Docket #0009 Date Filed: 12/19/2012

UNITED STATE BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SEALINK FUNDING LIMITED, Plaintiff, v. DEUTSCHE BANK AG; DEUTSCHE BANK SECURITIES, INC.; DB STRUCTURED PRODUCTS INC.; ACE SECURITIES CORP.; and DEUTSCHE ALT-A SECURITIES INC., Defendants.	**Hearing Date and Time: March 5, 2013 at 10:00 a.m. (prevailing Eastern Time)** **Objection Deadline (by stipulation): January 23, 2013** **Reply Deadline (by stipulation): February 6, 2013** Adv. Proc. No. 12-ap-02051 Oral Argument Requested

NOTICE OF PLAINTIFF'S MOTION TO REMAND TO NEW YORK STATE SUPREME COURT

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. On December 19, 2012, Adversary Proceeding Plaintiff ("**Plaintiff**") of the above-captioned adversary proceeding, which was referred to the Residential Capital Chapter 11 Proceeding, Case No. 12-02020, United States Bankruptcy Court, Southern District of New York (the "**ResCap Chapter 11 Proceeding**"), filed the attached Motion to Remand To New York State Supreme Court pursuant to 28 U.S.C. § 1334(b) and 28 U.S.C. § 1334(c) for an Order remanding this action to the Supreme Court of the State of New York, New York County, and for any such other relief as this Court may deem just and proper (the "**Motion**").

2. A hearing (the "**Hearing**") to consider the motion shall be held before the Honorable Martin Glenn, United States Bankruptcy Judge, in Room 501 of the United States Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York, 10004, on **March 5, 2013 at 10:00 a.m.** (prevailing Eastern Time).

3. Any objections to the Motion must be made in writing, filed with the Court (with a copy to Chambers) and served in accordance with the Order Under Bankruptcy Code Sections 102(1), 105(a), and 105(d), Bankruptcy Rules 1015(c), 2002(m) and 9007, and Local Bankruptcy Rule 2002-2 Establishing Certain Notice, Case Management, and Administrative Procedures [Docket No. 141] (the "**Case Management Order**"), and served upon the Special Service List, as that term is defined in the Case Management Order, so as to be actually received no later than **January 23, 2013 at 4:00 p.m.** (prevailing Eastern Time) (the "**Objection Deadline**"), as

stipulated by the parties and ordered by the Court on December 6, 2012.

4. If no objections to the Motion are timely filed and served on or before the Objection Deadline, Plaintiff may submit to the Bankruptcy Court an order substantially in the form of the proposed order attached to the Motion as **Exhibit A** (the "**Proposed Order**").

Dated: December 19, 2012
New York, New York

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

/s/ David L. Wales

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Counsel for Plaintiff Sealink Funding Limited

EXHIBIT A

UNITED STATE BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SEALINK FUNDING LIMITED, Plaintiff, v. DEUTSCHE BANK AG; DEUTSCHE BANK SECURITIES, INC.; DB STRUCTURED PRODUCTS INC.; ACE SECURITIES CORP.; and DEUTSCHE ALT-A SECURITIES INC., Defendants.	Adv. Proc. No. 12-ap-02051

[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION TO REMAND TO NEW YORK STATE SUPREME COURT

Having considered Plaintiff's Motion to Remand to New York State Supreme Court, the Memorandum of Law and Declaration submitted in support thereof, and all papers filed and arguments made in opposition thereto, and for good cause show, IT IS HEREBY ORDERED THAT Plaintiff's Motion to Remand to New York State Supreme Court is GRANTED and this case is remanded to the Supreme Court of the State of New York, County of New York.

SO ORDERED THIS ____ day of _____, 20___.

_____

Hon. Martin Glenn
United States Bankruptcy Judge
Southern District of New York