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Delivered via Email and ECF

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 *Hawthorne v. GMAC Mortgage, LLC, et al.*, Adversary No. 12-02050 (MG)

Dear Judge Glenn:

We are counsel to GMAC Mortgage, LLC ("**GMACM**") and its 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 Gwendolyn B. Hawthorne (the "**Plaintiff**"). As directed by the Court at the omnibus hearing held on December 20, 2012, the Debtors submitted an order extending the deadline for each of the named defendants to the Adversary Proceeding (the "**Defendants**") to answer or otherwise respond to the complaint filed by the Plaintiff (the "**Complaint**") through and including February 1, 2013, which was entered by the Court on January 3, 2013 (ECF # 4).

We write to request that the Court enter an order further extending the date by which all Defendants must answer or otherwise respond to the Complaint by approximately sixty (60) days (until April 2, 2013), and rescheduling the pretrial conference to the next omnibus hearing date after the extended response date (April 11, 2013). The Debtors are requesting an extension in part to provide SilvermanAcampora LLP, appointed as special borrowers' counsel to the Official Committee of Unsecured Creditors (in such capacity "**Special Borrowers' Counsel**"), with additional time to reach out to the Plaintiff, as had been discussed at the December 20th hearing.

To date, Special Borrowers' Counsel has communicated with the Plaintiff regarding a potential consensual resolution of the Adversary Proceeding. The Debtors have requested additional information from the Plaintiff in order to determine whether a consensual

resolution can be accomplished. The Debtors believe it is appropriate to further extend the response deadline to allow the Plaintiff and the Debtors time to attempt to reach a consensual resolution of the Adversary Proceeding. The Debtors believe the requested sixty (60) day extension is appropriate because it will provide (i) the Plaintiff with thirty (30) days to submit the requested documentation, and (ii) the Debtors with thirty (30) days to evaluate the documentation and determine whether a settlement can be reached. Additionally, because the Complaint names a number of other Defendants, including at least one current or former Debtor employee or agent, for 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." In addition, Special Borrowers' Counsel has also attempted to contact the Plaintiff directly to request an extension, but has not yet obtained a response.[1]

For the foregoing reasons, the Debtors respectfully request that the Court extend the Defendants' deadline to answer or otherwise respond to the Complaint until April 2, 2013 and reschedule the pre-trial conference to the omnibus hearing scheduled on April 11, 2013 or such other date as the Court may set at its convenience. A proposed form of order granting such extension is enclosed.

Respectfully submitted,

/s/Norman S. Rosenbaum

Norman S. Rosenbaum

Enclosure

cc: Ronald J. Friedman, Esq.
Justin S. Krell, Esq.

[1] Special Borrowers' Counsel informed the 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.

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
Gwendolyn B. Hawthorne	)	
Plaintiff,	)	
v.	)	Adv. No. 12-02050 (MG)
GMAC Mortgage, LLC, U.S. Bank National Association, GMFS LLC, Judy Faber, Vice President, Brenda Guidry, and Mortgage Electronic Registration System Inc., and Duane Thompson, Assistant Secretary Mortgage Electronic Registration Systems Inc, as Nominee for GMFS, LLC	)	
Defendants.	)	

SECOND ORDER EXTENDING DEFENDANTS' DEADLINE TO ANSWER OR OTHERWISE RESPOND TO ADVERSARY COMPLAINT

Upon the request (the "**Request**") of GMAC Mortgage, LLC ("**GMAC Mortgage**"), one of the above-captioned debtors and debtors in possession, to extend the deadline for each of the above-captioned defendants (the "**Defendants**") to answer or otherwise respond to the complaint filed in the within adversary proceeding; and it appearing that this Court has jurisdiction to consider the Request pursuant to 28 U.S.C. §§ 157 and 1334; and after due deliberation thereon; it is hereby:

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Request is GRANTED as provided in this Order.

2. The deadline for each Defendant to file an answer or otherwise respond to the complaint in this adversary proceeding is hereby extended through and including April 2, 2013.

3. The pre-trial conference in the adversary proceeding is hereby adjourned to April 11, 2013 at 10:00 a.m. (prevailing Eastern time).

4. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

Dated: January __, 2013
New York, New York

THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE