

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

In re:

RESIDENTIAL CAPITAL, LLC et al.,

Debtors.

Case No. 12-12020 (MG)

Chapter 11

(Joint Administration)

AMERICAN RESIDENTIAL EQUITIES,
LLC, in its own individual capacity and in its
capacity as Trustee under that certain
American Residential Equities, LLC Master
Trust Agreement dated August 8, 2005,

Plaintiff,

v.

GMAC MORTGAGE, LLC, as successor
by merger to GMAC Mortgage Company,
BALBOA INSURANCE COMPANY, and
ALLY FINANCIAL, INC.,

Defendants.

Adv. Pro. No. 12-01934 (MG)

**STIPULATION EXTENDING THE TIME FOR PLAINTIFF
AMERICAN RESIDENTIAL EQUITIES, LLC TO RESPOND TO
DEFENDANT ALLY FINANCIAL INC'S MOTION TO DISMISS**

WHEREAS, on May 10, 2013, defendant Ally Financial Inc. ("AFI") , in accordance with the deadline set by a prior stipulation so-ordered by the Court, filed a Motion to Dismiss the First Amended Complaint (the "AFI Motion");

WHEREAS, on May 14, 2013 it was publicly announced that AFI had reached a global settlement of numerous issues related to the Debtors' bankruptcy cases and a Plan Support Agreement embodying the terms of that global settlement is contemplated; and



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WHEREAS, in order to give the parties time to consider the potential impact of the Plan Support Agreement and proposed plan on the claims asserted in the action, Plaintiff and AFI have agreed to adjourn the briefing scheduling on the AFI Motion;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and AFI, that the date by which Plaintiff shall file its opposition to the AFI Motion is preliminarily extended through and including June 27, 2013 without prejudice to a subsequent application for a further extension or other relief.

Dated: New York, New York
May 23, 2013

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IT IS SO ORDERED.

Dated: New York, New York
June 7, 2013

/s/Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge