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May 12, 2015

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By Overnight Delivery

Hon. Martin Glenn, USBJ
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 1004-1408

Re: In re Residential Capital, LLC et al.
United States Bankruptcy Court
Southern District of New York
Jointly Administered Under Case No. 12-12020 (MG)

Dear Judge Glenn:

This firm is counsel to the ResCap Liquidating Trust (the "Trust"). Pursuant to your *Memorandum Opinion and Order Sustaining In Part and Overruling In Part the ResCap Liquidating Trust's Objection to Proofs of Claim Filed by Duncan K. Robertson* [Docket No. 8533] entered on April 28, 2015, we spoke with Mr. Robertson and counsel with whom he is consulting in connection with the disputed claims on May 8, 2015 regarding the potential settlement of those claims not expunged by the Court's order, as well as scheduling issues related to such claims. The parties agreed to continue settlement discussions until the earlier of (i) 45 days or (ii) the date the parties agree that settlement discussions are at an impasse.

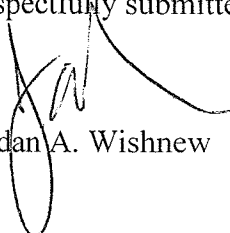
Given that the parties are attempting to come to a consensual resolution, the Trust suggests that an evidentiary hearing should not be scheduled at this time. If the parties are not able to consensually resolve this matter on or before June 26, 2015, then the parties will attempt to agree on a schedule for any necessary discovery and will confer with the Court on an acceptable date for an evidentiary hearing. We will promptly alert the Court in the event we cannot reach a consensus.



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Respectfully submitted,



Jordan A. Wishnew

Cc: Duncan K. Robertson (via email)