Docket #0007 Date Filed: 12/20/2012

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
AMERICAN RESIDENTIAL EQUITIES, LLC, in its own individual capacity and in its capacity as Trustee under that certain American Residential Equities, LLC Master Trust Agreement dated August 8, 2005	)	Adv. Case No. 12- 01934 (MG)
Plaintiff,	)	
v.	)	
GMAC MORTGAGE, LLC, as successor by merger to GMAC Mortgage Company, and BALBOA INSURANCE COMPANY	)	
Defendants.	)	

STIPULATION AND ORDER BETWEEN AMERICAN RESIDENTIAL EQUITIES, LLC AND GMAC MORTGAGE, LLC

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

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WHEREAS, on November 9, 2012, American Residential Equities, LLC in its own individual capacity and in its capacity as Trustee under that certain American Residential Equities LLC Master Trust Agreement dated August 8, 2005, as amended, ("**ARE**" or the "**Plaintiff**") commenced the above-captioned adversary proceeding against GMAC Mortgage by filing a complaint (the "**Complaint**") in the Bankruptcy Court;

WHEREAS, the deadline for GMAC Mortgage to answer or otherwise respond to the Complaint is December 10, 2012 and a pre-trial conference (the "**Pre-Trial Conference**") was originally scheduled for December 18, 2012 at 3:00 p.m. (Eastern);

WHEREAS, ARE and GMAC Mortgage have agreed on an extension of the response date and adjournment of the Pre-Trial Conference;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between GMAC Mortgage and ARE (collectively, the "**Parties**") as follows:

1. The date by which the Defendant must file and serve its answer or otherwise respond to the Complaint is extended through and including January 25, 2013. The foregoing extension is without prejudice to GMAC Mortgage's right to seek further extensions.

2. The Pre-Trial Conference shall be adjourned to February 28, 2013 at 2:00 p.m. (Eastern).

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

4. This Stipulation and Order may not be altered, modified or changed except by a writing signed by the Parties.

5. This Stipulation and Order may be executed in multiple counterparts, each of which shall be deemed an original but all of which when taken together shall constitute one and the same instrument.

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

7. 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.

[signature page follows]

Dated: December 11, 2012

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IT IS SO ORDERED.

Dated: New York, New York
December 20, 2012

/s/Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge