

Hearing Date: Return date to be scheduled by the Court

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, *et al.*,

Debtors.

ROWENA DRENNEN, FLORA GASKIN, ROGER
TURNER, CHRISTIE TURNER, JOHN PICARD
AND REBECCA PICARD, individually and as the
representatives of the KESSLER SETTLEMENT
CLASS,

STEVEN AND RUTH MITCHELL, individually
and as the representatives of the MITCHELL
SETTLEMENT CLASS,

and

RESCAP LIQUIDATING TRUST,

Plaintiffs,

vs.

CERTAIN UNDERWRITERS AT LLOYD'S OF
LONDON, *et al.*,

Defendants.

Case No. 12-12020-shl

Chapter 11

Jointly Administered

Adv. Case No. 15-01025-dsj

**NOTICE OF RESCAP LIQUIDATING TRUST'S MOTION IN OPPOSITION TO
DEFENDANT CERTAIN UNDERWRITERS AT LLOYD'S OF LONDON'S
REQUEST TO CLAW BACK DOCUMENTS**



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PLEASE TAKE NOTICE that ResCap Liquidating Trust (the “Trust”) will move this Court before The Honorable David S. Jones, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York, to enter an Order denying Defendant Certain Underwriters at Lloyd’s of London’s (“Lloyd’s”) claw back request and require Lloyd’s to re-produce the documents at issue with unredacted reserve amounts. In support of this Motion, the Trust relies upon the arguments and authorities presented in its Motion in Opposition to Defendant Certain Underwriters at Lloyd’s, and exhibits thereto, and any Reply brief (if later submitted).

DATED: New York, New York
April 16, 2021

By: /s/ Vivek Chopra
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CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2021, I caused a true and correct copy of the foregoing document to be served upon all counsel of record registered with the Court's ECF system, by electronic service via the Court's ECF transmission facilities.

By: /s/ Janet Howe
PERKINS COIE LLP

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**[PROPOSED] ORDER REGARDING RESCAP LIQUIDATING TRUST'S
MOTION IN OPPOSITION TO DEFENDANT CERTAIN UNDERWRITERS AT
LLOYD'S OF LONDON'S REQUEST TO CLAW BACK DOCUMENTS**

The ResCap Liquidating Trust's Motion in Opposition to Defendant Certain Underwriters
at Lloyd's of London's Request to Claw Back Documents is granted. IT IS HEREBY

ORDERED THAT:

Defendant Certain Underwriters at Lloyd's of London's re-produce the documents at
issue with unredacted reserve amounts.

Dated: New York, New York
April __, 2021

Honorable David S. Jones
United States Bankruptcy Judge