

**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.)	(Joint Administration)
<hr/>		
AMERICAN RESIDENTIAL EQUITIES,)	
LLC, in its own individual capacity and in its)	
capacity as Trustee under that certain)	Adv. Pro. No. 12-01934 (MG)
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.)	

**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 an Order by the Court authorizing the Debtors to enter into a Plan Support Agreement embodying the terms of that global settlement was subsequently entered by the Court on June 26, 2013; and



WHEREAS, in order to give the parties additional 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 September 1, 2013 without prejudice to a subsequent application for a further extension or other relief.

Dated: New York, New York
June 27, 2013

STORCH AMINI & MUNVES PC
By: /s/ John W. Brewer
John W. Brewer
Two Grand Central Tower
140 East 45th Street, 25th Floor
New York, New York 10017
Telephone: (212) 490-4100
Attorneys for Plaintiff

OTTERBOURG, STEINDLER,
HOUSTON & ROSEN, P.C.
By: /s/ Richard G. Haddad
Richard G. Haddad (rhaddad@oshr.com)
A Member of the Firm
230 Park Avenue
New York, New York 10169
Tel: (212) 661-9100
Counsel for Defendant Ally Financial Inc.

IT IS SO ORDERED.

Dated: New York, New York
June 27, 2013

/s/Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge