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Counsel for ResCap Borrower Claims Trust

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

RESIDENTIAL CAPITAL, LLC, et al.,

Debtors.

Case No. 12-12020 (MG)

Chapter 11

Jointly Administered

CERTIFICATE OF NO OBJECTION TO THIRD 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 Third 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 9, 2020, the *Third Motion for Order Extending the Term of the*

ResCap Borrower Claims Trust was filed as Document Number 10694 (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 12, 2020 and November 13, 2020, to

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



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the parties and claimants listed on Exhibits A and B to the *Declaration of Service* filed on November 13, 2020 as Document Number 10698.

3. The deadline for filing and objection or response to the Motion expired on November 24, 2020 (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.

Dated: New York, New York December 1, 2020 /s/ Daniel J. Flanigan

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