

Hearing Date and Time: June 23, 2015 at 10:00 a.m. (Prevailing Eastern Time)
Response Date and Time: May 28, 2015 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, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
-----)	

**NOTICE OF FILING OF SUPPLEMENTAL HORST DECLARATION IN
SUPPORT OF THE RESCAP LIQUIDATING TRUST'S EIGHTY-SIXTH
OMNIBUS OBJECTION TO CLAIMS ((A) NO LIABILITY CLAIMS
AND (B) MODIFY AND ALLOW CLAIMS) AND AMENDED
EXHIBIT A TO THE PROPOSED ORDER**

PLEASE TAKE NOTICE that on May 7, 2015, the undersigned filed *The ResCap Liquidating Trust's Eighty-Sixth Omnibus Objection to Claims ((A) No Liability Claims and (B) Modify and Allow Claims)* [Docket No. 8581] (the "Objection").

PLEASE TAKE FURTHER NOTICE that the ResCap Liquidating Trust hereby submits a supplemental declaration by Deanna Horst (the "Supplemental Declaration"), attached hereto as Exhibit 1, annexing an amended copy of Exhibit A to the Objection's proposed form of order, which appears as Exhibit A to the Supplemental



Declaration. The amended copy of Exhibit A modifies the “Reason for Disallowance” for Claim No. 1671 filed by claimant Shore Line Realty & Associates Inc., a No Liability Claim subject to the Objection.

Dated: May 13, 2015
New York, New York

/s/ Norman S. Rosenbaum
Norman S. Rosenbaum
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Counsel for The ResCap Liquidating Trust

Exhibit 1

Supplemental Horst Declaration

**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.)	Jointly Administered
_____)	

**SUPPLEMENTAL DECLARATION OF DEANNA HORST IN SUPPORT OF
THE RESCAP LIQUIDATING TRUST’S EIGHTY-SIXTH OMNIBUS
OBJECTION TO CLAIMS ((A) NO LIABILITY CLAIMS AND
(B) MODIFY AND ALLOW CLAIMS)**

I, Deanna Horst, hereby certify that:

1. I am the Chief Claims Officer for The ResCap Liquidating Trust (the “Liquidating Trust”).

2. On May 7, 2015, The ResCap Liquidating Trust (the “Liquidating Trust”) filed *The ResCap Liquidating Trust’s Eighty-Sixth Omnibus Objection to Claims ((A) No Liability Claims and (B) Modify and Allow Claims)* [Docket No. 8581] (the “Objection”)¹ which included my declaration in support of the Objection (*see Exhibit 1* annexed to the Objection) (the “Horst Declaration”). This Supplemental Declaration is filed in support of the Objection.

3. The Liquidating Trust seeks to modify the “Reason for Disallowance” for Claim No. 1671 filed by claimant Shore Line Realty & Associates Inc., a No Liability Claim listed on Exhibit A to the Proposed Order. Based on the Liquidating Trust’s review, and for the reasons described in greater detail in the Objection, the Horst Declaration, and the amended Exhibit A, the Debtors are not liable to this claimant for the amount asserted in Claim No. 1671. The

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

Liquidating Trust hereby submits an amended copy of Exhibit A to the Proposed Order, attached hereto.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 13, 2015

/s/ Deanna Horst
Deanna Horst
Chief Claims Officer for The ResCap Liquidating Trust

EXHIBIT A

Amended Copy of Exhibit A to the Proposed Order

In re RESIDENTIAL CAPITAL, LLC, et al. (CASE NO. 12-12020 (MG)) (JOINTLY ADMINISTERED)
EXHIBIT A
EIGHTY-SIXTH OMNIBUS OBJECTION - NO LIABILITY (NON-BORROWER CLAIMS)

Claims to be Disallowed and Expunged						
	Name of Claimant	Claim Number	Date Filed	Claim Amount	Asserted Debtor Name	Asserted Case Number Reason for Disallowance
1	BEVERLY GROUP INC 660 4TH STREET STE 116 SAN FRANCISCO, CA 94107	2206	11/05/2012	Administrative Priority Administrative Secured Secured Priority \$7,500.00 General Unsecured	Residential Capital, LLC	12-12020 Basis of claim is for unpaid real estate commission for a short sale. The closing fell through and commission was not earned as the transaction did not close. Review of Books and Records confirms that Debtors did not have a commitment to pay unless transaction closed.
2	City of Stockton Administrative Services 425 N El Dorado St Stockton, CA 95202	6228	11/30/2012	Administrative Priority Administrative Secured \$6,414.88 Secured Priority General Unsecured	Residential Capital, LLC	12-12020 Books and records research found no record of the invoices, which were submitted with this claim, owing to claimant by any Debtor. The Debtors' books and records do not reflect any sums (pre- or post-petition) owing to this claimant by any Debtor. Moreover, while the claim included information relating to a certain parcel of real property, the Trust's examination of the Debtors' books and records reflect that the Debtors had a pre-existing relationship with the identified parcel but only as the servicer of the 2nd mortgage. Debtor received notice of the code violation and the invoices on multiple occasions and responded back to the city that Debtor was the servicer of the 2nd mortgage, and Option One/Am Home Mtg was servicing the 1st mortgage. Debtor provided Claimant with Option One's contact information and notified the city that they needed to contact Option One to clear the code/lien. Therefore, there is no basis for liability against the Debtors.
3	Eldorado Neighborhood Second Homeowners Association c/o Terra West Management Services 6655 S. Cimarron Road, Suite 200 Las Vegas , NV 89113	1289	10/15/2012	\$0.00 Administrative Priority \$0.00 Administrative Secured \$0.00 Secured \$0.00 Priority \$887.71 General Unsecured	GMAC Mortgage, LLC	12-12032 Per claimant, the claim was paid and amounts are no longer due.
4	FARRIS ENTERPRISES LLC 94 1506 LANIKUHANA AVE 577 MILIANI, HI 96789	508	09/17/2012	Administrative Priority Administrative Secured Secured Priority \$525.00 General Unsecured	Residential Capital, LLC	12-12020 Per claimant, the claim was paid and amounts are no longer due.
5	Gilmer County Tax Commissioner 1 Broad Street Suite 105 Ellijay, GA 30540	447	08/31/2012	Administrative Priority Administrative Secured \$952.96 Secured Priority General Unsecured	Residential Capital, LLC	12-12020 Per claimant, the claim was paid and amounts are no longer due.
6	HARBOR BREEZE CONDOMINIUM 5471 VINELAND RD 7301 ORLANDO, FL 32811	723	09/24/2012	Administrative Priority Administrative Secured \$6,063.68 Secured Priority General Unsecured	Residential Capital, LLC	12-12020 The Debtors' books and records do not reflect any sums (pre- or post-petition) owing to this claimant by any Debtor. Moreover, while the claim included information relating to a certain parcel of real property, the Trust's examination of the Debtors' books and records did not reflect that the Debtors had any pre-existing relationship with the identified parcel, either in their capacity as a loan servicer or investor. Therefore, there is no basis for liability against the Debtors.

In re RESIDENTIAL CAPITAL, LLC, et al. (CASE NO. 12-12020 (MG)) (JOINTLY ADMINISTERED)
EXHIBIT A
EIGHTY-SIXTH OMNIBUS OBJECTION - NO LIABILITY (NON-BORROWER CLAIMS)

Claims to be Disallowed and Expunged						
	Name of Claimant	Claim Number	Date Filed	Claim Amount	Asserted Debtor Name	Asserted Case Number Reason for Disallowance
7	LAW OFFICES OF MARSHALL C WATSON C/O - Scott Weiss, Esq. 1800 NW 49th St Ste 120 Fort Lauderdale, FL 33309	3643	11/08/2012	Administrative Priority Administrative Secured Secured Priority \$5,959.00 General Unsecured	Residential Capital, LLC	12-12020 The Liquidating Trust requested that claimant provide additional detail to support the claim. Claimant has not provided any response. The Trust's examination of the Debtors' books and records confirmed that there were no outstanding pre- or post-petition invoice amounts owed to claimant by any Debtor.
8	Law Offices of Marshall C. Watson P.A. c/o Scott Weiss, Esq. 1800 NW 49th St Ste 120 Ft Lauderdale, FL 33309	3745	11/08/2012	\$22,174.70 Administrative Priority Administrative Secured Secured Priority General Unsecured	Residential Capital, LLC	12-12020 The Liquidating Trust requested that claimant provide additional detail to support the claim. Claimant has not provided any response. The Trust's examination of the Debtors' books and records confirmed that there were no outstanding pre- or post-petition invoice amounts owed to claimant by any Debtor.
9	LUNDBERG AND ASSOCIATES 3269 S MAIN ST STE 100 SALT LAKE CITY, UT 84115	2557	11/06/2012	Administrative Priority Administrative Secured Secured Priority \$6,085.00 General Unsecured	Residential Capital, LLC	12-12020 Books and records research found no record of the invoices, which were submitted with this claim, owing to claimant by any Debtor. The Debtors' books and records do not reflect any sums (pre- or post-petition) owing to this claimant by any Debtor.
10	MARSHALL L COHEN PA PO BOX 60292 FORT MYERS, FL 33906	4667	11/13/2012	Administrative Priority Administrative Secured Secured Priority \$5,000.00 General Unsecured	ditech, LLC	12-12021 The Liquidating Trust reached out to claimant a number of times, through both email and phone calls, to obtain copies of invoices, loan numbers, or any additional identifying information to research the merits of the claim. None were provided. Moreover, the Debtors' books and records do not reflect any sums (pre- or post-petition) owing to this claimant by any Debtor.
11	MARTIN COUNTY TAX COLLECTOR 3485 SE WILLOUGHBY BLVD STUART, FL 34994	123	06/04/2012	Administrative Priority Administrative Secured Secured Priority General Unsecured \$2,427.83	Residential Capital, LLC	12-12020 Per claimant, the claim was paid and amounts are no longer due.
12	MERIDEN TAX COLLECTOR 142 E MAIN ST RM 117 MERIDEN, CT 06450	1884	10/29/2012	Administrative Priority Administrative Secured Secured Priority General Unsecured \$1,104.47	GMAC Mortgage, LLC	12-12032 Per claimant, the claim was paid and amounts are no longer due.
13	Mississippi Department of Revenue Bankruptcy Section P.O. Box 22808 Jackson, MS 39225	340	07/31/2012	Administrative Priority Administrative Secured Secured Priority General Unsecured \$996.75	GMAC Mortgage, LLC	12-12032 Per claimant, the claim was paid and amounts are no longer due.
14	Norfolk City Treasurer Norfolk City PO Box 3215 Norfolk, VA 23514	632	09/21/2012	\$0.00 Administrative Priority \$0.00 Administrative Secured \$0.00 Secured \$125.00 Priority \$0.00 General Unsecured	GMAC Mortgage, LLC	12-12032 Per claimant, the claim was paid and amounts are no longer due.

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Claims to be Disallowed and Expunged

	Name of Claimant	Claim Number	Date Filed	Claim Amount	Asserted Debtor Name	Asserted Case Number	Reason for Disallowance
15	PAUL DAVIS RESTORATION AND REMODELING 77833 PALAPAS RD PALM DESERT, CA 92211	625	09/21/2012	Administrative Priority Administrative Secured Secured Priority \$10,159.81 General Unsecured	Residential Capital, LLC	12-12020	Books and records research found no record of the invoices, which were submitted with this claim, owing to claimant by any Debtor. Moreover, the Debtors' books and records do not reflect any sums (pre- or post-petition) owing to this claimant by any Debtor.
16	Revenue Commissioner Morgan County Amanda G. Scott PO Box 696 Decatur, AL 35602	7296	10/28/2013	Administrative Priority Administrative Secured \$694.90 Secured Priority General Unsecured	Residential Capital, LLC	12-12020	Per claimant, the claim was paid and amounts are no longer due.
17	Samuel I. White, P.C. Donna J. Hall, Esq. 5040 Corporate Woods Drive, Suite 120 Virginia Beach, VA 23452	5666	11/16/2012	Administrative Priority Administrative Secured Secured Priority \$6,126.78 General Unsecured	Residential Capital, LLC	12-12020	Books and records research found no record of the invoices, which were submitted with this claim, owing to claimant by any Debtor. Moreover, the Debtors' books and records do not reflect any sums (pre- or post-petition) owing to this claimant by any Debtor.
18	SERVPRO OF THE REND LAKE REGION PO BOX 624 MOUNT VERNON, IL 62864-0014	4220	11/09/2012	Administrative Priority Administrative Secured \$7,427.49 Secured Priority General Unsecured	GMAC Mortgage, LLC	12-12032	Claimant is a contractor seeking payment in connection with property repairs done for a GMACM borrower. Claimant believes that it is entitled to the insurance proceeds related to the borrower's property. Claimant's recourse is with the borrower/homeowner, not with GMACM. GMACM had no agreement with the contractor.
19	Shore Line Realty & Associates Inc. 1407 Viscaya Parkway, # 2 Cape Coral, FL 33990	1671	10/25/2012	\$0.00 Administrative Priority \$0.00 Administrative Secured \$7,800.00 Secured \$0.00 Priority \$0.00 General Unsecured	Residential Capital, LLC	12-12020	Basis of claim is for unpaid real estate commission for a short sale. The closing fell through and commission was not earned as the transaction did not close. Review of Books and Records confirms that Debtors did not have a commitment to pay unless transaction closed. Moreover, the Debtors' books and records do not reflect any sums (pre- or post-petition) owing to this claimant by any Debtor.
20	SUN PRAIRIE CITY 300 E MAIN ST SUN PRAIRIE CITY TREASURER SUN PRAIRIE, WI 53590	2155	11/05/2012	Administrative Priority Administrative Secured Secured Priority \$356.75 General Unsecured	GMAC Mortgage, LLC	12-12032	Per claimant, the claim was paid and amounts are no longer due.
21	Trenton Water Works Trenton Water Works / City of Trenton / Accounts & Control 319 East State St., Room 113 Trenton, NJ 08608	479	09/14/2012	Administrative Priority Administrative Secured \$515.22 Secured Priority General Unsecured	Homecomings Financial, LLC	12-12042	Per claimant, the claim was paid and amounts are no longer due.

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	Name of Claimant	Claim Number	Date Filed	Claim Amount	Asserted Debtor Name	Asserted Case Number	Reason for Disallowance
22	WILLOWTREE HOMEOWNERS ASSOC 1111 STEVENS ST NO 17 MEDFORD, OR 97504	2480	11/06/2012	Administrative Priority Administrative Secured \$4,818.30 Secured Priority General Unsecured	Residential Capital, LLC	12-12020	Books and records research found no record of the invoices, which were submitted with this claim, owing to claimant by any Debtor. The Debtors' books and records do not reflect any sums (pre- or post-petition) owing to this claimant by any Debtor. Moreover, while the claim included information relating to a certain parcel of real property, the Trust's examination of the Debtors' books and records did not reflect that the Debtors had any pre-existing relationship with the identified parcel, either in their capacity as a loan servicer or investor. Therefore, there is no basis for liability against the Debtors.
23	Wise CAD Elizabeth Weller Linebarger Goggan Blair & Sampson, LLP 2323 Bryan Street, Ste 1600 Dallas, TX 75201	4879	11/16/2012	Administrative Priority Administrative Secured \$1,489.77 Secured Priority General Unsecured	GMAC Mortgage, LLC	12-12032	Per claimant, the claim was paid and amounts are no longer due.