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The Honorable Martin Glenn, U.S.B.J.
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

**Re: In re Residential Capital, LLC, et. al., Case No. 12-12020 –
Claim No. 3759 Filed by Frank Reed**

Dear Judge Glenn:

This firm is counsel to the ResCap Borrower Claims Trust (the "Trust") and submits this response to the letter submitted by the claimant seeking a further extension of his time to respond to the Trust's written discovery requests. [D.E. 9851].

The Claimant omits certain material facts from his submission. Specifically, the Trust served Mr. Reed with discovery via electronic mail on March 15, 2016, which was returnable on April 15, 2016. He previously reached out to the Trust seeking an extension of time to respond, and the Trust agreed to a new response deadline of April 22, 2016.

Pursuant to the terms of the Scheduling Order in this contested matter [D.E. 9620], the Trust has until May 27, 2016 to complete its depositions of the 22 expert and fact witnesses identified by Mr. Reed on April 12. The discovery requested by the Trust is directly related to the evidence to be introduced through these witnesses. Accordingly, the Trust respectfully requests that Mr. Reed substantially complete his production no later than April 22, and produce any remaining documents within five (5) business days, and not be allowed any further extensions.

Respectfully Submitted,

/s/ Jordan A. Wishnew

Jordan A. Wishnew

