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Counsel for ResCap Borrower Claims Trust

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

In re:)	Case No. 12-12020 (MG)
RESIDENTIAL CAPITAL, LLC, et al.,)	Chapter 11
Debtors.)	Jointly Administered

**CERTIFICATE OF NO OBJECTION TO SECOND MOTION FOR ORDER
EXTENDING THE TERM OF THE RESCAP BORROWER CLAIMS TRUST**

The ResCap Borrower Claims Trust (“**Borrower Trust**”)¹, as successor to the debtors and debtors-in-possession in the above-captioned cases, hereby submits this *Certificate of No Objection to Second Motion for Order Extending the Term of the ResCap Borrower Claims Trust* (the “**Certificate**”), pursuant to Local Bankruptcy Rule 9075-2, and respectfully states:

1. On November 16, 2018, the *Second Motion for Order Extending the Term of the ResCap Borrower Claims Trust* was filed as Document Number 10595 (the “**Motion**”).

2. Pursuant to the Order dated May 23, 2012, establishing notice, case management and administrative procedures (Docket No. 141), notice of the Motion was provided by First-Class United States mail or electronic mail on November 16, 2018 and November 18, 2018, to

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



the parties and claimants listed on Exhibits A and B to the *Affidavit of Service* filed on November 27, 2018 as Document Number 10597.

3. The deadline for filing and objection or response to the Motion expired on November 30, 2018 (the “**Objection Deadline**”).

4. The Objection Deadline has now passed and counsel has reviewed the case docket not less than forty-eight (48) hours after expiration of the Objection Deadline, and is not aware of any objection, responsive pleading, or request for hearing with respect to the Motion that have been filed with the clerk or served on counsel for the Borrowers Trust.

5. The Borrowers Trust respectfully requests that the Court enter an order granting the Motion without further pleading or a hearing. A copy of the proposed Order that was attached to the Motion, modified to reflect that no Objections have been filed and, therefore, that no Hearing on the Motion is required, is submitted with this Certificate.

Dated: New York, New York
December 6, 2018

/s/ Daniel J. Flanigan

Daniel J. Flanigan

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**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
)	

**ORDER EXTENDING THE TERM OF THE
RESCAP BORROWER CLAIMS TRUST**

This matter coming before the Court on the motion (the “**Motion**”)¹ filed by the ResCap Borrower Claims Trust, which is successor in interest to the debtors (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases, for entry of an order pursuant to the terms of the *Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC et al. and the Official Committee of Unsecured Creditors* [Docket No. 6065-1] (the “**Chapter 11 Plan**”), extending the term of the Borrower Claims Trust for a period of two years from the fifth (5TH) anniversary of the Effective Date; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 11 U.S.C. § 105 and 28 U.S.C. § 1334 and the Amended Standing Order of Referral of Cases to Bankruptcy Court Judges of the District Court for the Southern District of New York, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2)(B); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and no other or further notice need be provided; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases

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set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as provided herein.
2. The duration of the Borrower Trust is extended up to and through and including December 17, 2020, without prejudice to the Borrower Trust's ability to (i) seek further extensions or (ii) terminate the Trust in accordance with the Plan and the Borrower Claims Trust Agreement.
3. The Court shall retain jurisdiction relating to the interpretation and implementation of this Order.

Dated: _____, 2018
New York, New York

THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE