Docket #0017 Date Filed: 2/1/2013

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 BALBOA INSURANCE COMPANY

WHEREAS, on May 14, 2012 (the "**Petition Date**"), GMAC Mortgage, LLC ("**GMAC Mortgage**"), one of the above-captioned jointly administered debtors and debtors in possession filed a petition for relief under chapter 11 of title 11 of the United States Code in this 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**"), commenced the above-captioned adversary proceeding against GMAC Mortgage and Balboa Insurance Company ("**Balboa**") by filing a complaint (the "**Complaint**") in this Court;

WHEREAS, the deadline for Balboa to answer or otherwise respond to the Complaint is February 1, 2013;

WHEREAS, a Pre-Trial Conference is scheduled in this proceeding for February 28, 2013, at 2:00 p.m.;

WHEREAS, ARE and Balboa have agreed on an extension of time for Balboa to answer or otherwise respond to the Complaint;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between Balboa and ARE, as follows:

1. The date by which Balboa must file and serve its answer or otherwise respond to the Complaint is extended through and including February 27, 2013. The foregoing extension is without prejudice to Balboa's right to seek further extensions.
2. This Stipulation and Order will be effective immediately upon approval by the Court.
3. 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.

Dated: January 29, 2013

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COUNSEL FOR BALBOA INSURANCE COMPANY

IT IS SO ORDERED.

Dated: February 1, 2013
New York, New York

/s/Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge