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Counsel for the ResCap Liquidating Trust

**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

**CERTIFICATE OF NO OBJECTION REGARDING THE MOTION FOR AN
ORDER EXTENDING THE TERM OF THE RESCAP LIQUIDATING TRUST**

The ResCap Liquidating Trust (the “**Liquidating Trust**”), successor in interest to the debtors (the “**Debtors**”) in the above-captioned chapter 11 cases, hereby files this *Certificate of No Objection Regarding the Motion for an Order Extending the Term of the ResCap Liquidating Trust*, pursuant to Rule 9013-3 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York and in accordance with the *Order Under Bankruptcy Code Sections 102(1), 105(a) and 105(d), Bankruptcy Rules 1015(c), 2002(m) and 9007 and Local Bankruptcy Rule 2002-2 Establishing Certain Notice, Case Management and Administrative Procedures* [ECF No. 141] (the “**Case Management Order**”), and respectfully states:

1. On October 29, 2024, the ResCap Liquidating Trust filed the *Motion for an Order Extending the Term of the ResCap Liquidating* [ECF No. 10775] (the “**Motion**”). The hearing on the Motion is scheduled for November 26, 2024 at 10:00 a.m. (prevailing Eastern



Time).

2. In accordance with the Case Management Order, the Motion was served by electronic mail and/or First Class mail upon the Special and General Service Lists maintained by Kurtzman Carson Consultants, LLC d/b/a Verita Global and all affected parties on October 30, 2024.

3. The Motion set forth that objections to the Motion were to be filed and served so that they were actually received no later than November 19, 2024 at 5:00 p.m. (prevailing Eastern Time) (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 ResCap Liquidating Trust.

5. Accordingly, the ResCap Liquidating Trust respectfully requests that the Court enter the proposed order granting the Motion, a copy of which is attached hereto as Exhibit A.

Dated: November 21, 2022
New York, New York

KRAMER LEVIN NAFTALIS & FRANKEL LLP

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EXHIBIT A

Proposed Order

**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
)
-----)

ORDER EXTENDING THE TERM OF THE RESCAP LIQUIDATING TRUST

This matter coming before the Court on the motion (the “**Motion**”)¹ filed by the ResCap Liquidating 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 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 Liquidating Trust for an additional two years; 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 Declaration of Jill Horner in Support of the Motion; and the Court having determined that the legal

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

and factual bases 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 Liquidating Trust, as described in Section 12.1(a) of the Liquidating Trust Agreement, is extended through and including December 17, 2026, without prejudice to the Liquidating Trust's ability to (i) seek further extensions or (ii) dissolve the Liquidating Trust in accordance with the Chapter 11 Plan and the Liquidating Trust Agreement.
3. The Court shall retain jurisdiction relating to the interpretation and implementation of this Order.

Dated: _____, 2024
New York, New York

UNITED STATES BANKRUPTCY JUDGE