Docket #0003 Date Filed: 11/20/2012

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
MICHAEL A. FARR,	)	Adv. Case No. 12-01899 (MG)
Plaintiff,	)	
v.	)	
GMAC MORTGAGE, LLC, *et al.*,	)	
Defendants.	)	

STIPULATION AND ORDER BETWEEN
MICHAEL A. FARR AND GMAC MORTGAGE, LLC

WHEREAS, on May 14, 2012 (the "**Petition Date**"), GMAC Mortgage, LLC ("**GMACM**"), one of the above-captioned jointly administered debtors and debtors in possession (collectively, the "**Debtors**") filed a petition for relief under chapter 11, Title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of New York (the "**Bankruptcy Court**");

WHEREAS, on October 2, 2012, Michael A. Farr ("**Plaintiff**", together with GMACM, the "**Parties**"), by and through his undersigned counsel, commenced the above-captioned adversary proceeding against GMACM by filing an Adversary Complaint (the "**Complaint**") in the Bankruptcy Court in connection with real property located at 3950 Parian Ridge Road, Atlanta, Georgia, 30327 (the "**Property**");

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WHEREAS, a non-judicial foreclosure sale of the Property (the "**Foreclosure Sale**") was scheduled to be held on November 6, 2012;

WHEREAS, the deadline for GMACM to answer or otherwise respond to the Complaint was November 12, 2012 and a pre-trial conference (the "**Pre-Trial Conference**") has been scheduled for November 19, 2012 at 10:00 a.m. (Eastern);

WHEREAS, Plaintiff and GMACM have agreed on an extension of the response date and adjournment of the Pre-Trial Conference;

NOW, THEREFORE, in consideration of the foregoing recitals, which are incorporated into this Stipulation, and the covenants and conditions contained therein, **IT IS STIPULATED AND AGREED** by and between GMACM and Plaintiff as follows:

1. The date by which GMACM must file and serve its answer or otherwise respond to the Complaint is extended through and including November 26, 2012. The foregoing extension is without prejudice to GMACM's right to seek further extensions.

2. The Pre-Trial Conference shall be adjourned to January 29, 2013 at 10:00 a.m. (Eastern).

3. GMACM shall postpone the Foreclosure Sale for thirty (30) days and may, in its sole discretion, grant further postponements.

4. This Court shall retain jurisdiction to hear all matters or disputes arising from or related to this Stipulation and Order.

5. This Stipulation and Order may not be altered, modified or changed unless in writing signed by the Parties.

6. This Stipulation and Order may be executed in counterparts, each of which is deemed an original, but when taken together constitute one and the same document.

7. This Stipulation and Order will be effective immediately upon approval by the Court.

8. Each person who executes this Stipulation and Order on behalf of a Party hereto represents that he or she is duly authorized to execute this Stipulation and Order on behalf of such Party.

[Remainder of page intentionally left blank]

Dated: November 16, 2012

LEGACY LAW GROUP

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COUNSEL FOR GMAC MORTGAGE, LLC

SO ORDERED this 20th day
of November, 2012

/s/Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge

Signature page to Stipulation and Order between
Michael A. Farr and GMAC Mortgage, LLC