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**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
	:	
Bruce DeMustchine,	:	
	:	
Plaintiff,	:	Adv. Proc. 12-02065 (MG)
	:	
v.	:	
	:	
RAHI Real Estate Holdings, LLC.	:	
	:	
Defendant.	:	
-----X	:	
In re	:	
	:	Case No. 12-12020 (MG)
RESIDENTIAL CAPITAL, LLC, <i>et al.</i> ,	:	
	:	Chapter 11
	:	
Debtors	:	Jointly Administered
-----X	:	



**JOINT PROGRESS REPORT PURSUANT TO ORDER APPROVING
MANDATORY SUPPLEMENTAL AP PROCEDURES FOR AP ACTIONS**

Defendant GMAC Mortgage, LLC (“**GMACM**”), a debtor and debtor in possession in the above-captioned chapter 11 cases (collectively with all affiliated debtors and debtors in possession, the “**Debtors**”), and Bruce DeMustchine (“**Plaintiff**” and, together with the Debtors, the “**Parties**”) hereby submit this joint status report in connection with the above-captioned adversary proceeding (the “**Adversary Proceeding**”).

PROGRESS REPORT

1. This joint progress report is being submitted by the Parties pursuant to the pursuant to *Order Approving Mandatory Supplemental AP Procedures for AP Actions* entered by the Bankruptcy Court in the above-captioned chapter 11 cases on March 22, 2013 [Docket No. 3293] (the “**AP Procedures Order**”).¹

2. As directed by the Court at the initial pre-trial conference held on February 28, 2013 (the “**Initial Pre-Trial Conference**”), on March 8, 2013, the Parties met and conferred telephonically regarding a potential mutual resolution of the Adversary Proceeding.

3. On March 26, 2013, the Debtors filed and served a notice of applicability of the AP Procedures Order in the Adversary Proceeding. [Docket No. 9]

4. On April 1, 2013, the Parties and Special Borrowers’ Counsel conducted a telephonic Initial Conference pursuant to the AP Procedures Order. The Parties in good faith discussed a potential resolution of the Adversary Proceeding at the Initial Conference. No resolution has been reached.

¹ Capitalized terms used and not defined herein have the meanings ascribed to them in the AP Procedures Order.

5. The Parties agree that they desire to proceed with the Adversary Proceeding, including conducting an pre-trial status conference, which is currently scheduled to take place on April 11, 2013 at 10:00 a.m. (Eastern) (the “**April 11th Omnibus Hearing**”).

6. As further directed at the Initial Pre-Trial Conference, the Parties intend to appear at the April 11th Omnibus Hearing to present their respective discovery demands and to submit proposed case management and scheduling orders in connection therewith.

7. The Parties and Special Borrowers Counsel further agree that any and all other conditions precedent to moving forward with the Adversary Proceeding set forth in the Adversary Procedures have been satisfied or are being waived upon mutual consent.

Dated: April 4, 2013
New York, New York

/s/ Norman S. Rosenbaum
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