

MORRISON | FOERSTER

FOERSTER

425 MARKET STREET
SAN FRANCISCO
CALIFORNIA 94105-2482

TELEPHONE: 415.268.7000
FACSIMILE: 415.268.7522

WWW.MOFO.COM

MORRISON FOERSTER LLP
BEIJING, BERLIN, BOSTON,
BRUSSELS, DENVER, HONG KONG,
LONDON, LOS ANGELES, NEW YORK,
NORTHERN VIRGINIA, PALO ALTO,
SAN DIEGO, SAN FRANCISCO, SHANGHAI
SINGAPORE, TOKYO, WASHINGTON, D.C.

July 22, 2021

Writer's Direct Contact
+1 (415) 268.7232
ALewis@mofocom

Hon. Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

Re: In re Residential Capital, LLC et al.
United States Bankruptcy Court
Southern District of New York
Jointly Administered Under Case No. 12-12020 MG

Dear Judge Glenn:

I am writing on behalf of the ResCap Liquidating Trust (the "Trust") in response to the June 11, 2021 letter to you from Mr. Mark Ferris of FoundAsset that was filed on June 21, 2021 as Docket No. 10717 (the "Letter"). The Trust was formed pursuant to the Second Amended Joint Chapter 11 Plan of Liquidation [etc.] (the "Plan") confirmed in the above-captioned cases (the "Cases") on December 11, 2013 by your order entered under Docket No. 6065. In the Letter, Mr. Ferris complains that the Trust has rejected his offer to pay the Trust \$50,000 to execute a quitclaim deed to certain property to which he asserts Trust as successor to debtor GMAC Mortgage, LLC may have some claim. His expressed purpose per the Letter is to get control of the property to convert it to a transaction for his own benefit (or that of the business he evidently owns or controls, FoundAsset).

The Trust has indeed rejected his offer and asked him not to approach it or its personnel again about the matter. The rejection letter (dated April 6, 2021) and subsequent email communications between Mr. Ferris and me that are attached to the Letter explain the Trust's reasons. Those reasons are, in summary that: (1) as it has reconfirmed, the Trust simply does not own the property (or have a mortgage on it); and (2) the Trust's brief under the plan does not include engaging in new business transactions (to put this latter point a little differently, the Trust does not believe that it is authorized to sell quit claim deeds to raise money).



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The Trust hopes this letter addresses any questions or concerns you may have arising from the Letter, as it prefers not to spend yet more resources wrestling with Mr. Ferris. Nevertheless, the Trust will, of course, readily provide any further information that it can that the Court may wish.

Sincerely,

/s/ Adam A Lewis

Adam A. Lewis
Senior Counsel

cc: Mr. Mark Ferris (Via Email)