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

IN RE RESCAP LIQUIDATING TRUST  
MORTGAGE PURCHASE LITIGATION

Case No. 12-12020 (MG) (Ch. 11)  
Adv. Proc. No. 14-07900 (MG)

*This document relates to:*

Residential Funding Co. v. HSBC Mortg. Corp. (USA),  
Adv. Proc. No. 14-01915 (MG)  
Residential Funding Co. v. UBS Real Estate Secs., Inc.,  
Adv. Proc. No. 14-01926 (MG)  
ResCap Liquidating Trust v. Summit Fin. Mortg. LLC,  
Adv. Proc. No.14-01996 (MG)  
ResCap Liquidating Trust v. Mortg. Investors Grp., Inc.,  
Adv. Proc. No.14-02004 (MG)  
ResCap Liquidating Trust v. Sun Trust Mortg. Inc., Adv.  
Proc. No.13-1820 (MG)

**JOINDER OF STEERING  
COMMITTEE GROUP OF RMBS  
HOLDERS IN OPPOSITION TO  
DISCLOSURE OF  
CONFIDENTIAL MEDIATION  
COMMUNICATIONS**



TO THE HONORABLE MARTIN GLENN:

The Steering Committee Group of RMBS Holders (the “Steering Committee”)<sup>1</sup> is the largest group of RMBS investors who appeared in the ResCap bankruptcy proceeding. In April and May 2013, the Steering Committee investors participated in the Court-ordered mediation, before the Honorable James Peck, that led to the Global Settlement embodied in the confirmed, consensual chapter 11 plan. Certain defendants in the above captioned adversary proceedings have asked the Court to modify its mediation order, which ensured the confidentiality of the mediation negotiations, to now permit disclosure of these negotiations. *Notice of Defendants’ Motion to Modify Order Appointing Mediator* [Dkt. No. 85] (the “Mediation Disclosure Motion”).

The Steering Committee, by and through its undersigned counsel, respectfully submits this joinder to the *Response of the ResCap Liquidating Trust and Residential Funding Co. to Defendants’ Motion to Modify Order Appointing Mediator* (the “Liquidating Trust Objection”). For the reasons set forth in the Liquidating Trust Objection, which the Steering Committee Group concurs with and joins, the Steering Committee respectfully requests that this Court deny the Mediation Disclosure Motion.<sup>2</sup>

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<sup>1</sup> The Steering Committee Group consists of AEGON USA Investment Management, LLC; Angelo, Gordon & Co., L.P.; Cascade Investment, LLC; Federal Home Loan Bank of Atlanta; Goldman Sachs Asset Management, L.P.; ING Investment Management Co. LLC; ING Investment Management, LLC; Bayerische Landesbank; BlackRock Financial Management Inc.; Kore Advisors, L.P.; Pacific Investment Management Company LLC; Metropolitan Life Insurance Company; Neuberger Berman Europe Limited; SNB StabFund; The TCW Group, Inc.; Teachers Insurance and Annuity Association of America; Thrivent Financial for Lutherans; Western Asset Management Company; and certain of their affiliates, either in their own capacities or as advisors or investment managers.

<sup>2</sup> The Steering Committee reserves the right to supplement, amend, alter or modify this joinder. The Steering Committee further reserves all rights to be heard before the Court with respect to the Mediation Disclosure Motion.

Dated: July 2, 2015  
New York, New York

/s/ Kathy D. Patrick

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