

POLSINELLI
Daniel J. Flanigan
600 Third Avenue, 42nd Floor
New York, New York 10016
(212) 644-2090
dflanigan@polsinelli.com

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 FIFTH 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 Fifth Motion for Order Extending the Term of the ResCap Borrower Claims Trust* (the “**Certificate**”), pursuant to Local Bankruptcy Rule 9013-3, and respectfully states:

1. On October 29, 2024, the *Fifth Motion for Order Extending the Term of the ResCap Borrower Claims Trust* was filed as Docket Number 10774 (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

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



United States Mail or electronic mail on October 29, 2024, to the parties and claimants listed on Exhibits A and B to the *Certificate of Service* filed on October 30, 2024, as Docket Number 10776.

3. The deadline for filing and objection or response to the Motion expired on November 19, 2024 (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
November 22, 2024

POLSINELLI

/s/ Daniel J. Flanigan
Daniel J. Flanigan
600 Third Avenue, 42nd Floor
New York, New York 10016
(212) 644-2090
Facsimile: (212) 684-0197
dflanigan@polsinelli.com

Counsel for ResCap Borrower Claims Trust