

**Hearing Date and Time: December 4, 2018 at 2:00 p.m. (Prevailing Eastern Time)**  
**Deadline for Objections: November 16, 2018 at 4:00 p.m. (Prevailing Eastern Time)**

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*Counsel for the ResCap Liquidating Trust*

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

-----  
In re: )  
 ) Case No. 12-12020 (MG)  
 )  
RESIDENTIAL CAPITAL, LLC, et al., )  
 ) Chapter 11  
 )  
Debtors. ) Jointly Administered  
 )  
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**NOTICE OF MOTION FOR (I) AN ORDER EXTENDING THE TERM OF  
THE RESCAP LIQUIDATING TRUST AND (II) A FINAL DECREE  
CLOSING CERTAIN JOINTLY ADMINISTERED CHAPTER 11 CASES**

PLEASE TAKE NOTICE that on November 5, 2018, the ResCap Liquidating Trust filed the *Motion for (i) an Order Extending the Term of the ResCap Liquidating Trust and (ii) a Final Decree Closing Certain Jointly Administered Chapter 11 Cases* (the “**Motion**”). A hearing on the Motion will be held before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court located at One Bowling Green, New York, New York 10004, Courtroom 523 on **December 4, 2018 at 2:00 p.m. prevailing Eastern time**, or as soon thereafter as counsel can be heard.

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motion, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy



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Court, together with a copy to the Chambers of Judge Glenn, and served so as to be received no later than **4:00 p.m. prevailing Eastern time on November 16, 2018** (the “**Objection Deadline**”), upon (i) co-counsel to the ResCap Liquidating Trust, Morrison & Foerster LLP, 250 West 55th Street, New York, NY 10019 (Attention: Gary S. Lee and Norman S. Rosenbaum); (ii) co-counsel to the ResCap Liquidating Trust, Kramer Levin Naftalis & Frankel, LLP, 1177 Avenue of the Americas, New York, NY 10036 (Attention: Kenneth H. Eckstein, Douglas H. Mannal, and Joseph A. Shifer); (iii) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, NY 10014 (Attention: Linda A. Riffkin); and (iv) The ResCap Liquidating Trust, 8400 Normandale Lake Blvd. Suite 175, Minneapolis, MN 55437 (Attention: Lauren Graham Delehey).

PLEASE TAKE FURTHER NOTICE that if no objections or other responses are timely filed and served with respect to the Motion, the ResCap Liquidating Trust may, on or after the Objection Deadline, submit to the Bankruptcy Court an order and final decree substantially in the forms annexed as Exhibit A and Exhibit B to the Motion, which the Bankruptcy Court may enter without further notice or opportunity to be heard.

Dated: November 5, 2018  
New York, New York

KRAMER LEVIN NAFTALIS & FRANKEL LLP

/s/ Joseph A. Shifer  
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CLOSING CERTAIN JOINTLY ADMINISTERED CHAPTER 11 CASES**

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