
FOLIO 1503027 07-JAN-03 1810 09-JAN-03 GMORALES



FOUR SEASONS HOTEL

Chicago

120 East Delaware Plaza
Chicago, IL 60611-1430
(312) 280-8800 (800) 332-3442 For Reservations

Rodriguez, Robert
First Pacific Advisors
2206 John Street
Manhattan Be, CA 90266
USA

Room 4103
Folio A - 958791
Arrive 02-JAN-03 00:00
Depart 03-JAN-03 00:00

Payment Type: VSMC

Date	Reference	Description	Charges	Credits
02-JAN-03	0116	Long Distance Telephone	75.98	
02-JAN-03	RT4103	Room Charge Package	275.00	
02-JAN-03	RT4103	Room Tax	40.98	
02-JAN-03	0080	Long Distance Telephone	114.01	
02-JAN-03	429	Room Service	47.29	
02-JAN-03	0093	Long Distance Telephone	16.47	
02-JAN-03	0096	Long Distance Telephone	23.08	
02-JAN-03	0099	Long Distance Telephone	9.86	
02-JAN-03	0112	Long Distance Telephone	11.51	
02-JAN-03	0113	Long Distance Telephone	14.83	
03-JAN-03	VSMC	Visa / Mastercard		652.06-
03-JAN-03	615	Room Service B	23.05	
		Total-Due	0.00	

Travel Agent:

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, association, or company fails to pay for any part or the full amount of these charges. Please leave your room key at this reception upon departure. Thank You.

Guest Signature

4103

03-JAN-03 00:00

LPAC

Room

Departure Date

Cashier



Date Jan 9 2003

OFFICIAL TAXI RECEIPT

FROM JFK TAXI

TO Hotel to JFK

FARE 4.1 TOLL 3.5 TOTAL 7.6

SIGNATURE [Signature]



Date Jan 9 2003

OFFICIAL TAXI RECEIPT

FROM JFK

TO W. Hotel

FARE PAID \$ 4.1 including

SIGNATURE [Signature] # 11122



800-521-8284

www.taxi4u.com

Driver's Owned & Operated

INDEPENDENT TAXI COMPANY

Date 1/9/03 Time 9:25 PM Cab# 1038

Driver 1 Meter 16.00 Total 16.00

From LAX

To HOME

For Inquiries, Complaints, Or Lost Items Please Call 323-665-0040
Driver May Request Payment Or Deposit In Advance

EXHIBIT C

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

) Chapter 11

CONSECO, INC. et al.,¹

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
AUG - 6 2003

) Case No. 02 B 49672
) Jointly Administered

Debtors.

) Honorable Carol A. Doyle

KENNETH S. GARDNER, CLERK
PS REP. - KS

) Objection Deadline:
) August 29, 2003

**COVER SHEET FOR FIRST INTERIM APPLICATION
OF JED A. HART OF ANGELO GORDON AND CO. AS
A MEMBER OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE HOLDING COMPANY DEBTORS
REQUEST FOR ALLOWANCE OF REIMBURSEMENT
OF EXPENSES INCURRED ON JANUARY 3, 2003 AND APRIL 28-29, 2003**

NAME OF APPLICANT:

Jed A. Hart of Angelo Gordon and Co. as a Member
of the Official Committee of Unsecured Creditors
of the Holding Company Debtors

DATE OF ORDER APPOINTING
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF THE
HOLDING COMPANY DEBTORS:

January 3, 2003

PERIOD FOR WHICH
COMPENSATION SOUGHT:

January 3, 2003 and
April 28-29, 2003

¹ The debtors are the following entities: (i) Conseco, Inc., CHIC, Incorporated, CTHC, Inc., Partners Health Group, Inc., (collectively, the "Holding Company Debtors"), (ii) Conseco Finance Corp., Conseco Finance Servicing Corp. (collectively, the "CFC Debtors"), (iii) Conseco Finance Corp. - Alabama, Conseco Finance Credit Corp., Conseco Finance Consumer Discount Company, Conseco Finance Canada Holding Company, Conseco Finance Canada Company, Conseco Finance Loan Company, Rice Park Properties Corporation, Landmark Manufactured Housing, Inc., Conseco Finance Net Interest Margin Finance Corp. I, Conseco Finance Net Interest Margin Finance Corp. II, Green Tree Finance Corp. - Two, Conseco Agency of Nevada, Inc., Conseco Agency of New York, Inc., Green Tree Floorplan Funding Corp., Conseco Agency, Inc., Conseco Agency of Alabama, Inc., Conseco Agency of Kentucky, Inc., and Crum-Reed General Agency, Inc. (collectively, the "CFC Subsidiary Debtors").

AMOUNT OF EXPENSE
REIMBURSEMENT SOUGHT:

\$1,678.20

THIS IS THE:

First Interim Application of Jed A. Hart of Angelo
Gordon and Co. as a Member of the Official
Committee of Unsecured Creditors of the Holding
Company Debtors Request for Allowance of
Reimbursement of Expenses Incurred on January 3,
2003 and April 28-29, 2003

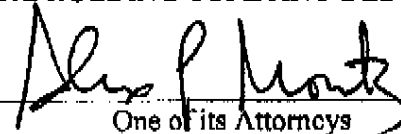
This is the first application filed herein by Jed A. Hart of Angelo Gordon and Co. as a member of
the Official Committee of Unsecured Creditors of the Holding Company Debtors.

APPLICANT:

JED A. HART OF ANGELO GORDON AND CO.
AS A MEMBER OF THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS
OF THE HOLDING COMPANY DEBTORS

Dated: August 8, 2003

By:


One of its Attorneys

Thomas S. Kiriakos (ARDC #6184699)
Craig E. Reimer (ARDC #6210940)
Alex P. Montz (ARDC #6274094)
MAYER, BROWN, ROWE & MAW LLP
190 South LaSalle Street
Chicago, Illinois 60603
Tel. (312) 782-0600
Fax: (312) 701-7711

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

CONSECO, INC. et al.,

Debtors.

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
AUG - 6 2003

KENNETH S. GARDNER, CLERK
PS REP. -KS

Chapter 11

Case No. 02 B 49672

Jointly Administered

Honorable Carol A. Doyle

Objection Deadline:

August 29, 2003

**FIRST INTERIM APPLICATION OF JED A. HART OF
ANGELO GORDON AND CO. AS A MEMBER OF THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS OF THE HOLDING
COMPANY DEBTORS REQUEST FOR ALLOWANCE OF REIMBURSEMENT
OF EXPENSES INCURRED ON JANUARY 3, 2003 AND APRIL 28-29, 2003**

Jed A. Hart of Angelo Gordon and Co. as a member of the Official Committee of Unsecured Creditors of the Holding Company Debtors seeks reimbursement for expenses incurred. The Application seeks allowance of reimbursement of \$1,678.20 in total expenses incurred by Jed A. Hart of Angelo Gordon and Co. on January 3, 2003 and April 28-29, 2003 (the "Application Period").

I. BACKGROUND

1. On December 17, 2002 (the "Petition Date"), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. Pursuant to sections 1107 and 1108 of the Bankruptcy Code, the Debtors are continuing to operate their businesses and manage their properties as debtors-in-possession.

2. Conesco and CIHC, Incorporated are the primary Debtors and are the intermediate and ultimate holding companies for subsidiaries engaged in insurance businesses

(the "Insurance Subsidiaries") and finance businesses. Consoco Finance Corp. is the primary finance company, the assets of which are presently subject to a sale process in this Court.² The Insurance Subsidiaries are not only ineligible to be debtors in cases before this Court, but also are believed to be sound and profitable. Moreover, the Insurance Subsidiaries constitute the business cornerstone of the contemplated plan of reorganization for the Debtors.

3. Since August 2002, the Debtors, the unofficial committee of bondholders of the Debtors (the "Unofficial Bondholders Committee"), and a steering committee of bank group members (the "Unofficial Bank Committee") have been in negotiations for a consensual and comprehensive restructuring of the Debtors' indebtedness and outstanding equity. These negotiations culminated in an agreement in principle.

4. On January 3, 2003, the Office of the United States Trustee for the Northern District of Illinois (the "United States Trustee") appointed the Official Committee of Unsecured Creditors of the Holding Company Debtors to represent all unsecured creditors of the Debtors pursuant to Section 1102 of the Bankruptcy Code. The Committee consists of the following entities: Appaloosa, First Pacific Advisors, Metropolitan West Asset Management, LLC, HSBC Bank USA (as indenture trustee), Bank of America, Bank of New York and Angelo Gordon & Co. L.P.

5. On January 3, 2003 and April 28-29, 2003, Jed A. Hart of Angelo Gordon and Co. incurred expenses in his capacity as a member of the Official Committee of Unsecured Creditors of the Holding Company Debtors. Jed A. Hart incurred expenses in the total amount of \$1,678.20 for roundtrip airfares and hotel accommodations incurred traveling from New York

² Consoco Finance Servicing Corp., one of Consoco Finance Corp.'s subsidiaries, is also a debtor in a Chapter 11 case pending before this Court. See *supra* note 1. However, Consoco Finance Corp. and Consoco Finance Servicing are not debtor entities for which the Official Committee of Unsecured Creditors of the Holding Company Debtors has been appointed.

City, New York to Chicago, Illinois for attendance at the hearing dated January 3, 2003 and traveling from Newark, New Jersey to Atlanta, Georgia for attendance at the Conseco interviews for Glenn Hilliard on April 28-29, 2003. These expenses maybe recompensed by the Debtors, pursuant to the Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Committee Members dated December 18, 2002, and as further amended.

6. The documentation substantiating the requested expenses are attached hereto as Exhibit A, and is incorporated by reference herein.

WHEREFORE, the Committee requests that it be allowed and paid reimbursement for the expenses incurred by Jed A. Hart of Angelo Gordon and Co. in the amount of \$1,678.20.

Dated: August 8, 2003

OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE HOLDING COMPANY
DEBTORS

By: _____


One of its Attorneys

Thomas S. Kiriakos (ARDC #6184699)
Craig E. Reimer (ARDC #6210940)
Alex P. Montz (ARDC #6274094)
MAYER, BROWN, ROWE & MAW LLP
190 South LaSalle Street
Chicago, Illinois 60603
Tel. (312) 782-0600
Fax: (312) 701-7711

Exhibit A

INVOICE/ITINERARY

Corporate Services

AGENT PERSON: PA
CUSTOMER NBR: 0000490250

ITINERARY/INVOICE NO. 4004300
HBMXDZ

DATE: 24 DEC 02
PAGE: 01

TO: JED A HART
ANGELO GORDON AND CO
245 PARK AVE 26TH FLOOR
NEW YORK NY 10167

NR: HART/JED A

3 JAN 03 - FRIDAY	AMERICAN AIRLINES	FLT:309	ECONOMY	EQP: BDEING 757
AIR	LV NEW YORK LGA		800A	02HR 31MIN
	DEPART: CENTRAL TERMINAL		931A	NON-STOP
	AR CHICAGO OHARE			REF: HBMXDZ
	ARRIVE: TERMINAL 3	SEAT-10D	AA-JLL5872	
	HART/JED A	FLT:358	ECONOMY	EQP: MD-88
AIR	AMERICAN AIRLINES	350	400P 6pm	02HR 22MIN
	LV CHICAGO OHARE		220P 9:12	NON-STOP
	DEPART: TERMINAL 3			REF: HBMXDZ
	AR NEW YORK LGA	SEAT-16D	AA-JLL5872	
	ARRIVE: CENTRAL TERMINAL			
	HART/JED A			

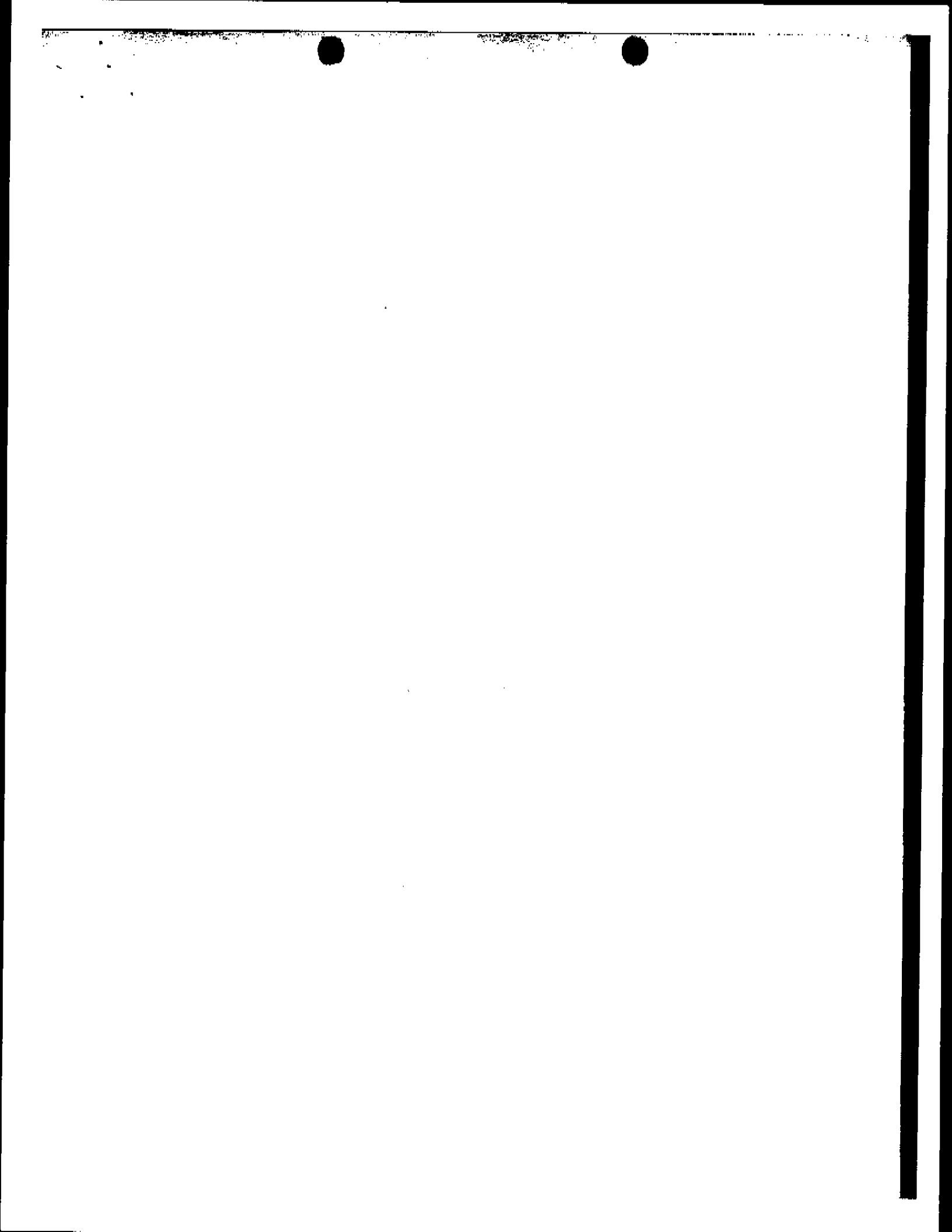
02 JUL 03 - WEDNESDAY
OTHER INFO
THANK YOU FOR CALLING AMERICAN EXPRESS

AIR TICKET	AA731876B140	HART JED A	907.704
ELEC TKT		BILLED TO AX372065457294088	
		SUB TOTAL	907.70
		NET_CC BILLING	907.704
		TOTAL AMOUNT DUE	0.00

TO REACH AMERICAN EXPRESS TRAVEL
PLEASE CALL 800-909-1113.
IF YOU ARE CALLING FROM OUTSIDE THE USA OR
CANADA, PLEASE CALL 781-398-4684 COLLECT.
FOR AFTER HOURS EMERGENCY ASSISTANCE, PLEASE
CALL 800-909-1113. YOUR ACCESS CODE IS 9-5809.
IF YOU ARE CALLING FROM OUTSIDE THE USA OR
CANADA, PLEASE CALL 781-398-4684 COLLECT.
FARE SUBJECT TO CHANGE UNTIL TICKETED
C-NO CAR REQUESTED
3 DAY ADVANCE PURCHASE FARE - RESTRICTIONS APPLY
AS PER OUR AGREEMENT WITH YOUR COMPANY YOU WILL BE
CHARGED A NONREFUNDABLE SERVICE FEE OF 50.00
PER TICKET ISSUED

Please read important consumer disclosure notice
printed on reverse which is part of your contract.

ORIGINAL



AIRMAIL AIRMAIL AIRMAIL AIRMAIL AIRMAIL AIRMAIL AIRMAIL AIRMAIL AIRMAIL



Corporate Services

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Record Locator: BJCWYY
Agent ID: LD
Page: 1

Phone: (800) 908-1113 / Fax: (781) 308-4647

Account Name
JED A HART
ANGELO GORDON AND CO
249 PARK AVE 28TH FLOOR
NEW YORK NY 10167

*Conseco
TRIP*

Travel arrangements prepared exclusively for:

Jed A Hart

Airline Code: 005 Ticket Nbr: 7339878714 Check Digit: 8
Electronic: Yes Invoice #: 4009339 Ticket Date: 4/28/03

Ticket Base Fare: 440.94
Ticket Tax Fare: 51.88
Total Ticket Amount: 492.50

Airfare charged to American Express

Total: 492.50

*Service Fee 50.00
542.50*

April 28, 2003

Monday

CONTINENTAL AIR

Flight: 1181 Class - COACH

Boeing 737

From: NEWARK, NJ
To: ATLANTA, GA

DEPARTING AT 2:00 PM
ARRIVING AT 4:20 PM

No Meal Service

Flight time: 02:20
745 Miles

Departure Terminal: TERMINAL A
Arrival Terminal: NORTH TERMINAL

THIR SEASONS
THIR SEASONS ATLANTA
75 FOURTEENTH STREET
ATLANTA GA 30309

Room reserved for: -Hart
Check in: 4/28/03, Check out: 4/29/03, 1 Night
Rate per night: 280.00 USD
Confirmation #: 7250709

Late Arrival Guarantee - Credit Card
Phone #: 404-851-5898
Fax #: 404-873-4692

Special Info: CP:7250709
CANCEL BEFORE 06 PM DAY ARRIVAL

April 29, 2003

Tuesday

CONTINENTAL AIR

Flight: 1188 Class - COACH

Boeing 737

Seat: 17E

From: ATLANTA, GA
To: NEWARK, NJ

DEPARTING AT 7:30 AM
ARRIVING AT 9:37 AM

SNACK/BRUNCH

Flight time: 02:07
745 Miles

Departure Terminal: NORTH TERMINAL
Arrival Terminal: TERMINAL A

October 26, 2003

Sunday

THANK YOU FOR CALLING AMERICAN EXPRESS

AIRMAIL AIRMAIL AIRMAIL AIRMAIL AIRMAIL AIRMAIL AIRMAIL AIRMAIL

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Agent ID: LB
Page: 2

Phone: (800) 809-1113 / Fax: (781) 398-4647

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IF YOU ARE CALLING FROM OUTSIDE THE USA OR
CANADA, PLEASE CALL 781-398-4644 COLLECT.
FOR AFTER HOURS EMERGENCY ASSISTANCE, PLEASE
CALL 800-809-1113. YOUR ACCESS CODE IS 3-5809.
IF YOU ARE CALLING FROM OUTSIDE THE USA OR
CANADA, PLEASE CALL 781-398-4644 COLLECT.
FARE SUBJECT TO CHANGE UNTIL TICKETED

----- E TICKET INFORMATION -----
AN ELECTRONIC TKT WILL BE ISSUED FOR THIS RESERVATION
GOVERNMENT ISSUED PHOTO I.D. AND CONFIRMATION CODE
REQUIRED AT TIME OF CHECK-IN *2* HOURS PRIOR TO FLIGHT

CONTINENTAL
ALL NONREFUNDABLE TKTS MAY ONLY BE CHANGED IN
ADVANCE OF EITHER DEPARTURE OR RETURN DATE AND ALL
RULES WILL APPLY TO CHANGE. ALL NONREFUNDABLE TKTS
HAVE NO ON-GOING VALUE IF THERE IS NO-SHOW FOR ANY
REASON. THIS APPLIES TO DOMESTIC TRAVEL ONLY.

AS PER OUR AGREEMENT WITH YOUR COMPANY YOU WILL BE
CHARGED A NONREFUNDABLE SERVICE FEE OF 50.00
PER TICKET ISSUED

The following Frequent Flyer Numbers have been validated:

Carrier	Traveler	Account
CONTINENTAL AIR	Jed A Hart	HM377407

Airline Record Locators:

Airline Reference	Carrier
UBDL00	CONTINENTAL AIR

For Itinerary changes, please contact your travel office via telephone.



FOUR SEASONS HOTEL
Atlanta

Arrival : 04/28/03
Departure: 04/29/03
Room : 1210

Mr. Ted A Hart
Angelo Gordon Co
115 Park Ave
10th Fl
New York, NY 10167-0094

STATEMENT
Four Seasons Hotel Atlanta, 04/28/03 06:01/27 HOLLYC/ 1 / W=1 CHI

Description	Debit	Credit
Room Charge	200.00	
State Room Tax	14.00	
City Room Tax	14.00	
Total	228.00	
Balance	228.00 \$	

Signature: _____

Cancel

EXHIBIT D

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

) Chapter 11

CONSECO, INC. et al.,¹

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS

) Case No. 02 B 49672
) Jointly Administered

Debtors.

)
) **AUG - 8 2003**

) Honorable Carol A. Doyle

)
) **KENNETH B. GARDNER, CLERK**
) **PS REP. - KS**

) Objection Deadline:
) August 29, 2003

**COVER SHEET FOR FIRST INTERIM APPLICATION
OF DAVID TEPPER OF APPALOOSA MANAGEMENT L.P. AS A
MEMBER OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE HOLDING COMPANY DEBTORS
REQUEST FOR ALLOWANCE AND REIMBURSEMENT OF
EXPENSES INCURRED ON APRIL 28-29, 2003 AND MAY 13-15, 2003**

NAME OF APPLICANT:

David Tepper of Appaloosa Management L.P. as a
Member of the Official Committee of Unsecured
Creditors of the Holding Company Debtors

DATE OF ORDER APPOINTING
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF THE
HOLDING COMPANY DEBTORS:

January 3, 2003

PERIOD FOR WHICH
COMPENSATION SOUGHT:

April 28-30, 2003 and
May 13-15, 2003

¹ The debtors are the following entities: (i) Conseco, Inc., CIHC, Incorporated, CTIHC, Inc., Partners Health Group, Inc., (collectively, the "Holding Company Debtors"), (ii) Conseco Finance Corp., Conseco Finance Servicing Corp. (collectively, the "CFC Debtors"), (iii) Conseco Finance Corp. - Alabama, Conseco Finance Credit Corp., Conseco Finance Consumer Discount Company, Conseco Finance Canada Holding Company, Conseco Finance Canada Company, Conseco Finance Loan Company, Rice Park Properties Corporation, Landmark Manufactured Housing, Inc., Conseco Finance Net Interest Margin Finance Corp. I, Conseco Finance Net Interest Margin Finance Corp. II, Green Tree Finance Corp. - Two, Conseco Agency of Nevada, Inc., Conseco Agency of New York, Inc., Green Tree Floorplan Funding Corp., Conseco Agency, Inc., Conseco Agency of Alabama, Inc., Conseco Agency of Kentucky, Inc., and Crum-Reed General Agency, Inc. (collectively, the "CFC Subsidiary Debtors").

AMOUNT OF EXPENSE
REIMBURSEMENT SOUGHT:

\$3,894.92

THIS IS THE:

First Interim Application of David Tepper of Appaloosa Management L.P. as a Member of the Official Committee of Unsecured Creditors of the Holding Company Debtors Request for Allowance and Reimbursement of Expenses Incurred on April 28-30, 2003 and May 13-15, 2003

This is the first application filed herein by David Tepper of Appaloosa Management L.P. as a Member of the Official Committee of Unsecured Creditors of the Holding Company Debtors.

APPLICANT:

DAVID TEPPER OF APPALOOSA
MANAGEMENT L.P. AS A MEMBER OF THE
OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE HOLDING COMPANY
DEBTORS

Dated: August 8, 2003

By:


One of its Attorneys

Thomas S. Kiriakos (ARDC #6184699)
Craig E. Reimer (ARDC #6210940)
Alex P. Montz (ARDC #6274094)
MAYER, BROWN, ROWE & MAW LLP
190 South LaSalle Street
Chicago, Illinois 60603
Tel. (312) 782-0600
Fax: (312) 701-7711

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

CONSECO, INC. et al.,

Debtors.

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS

AUG - 8 2003

KENNETH S. GARDNER, CLERK
PS REP. - KS

Chapter 11

Case No. 02 B 49672

Jointly Administered

Honorable Carol A. Doyle

Objection Deadline:

August 29, 2003

**FIRST INTERIM APPLICATION OF DAVID TEPPER OF
APPALOOSA MANAGEMENT L.P. AS A MEMBER OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS
OF THE HOLDING COMPANY DEBTORS REQUEST FOR
ALLOWANCE AND REIMBURSEMENT OF EXPENSES
INCURRED ON APRIL 28-29, 2003 AND MAY 13-15, 2003**

David Tepper of Appaloosa as a member of the Official Committee of Unsecured Creditors of the Holding Company Debtors seeks reimbursement for expenses incurred. The Application seeks allowance of reimbursement of \$3,894.92 in total expenses incurred by David Tepper ("Tepper") of Appaloosa Management L.P. ("Appaloosa") April 28-30, 2003 and May 13-15, 2003 (the "Application Period").

1. BACKGROUND

1. On December 17, 2002 (the "Petition Date"), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. Pursuant to sections 1107 and 1108 of the Bankruptcy Code, the Debtors are continuing to operate their businesses and manage their properties as debtors-in-possession.

2. Conseco and CIIIC, Incorporated are the primary Debtors and are the intermediate and ultimate holding companies for subsidiaries engaged in insurance businesses

(the "Insurance Subsidiaries") and finance businesses. Conseco Finance Corp. is the primary finance company, the assets of which are presently subject to a sale process in this Court.² The Insurance Subsidiaries are not only ineligible to be debtors in cases before this Court, but also are believed to be sound and profitable. Moreover, the Insurance Subsidiaries constitute the business cornerstone of the contemplated plan of reorganization for the Debtors.

3. Since August 2002, the Debtors, the unofficial committee of bondholders of the Debtors (the "Unofficial Bondholders Committee"), and a steering committee of bank group members (the "Unofficial Bank Committee") have been in negotiations for a consensual and comprehensive restructuring of the Debtors' indebtedness and outstanding equity. These negotiations culminated in an agreement in principle.

4. On January 3, 2003, the Office of the United States Trustee for the Northern District of Illinois (the "United States Trustee") appointed the Official Committee of Unsecured Creditors of the Holding Company Debtors to represent all unsecured creditors of the Debtors pursuant to Section 1102 of the Bankruptcy Code. The Committee consists of the following entities: Appaloosa, First Pacific Advisors, Metropolitan West Asset Management, LLC, HSBC Bank USA (as indenture trustee), Bank of America, Bank of New York and Anglo Gordon & Co. L.P.

5. On April 28-30, 2003 and May 13-15, 2003, David Tepper of Appaloosa incurred expenses in his capacity as a member of the Official Committee of Unsecured Creditors of the Holding Company Debtors. Tepper incurred expenses in the total amount of \$3,894.92 for roundtrip airfares and hotel accommodations incurred traveling from Newark, New Jersey to

² Conseco Finance Servicing Corp., one of Conseco Finance Corp.'s subsidiaries, is also a debtor in a Chapter 11 case pending before this Court. See *supra* note 1. However, Conseco Finance Corp. and Conseco Finance Servicing are not debtor entities for which the Official Committee of Unsecured Creditors of the Holding Company Debtors has been appointed.

Atlanta, Georgia for attendance at the Conseco interviews for Glenn Hilliard on April 28-29, 2003 and traveling from Newark, New Jersey to Austin, Texas for meetings with the Texas regulatory authorities on May 13-15, 2003. These expenses may be recompensed by the Debtors, pursuant to the Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Committee Members dated December 18, 2002, and as further amended.

6. The documentation substantiating the requested expenses is attached hereto as Exhibit A, and is incorporated by reference herein.

WHEREFORE, the Committee requests that it be allowed and paid reimbursement for the expenses incurred by David Tepper of Appaloosa in the amount of \$3,894.92.

Dated: August 8, 2003

OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE HOLDING COMPANY
DEBTORS

By: 

One of its Attorneys

Thomas S. Kiriakos (ARDC #6184699)
Craig E. Reimer (ARDC #6210940)
Alex P. Montz (ARDC #6274094)
MAYER, BROWN, ROWE & MAW LLP
190 South LaSalle Street
Chicago, Illinois 60603
Tel. (312) 782-0600
Fax: (312) 701-7711

Exhibit A



Appaloosa
MANAGEMENT

26 Main Street, 1st Floor, Chatham, New Jersey 07928

(973) 701-7000

Fax: (973) 701-7309

David Tepper / Expense Report

Date	Description	Airfare	Hotel	Meals	Total
4/28/03	Delta-EWR to ATL (00673385156986)	649.50			649.50
4/29/03	Continental-ATL to EWR (00573385156993)	460.00			460.00
4/28/03	American Express Ticketing Fee	35.00			35.00
4/29/03	Four Seasons Hotel Atlanta		251.80		251.80
4/30/03	Airflight Insurance (00673385156986)	19.50			19.50
4/30/03	Airflight Insurance (00573385156993)	19.50			19.50
	TOTAL	1183.50	251.80		1435.30

Card Transactions for DAVID TEPPER

	Foreign Spending	Amount \$
MAY 5, 2003 PAYMENT RECEIVED - THANK YOU		1,086.88
April 23, 2003 NERO'S LIVINGSTON NJ FOOD AND BEVERAGE TIP 00001000 Reference: 000032507		66.65
April 28, 2003 AMERICAN EXPRESS TVL SUMMIT NJ CONTINENTAL AIRLINES From: ATLANTA GA To: NEWARK NJ Carrier: CO Class: AB Ticket Number: 00573385156993 Date of Departure: 04/29 Passenger Name: TEPPER/D Document Type: PASSENGER TICKET		460.00

- Entertainment
(tip on 1st party
gross)

- Receivable from
Conoco

Prepared For
DAVID TEPPER
APPALOOSA MANAGEMENT

Account Number XXXXXXXXXX Page 2 of 8

Transactions Continued	Foreign Spending	Amount \$	
April 28, 2003 AMERICAN EXPRESS TVL SUMMIT NJ DELTA AIR LINES From: NEWARK NJ To: ATLANTA GA Carrier: DL Class: YD Ticket Number: 00673385156986 Date of Departure: 04/28 Passenger Name: TEPPER/D Document Type: PASSENGER TICKET		849.50	- Rec from Conyco
April 28, 2003 AMERICAN EXPRESS TRASAN FRANSISCO CA TRAVEL/TOURS/FEES Reference: 298159 Fee Number: 0000007820		35.00	- Rec from Conyco
April 29, 2003 FOUR SEASONS HOTELS ATLANTA GA Arrival Date: 04/28/03 Departure Date: 04/29/03 No of Nights: 1 LODGING Reference: 012175124		251.80	- Rec from Conyco
April 30, 2003* AIRFLIGHT INSURANCE PREMIUM TKT NO. 00673385156986		19.50	- Rec from Conyco
April 30, 2003* AIRFLIGHT INSURANCE PREMIUM TKT NO. 00673385156993		19.50	- Rec from Conyco
Activity for DAVID TEPPER	New Charges Payments/Credits	1,501.95 -4,096.93	Visit to Atlanta 2003

AMERICAN EXPRESS

Travel

AMERICAN EXPRESS
TRAVEL RELATED SERVICES COMPANY, INC.
361 Springfield Avenue
Summit, NJ 07901
Phone: 908 273-5500
Fax: 908 273-5582

INVOICE/ITINERARY

SALES PERSON: KH ITINERARY/INVOICE NO. 0001276
CUSTOMER NBR: 0667000888 FODIXM

DATE: 28 APR 03
PAGE: 01

TO: APPALOOSA MANAGEMENT LP
26 MAIN STREET FIRST FLR
CHATHAM NJ 07928

OR: TEPPER/DAVID

9 APR 03 - TUESDAY

AIR CONTINENTAL AIRLINES FLT:1168 FIRST CLASS BREAKFAST
LV ATLANTA 730A EGP: BOEING 737 500
DEPART: NORTH TERMINAL 02HR 07MIN
AR NEWARK 937A NON-STOP
ARRIVE: TERMINAL A REF: U6SWVB
TEPPER/DAVID SEAT- 2E CD-FN407160

IR TICKET C07330515699
LEC TKT

TEPPER DAVID
BILLED TO ~~XXXXXXXXXXXXXXXXXXXX~~ 460.00*
SUR TOTAL 460.00
NET CC BILLING 460.00*
TOTAL AMOUNT DUE 0.00

ST 1022318-10 TA 149-REGISTERED OHIO TRAVEL AGENCY

L1192 WASHINGTON UBI 600-469-694

***** FEE INFO *****
AIRLINE TICKET DISTRIBUTION FEE 35.00

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I have read and accept the above itinerary. I also have been advised of change and cancellation fees.