Docket #0005 Date Filed: 1/16/2013

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January 16, 2013

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Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, NY 10004

Re: GMAC Mortgage, LLC's Request for Extension of Deadline to Respond in Adversary Proceeding *Lytle v. GMAC Mortgage, LLC, et al.*, Adversary No. 12-02069 (MG)

Dear Judge Glenn:

We are counsel to Residential Capital, LLC, Residential Funding Company, LLC ("**RFC**") and their debtor affiliates (collectively, the "**Debtors**") in their jointly administered chapter 11 bankruptcy cases, Case No. 12-12020 (MG), and in the above-captioned adversary proceeding (the "**Adversary Proceeding"**) initiated by Derrick Lytle (the "**Plaintiff**"). The thirty-day period from the date of issuance of the summons, by which all Defendants must respond to the complaint filed by the Plaintiff (the "**Complaint**") will, assuming proper service of the Complaint,[1] run on January 22, 2013.

We write to request the Court enter an order extending the date by which all Defendants must answer or otherwise respond to the Complaint by approximately forty-five days (until March 8, 2013), and rescheduling the pretrial conference currently scheduled for January 29, 2013 to the next omnibus hearing after the extended response date. The Debtors are requesting an extension in part to provide SilvermanAcampora LLP, appointed as special borrowers' counsel to the Official Committee of Unsecured Creditors, with time to review the Complaint and reach out to the Plaintiff, as has previously been discussed with the Court in connection with other adversary proceedings. Additionally, because the Complaint names a number of other Defendants including at least one current or former employee, for

[1] The Debtors have not yet received confirmation that the Plaintiff has properly served the Complaint and summons. The Debtors expressly reserve the right to object in any answer or other responsive pleading to the sufficiency of the Plaintiff's service of process, if and when effectuated, or any procedural deficiencies in connection with such service of process.

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purposes of administrative convenience the Debtors request that the Court extend the time for all Defendants to respond to the Complaint.

Pursuant to Bankruptcy Rule 9006(b)(1), the Court may extend the time for any act required by the Bankruptcy Rules (with limited exceptions not relevant here) "for cause shown . . . with or without motion or notice." The Debtors have attempted to contact the Plaintiff directly to request an extension, but have not yet obtained a response.[2]

For the foregoing reasons, the Debtors respectfully request that the Court extend the defendants' deadline to answer or otherwise respond to the Complaint until March 8, 2013 and reschedule the pre-trial conference to the omnibus hearing scheduled on March 21, 2013 or such other date as the Court may set at its convenience.

Respectfully submitted,

/s/Norman S. Rosenbaum

Norman S. Rosenbaum

[2] Counsel informed Plaintiff that the Debtors would be required to request an extension from the Court to the extent that no agreement could be reached regarding a consensual extension.