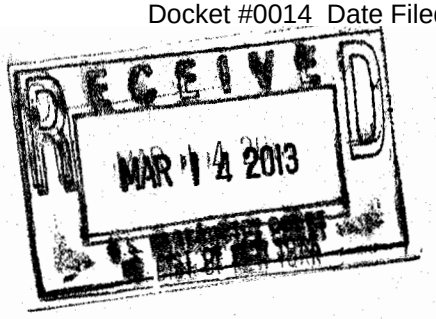


Jennifer L. Wilson, *Sui Juris*
4365 School House Commons, 500-251
Harrisburg, NC 28075
Ph.: 704-773-1712

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Jennifer L. Wilson,

Plaintiff,

v.

Residential Capital, LLC, et al.

Defendants.

In re

RESIDENTIAL CAPITAL, LLC et al.,

Debtors,

ADV. CASE: 12-01936-MG

CASE NO: 12-12020

Chapter 11

Jointly Administered

Date: March 21, 2013
Time: 2:00 p.m.
Crt. Rm..: 501

[Concurrently filed: Plaintiff's Objection to Declaration of Jennifer Scoliard, In-House Senior Bankruptcy Counsel at Residential Capital, LLC, In Support of Debtors' Motion for Dismissal of Adversary Proceeding Pursuant to Bankruptcy Rule 7012(b) and FRCP 12(b)(1) and 12(b)(6) or, in the Alternative, Permissive Abstention Pursuant to 28 U.S.C. § 1334(c)(1)].

PLAINTIFF'S OPPOSITION TO DEBTORS' MOTION FOR DISMISSAL OF ADVERSARY PROCEEDING PURSUANT TO BANKRUPTCY RULE 7012(B) AND FRCP 12(B)(1) AND 12 (B)(6) OR, IN THE ALTERNATIVE, PREMISSIVE ABSTENTION PURSUANT TO 28 U.S.C. § 1334(C)(1)



COME NOW Jennifer L. Wilson (hereinafter "Wilson") respectfully requests this Court deny "DEBTORS' MOTION FOR DISMISSAL OF ADVERSARY PROCEEDING PURSUANT TO BANKRUPTCY RULE 7012(b) AND FRCP 12(b)(1) AND 12(B)(6) OR, IN THE ALTERNATIVE, PERMISSIVE ABSTENTION PURSUANT TO 28 U.S.C. § 1334(C)(1)"

RELIEIF REQUESTED

WHEREFORE Jennifer L. Wilson respectfully requests the Court:

a. Deny ""DEBTORS' MOTION FOR DISMISSAL OF ADVERSARY PROCEEDING PURSUANT TO BANKRUPTCY RULE 7012(b) AND FRCP 12(b)(1) AND 12(B)(6) OR, IN THE ALTERNATIVE, PERMISSIVE ABSTENTION PURSUANT TO 28 U.S.C. § 1334(C)(1)"; or in the alternative
b. Grant plaintiff, Jennifer L. Wilson leave to amend the Complaint.

Date: March 13, 2013

Respectfully,

Jennifer L. Wilson

Jennifer L. Wilson, *Sui Juris*
4365 School House Commons, 500-251
Harrisburg, NC 28075
Ph.: 704-773-1712

RECEIVED
MAR 14 2013
U.S. BANKRUPTCY COURT
SDNY DIST. OF NEW YORK

CERTIFICATE OF SERVICE

I, Jennifer L. Wilson, plaintiff in the above captioned action, certify:

That on 14th day of March 2013, I served a true copy of the "PLAINTIFF'S OBJECTION TO DECLARATION OF JENNIFER SCOLIARD, IN-HOUSE SENIOR BANKRUPTCY COUNSEL AT RESIDENTIAL CAPITAL , LLC IN SUPPORT OF DEBTOR'S MOTION FOR DISMISSAL OF ADVERSARY PROCEEDING PURSUANT TO BANKRUPTCY RULE 7012(b) AND FRCP 12(b)(1) AND 12(b)(6) OR, IN THE ALTERNATIVE PERMISSIVE ABSTENTION PURSUANT TO 28 U.S.C. § 1334(c)(1)"; and "MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S OBJECTION TO DECLARATION OF JENNIFER SCOLIARD, IN-HOUSE SENIOR BANKRUPTCY COUNSEL AT RESIDENTIAL CAPITAL, LLC, IN SUPPORT OF DEBTORS' MOTION FOR DISMISSAL OF ADVERSARY PROCEEDING PURSUANT TO BANKRUPTCY RULE 7012(b) AND FRCP 12(b)(1) AND 12(b)(6) OR, IN THE ALTERNATIVE, PERMISSIVE ABSTENTION PURSUANT TO 28 U.S.C. §1334(c)(1)".

By email on the following shown in Exhibit A attached hereto and incorporated herein by reference.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on March 13, 2013

Jennifer L. Wilson

Jennifer L. Wilson, *Sui Juris*
4365 School House Commons, 500-251
Harrisburg, NC 28075
Ph.: 704-773-1712

EXHIBIT A

NAME	NAME NOTICED	EMAIL	DESCRIPTION
Morrison & Foerster LLP	Norman S. Rosenbaum Stefan W. Engelhardt Samantha L. Martin Tammy Hamzehpour	nrosenbaum@mofo.com sengelhardt@mofo.com smartin@mofo.com Tammy.Hamzehpour@gmacrescap.com; diane.citron@ally.com	Residential Capital LLC
Office of the United States Trustee for the Southern District of New York	Tracy Hope Davis Linda A. Riffkin Brian S. Masumoto	Tracy.Davis2@usdoj.gov Linda.Riffkin@usdoj.gov Brian.Masumoto@usdoj.gov	Office of the United States Trustee for the Southern District of New York
Office of the United States Attorney General, U.S. Department of Justice	Eric H. Holder, Jr.	AskDOJ@usdoj.gov	Office of the United States Attorney General
Office of the New York State Attorney General	Nancy Lord Enid N. Stuart	Nancy.Lord@OAG.State.NY.US enid.stuart@OAG.State.NY.US	Office of the New York Attorney General
Office of the U.S. Attorney for the Southern District of New York	Joseph N. Cordaro	joseph.cordaro@usdoj.gov	Counsel to the United State of America
Kirkland & Ellis LLP	Richard M. Cieri Ray C Schrock Stephen E Hessler	richard.cieri@kirkland.com ray.schrock@kirkland.com stephen.hessler@kirkland.com	Counsel to the Equity Security Holders (Ally Financial and Ally Bank)
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Clifford Chance US LLP	Jennifer C. DeMarco Adam Lesman	jennifer.demarco@cliffordchance.com adam.lesman@cliffordchance.com	Counsel to Ocwen Loan Servicing LLC

NAME	NAME NOTICED	EMAIL	DESCRIPTION
Munger, Tolles & Olson LLP	Thomas Walper Seth Goldman	Thomas.Walper@mto.com Seth.Goldman@mto.com	counsel for Berkshire Hathaway Inc.
Securities and Exchange Commission NY Regional Office	George S. Canellos	secbankruptcy@sec.gov;newyork@sec.gov; bankruptcynoticeschr@sec.gov	SEC Regional Dir.
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Citibank NA	Bobbie Theivakumaran	bobbie.theivakumaran@citi.com	Secured lender under the Mortgage Servicing Rights Facility
Deutsche Bank Trust Company Americas	Kelvin Vargas	kelvin.vargas@db.com	Indenture Trustee to Unsecured Notes / Top 50 Creditor
Fannie Mae	Peter McGonigle	peter_mcgonigle@fanniemae.co	Prepetition Lender - Fannie EAF
Kelley Drye & Warren LLP	James S Carr Eric R Wilson	kdwbankruptcydepartment@kelleydrye.com	Counsel to UMB Bank N.A. as Successor Indenture Trustee to the Debtors' Prepetition Junior Secured Notes
Milbank, Tweed, Hadley & McCloy LLP	Gerard Uzzi	guzzi@milbank.com	Co-Counsel to Ad Hoc Group of Junior Secured Noteholders
Securities & Exchange Commission	Secretary of the Treasury	secbankruptcy@sec.gov	Securities and Exchange Commission - Headquarters