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April 17, 2013

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Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, NY 10004

Re: GMAC Mortgage, LLC's Request for Extension of Deadline to Respond in
Adversary Proceeding *Solano v. GMAC Mortgage, LLC, et al.*,
Adversary No. 13-01255 (MG)

Dear Judge Glenn:

We are counsel to Residential Capital, LLC, GMAC Mortgage, LLC ("**GMAC Mortgage**") and their debtor affiliates (collectively, the "**Debtors**") in their jointly administered chapter 11 bankruptcy cases, Case No. 12-12020 (MG), and in the above-captioned adversary proceeding (the "**Adversary Proceeding**") initiated by Julio Solano (the "**Plaintiff**") seeking a determination of the non-dischargeability of any debt owed to Plaintiff by the Debtors. By Stipulation dated March 20, 2013 and entered by the Court on April 3, 2013, the Court extended the Debtors' deadline to answer or otherwise respond in the Adversary Proceeding until April 18, 2013. The Debtors had requested this extension to determine whether a global resolution of Mr. Solano's pending motion for relief from the automatic stay [Docket No. 2604], his motion to permit a late proof of claim [Docket No. 2935], and this adversary proceeding would be possible. Since that time, the Debtors have been unable to reach Mr. Solano's counsel despite several attempts to do so.

Mr. Solano's stay relief motion and his late proof of claim motion are currently scheduled to be heard on April 30, 2013, and the Debtors anticipate that if they are unable to contact Mr. Solano's counsel, these motions will go forward. The Debtors believe that the parties would benefit from the resolution of those motions and, more importantly, an Initial Conference, as defined in the *Order Approving Debtors' Motion Pursuant to 11 U.S.C §§ 105(a) and (d), Bankruptcy Rules 1015(c), 2002(m), 7016, and 9007 and Local Bankruptcy Rule 2002-2 for Entry of an Order Approving (A) Supplement to Case Management Order Establishing Mandatory Procedures for Management of Adversary Proceedings Commenced by Borrowers and Former Borrowers and (B) Related Relief* [Docket No. 3293] (the



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“Borrower AP Procedures”), particularly in light of the nature of the relief requested in the Adversary Proceeding, prior to expending estate or Plaintiff’s resources in responding to the complaint or litigating the Adversary Proceeding.

For the foregoing reasons, the Debtors respectfully request that the Court extend the Defendants’ deadline to answer or otherwise respond to the Complaint until May 24, 2013. The Debtors propose to maintain the pre-trial conference, as currently scheduled, on the agenda for their May 14, 2013 omnibus hearing. The Debtors will attempt to comply with the Borrower AP Procedures in time to have the May 14, 2013 pre-trial conference also serve as the Pre-Trial Status Conference under the Borrower AP Procedures. A proposed form of order granting such extension is enclosed.

Respectfully submitted,

/s/ Norman S. Rosenbaum

Norman S. Rosenbaum

Enclosure

cc: Ronald J. Friedman
Justin S. Krell
Richard Sax

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

-----)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
-----)	
Julio Solano)	
	Plaintiff,)	
)	
v.)	Adv. No. 13-01255 (MG)
)	
GMAC Mortgage LLC and Residential)	
Capital, LLC,)	
)	
Defendants.)	
)	
)	
)	
)	
-----)	

**ORDER EXTENDING DEFENDANTS' DEADLINE TO ANSWER
OR OTHERWISE RESPOND TO ADVERSARY COMPLAINT**

Upon the request (the “**Request**”) of GMAC Mortgage, LLC (“**GMAC Mortgage**”) and the above-captioned debtors and debtors in possession to extend the deadline for each of the above-captioned defendants (the “**Defendants**”) to answer or otherwise respond to the complaint filed in above-captioned adversary proceeding; and it appearing that this Court has jurisdiction to consider the Request pursuant to 28 U.S.C. §§ 157 and 1334; and after due deliberation thereon; it is hereby:

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Request is GRANTED as provided in this Order.

2. The deadline for each Defendant to file an answer or otherwise respond to the complaint in this adversary proceeding is hereby extended through and including May 24, 2013.

3. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

Dated: April __, 2013
New York, New York

THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE