

LIQUIDATING TRUST

Information for State Income Tax Purposes

The ResCap Liquidating Trust (the "Trust") has recently completed filing income tax returns for the calendar year 2016 in those states in which the Trust has determined that it had a filing obligation, based on the Trust's property, payroll or other connections with the states. The Trust's state filing obligation is reduced for the calendar year 2016 due to a reduction in the Trust's property, payroll and other connections with the states.

The 2016 ResCap Liquidating Trust Beneficiary Tax Worksheets for State Specific Income Tax Purposes for Beneficiaries of Trust Units for the calendar year 2016 reflect the income and deductions that the Trust determined should be allocated to each state in which it filed an income tax return.

Unitholders ("Beneficiaries") must make their own determination as to which state income tax returns, if any, they are required to file as a result of their ownership of Trust Units or otherwise, and their share of Trust income and deductions, if any, that must be reported on any such state income tax return.

THIS LETTER IS NOT INTENDED TO AND DOES NOT PROVIDE TAX ADVICE RELATING TO THE HOLDING OF TRUST UNITS. EACH BENEFICIARY SHOULD SEEK TAX ADVICE BASED ON ITS PARTICULAR CIRCUMSTANCES FROM ITS OWN TAX ADVISOR. THIS LETTER MAY NOT BE USED OR QUOTED IN WHOLE OR IN PART IN CONNECTION WITH ANY OFFERING OR SALE OF SECURITIES.