

MORRISON & FOERSTER LLP
 1290 Avenue of the Americas
 New York, New York 10104
 Telephone: (212) 468-8000
 Facsimile: (212) 468-7900
 Norman S. Rosenbaum
 Paul A. Galante
 Erica J. Richards

LEGG LAW FIRM LLC
 5500 Buckeystown Pike
 Frederick, MD 21703
 Telephone: (301) 620-1016
 Facsimile: (301) 620-1018
 Phillip R. Robinson

Counsel for Kevin J. Matthews

*Counsel for the Debtors and
 Debtors in Possession*

SILVERMAN ACAMPORA LLP
 100 Jericho Quadrangle, Suite 300
 Jericho, New York 11753
 Telephone: (516) 479-6326
 Ronald J. Friedman
 Justin S. Krell

*Special Borrowers' Counsel to the Official
 Committee of Unsecured Creditors*

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

-----X	:	
Kevin J. Matthews,	:	
	:	
Plaintiff,	:	Adv. Proc. 12-01933 (MG)
	:	
v.	:	
	:	
GMAC Mortgage, 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 Kevin J. Matthews (“**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. On March 26, 2013, the Debtors filed and served a notice of applicability of the AP Procedures Order in the Adversary Proceeding. [Docket No. 14]

3. 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 at this time but the parties are continuing discussions informally amongst themselves.

4. The Parties agree that they desire to proceed with the Adversary Proceeding, including conducting an initial pre-trial status conference, which is currently

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

scheduled to take place on April 11, 2013 at 10:00 a.m. (Eastern) (the “**April 11th Omnibus Hearing**”).

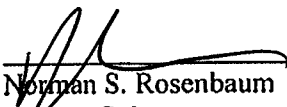
5. The Parties further agree that they wish at this time to move forward with the following two dispositive motions currently scheduled to be heard during the April 11th Omnibus Hearing:

- Plaintiff’s Motion for Partial Summary Judgment as to Liability Only Against Defendant GMAC Mortgage Co., LLC [Docket No. 5]
- Debtors’ Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rules 7009 and 7012(b) and FRCP 9, 12(b)(5), and 12(b)(6) [Docket No. 6]

6. 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.

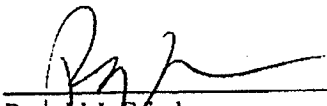
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Dated: April 4, 2013
New York, New York



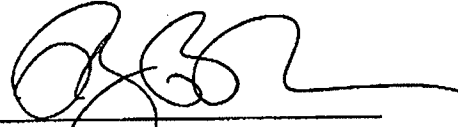
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SILVERMAN ACAMPORA LLP
100 Jericho Quadrangle, Suite 300
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Phillip R. Robinson
LEGG LAW FIRM LLC
5500 Buckeystown Pike
Frederick, MD 21703
Telephone: (301) 620-1016
Facsimile: (301) 620-1018

Counsel for Kevin J. Matthews