

POLSINELLI
Daniel J. Flanigan
600 Third Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 644-2090
Facsimile: (212) 684-0197
Counsel for ResCap Borrower Claims 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

**CERTIFICATE OF NO OBJECTION TO FOURTH MOTION FOR ORDER
EXTENDING THE TERM OF THE RESCAP BORROWER CLAIMS TRUST**

The ResCap Borrower Claims Trust (“**Borrower Trust**”)¹, as successor to the debtors and debtors-in-possession in the above-captioned cases, hereby submits this *Certificate of No Objection to Fourth Motion for Order Extending the Term of the ResCap Borrower Claims Trust* (the “**Certificate**”), pursuant to Local Bankruptcy Rule 9075-2, and respectfully states:

1. On November 3, 2022, the *Fourth Motion for Order Extending the Term of the ResCap Borrower Claims Trust* was filed as Document Number 10731 (the “**Motion**”).
2. Pursuant to the Order dated May 23, 2012, establishing notice, case management and administrative procedures (Docket No. 141), notice of the Motion was provided by First-Class United States Mail or electronic mail on November 4, 2022, to the parties and claimants listed on

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.



Exhibits A and B to the *Certificate of Service* filed on November 14, 2022, as Document Number 10736.

3. Further, pursuant to the Order dated May 23, 2012, establishing notice, case management and administrative procedures (Docket No. 141), an amended notice of the Motion was provided by First-Class United States Mail or electronic mail on November 10, 2022, to the parties and claimants listed on Exhibits A and B to the *Certificate of Service* filed on November 14, 2022, as Document Number 10737.

4. The deadline for filing and objection or response to the Motion expired on November 17, 2022 (the “**Objection Deadline**”).

5. The Objection Deadline has now passed and counsel has reviewed the case docket not less than forty-eight (48) hours after expiration of the Objection Deadline, and is not aware of any objection, responsive pleading, or request for hearing with respect to the Motion that have been filed with the clerk or served on counsel for the Borrowers Trust.

6. The Borrowers Trust respectfully requests that the Court enter an order granting the Motion without further pleading or a hearing.

Dated: New York, New York
November 21, 2022

/s/ Daniel J. Flanigan
Daniel J. Flanigan
POLSINELLI
600 Third Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 644-2090
Facsimile: (212) 684-0197
dflanigan@polsinelli.com

Counsel for ResCap Borrower Claims Trust