Docket #0028 Date Filed: 4/2/2013

HEARING DATE: MAY 14, 2013 AT 10:00 A.M. EST
OBJECTION DEADLINE: APRIL 23, 2013 AT 4:00 P.M. EST

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AIG Asset Management (U.S.), LLC. et al.,
Allstate Insurance Company, et al.,
Massachusetts Mutual Life Insurance Company, and
Prudential Insurance Company of America, et al.

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
RESIDENTIAL CAPITAL, LLC, et al., **Plaintiffs,** v. ALLSTATE INSURANCE COMPANY, et al., **Defendants.**	Adv. Case No. 13-01262 (MG)

NOTICE OF MOTION OF AIG ASSET MANAGEMENT (U.S.), LLC, THE ALLSTATE ENTITIES, MASSACHUSETTS MUTUAL LIFE INSURANCE COMPANY, AND THE PRUDENTIAL ENTITIES FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, on April 2, 2013, AIG Asset Management (U.S.), LLC and affiliated entities (collectively, "AIG"), Allstate Insurance Company and affiliated entities (collectively, "Allstate"), Massachusetts Mutual Life Insurance Company ("Mass Mutual"), and

Prudential Insurance Company of America and affiliated entities (collectively, "Prudential," and, with AIG, Allstate, and Mass Mutual, the "Investors"), holders of general unsecured claims against Residential Capital, LLC and its debtor-subsidiaries ("the Debtors"), by and through their undersigned counsel, filed a motion (the "Motion")[1] seeking summary judgment on all counts of the Complaint, dated February 19, 2013, filed by the Debtors commencing the above-captioned adversary proceeding.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 501, One Bowling Green, New York, New York 10004 (the "Bankruptcy Court") is currently scheduled for **May 14, 2013 at 10:00 a.m.** (prevailing Eastern time), or as soon thereafter as counsel may be heard.[2]

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion and the relief requested therein must be made in writing, filed with the Bankruptcy Court (with a copy to Chambers) in accordance with the Order Under Bankruptcy Code Sections 102(1), *105(a),* and *105(d),* Bankruptcy Rules 10 15(c), 2002(m), and 9007, and Local Bankruptcy Rule 2002-2 Establishing Certain Notice, Case Management and Administrative Procedures entered by this Court on May 23, 2012 (Doc. 141) (the "Case Management Order"), and served in accordance with the Case Management Order, so as to be received no later than **April 23, 2013 at 4:00 p.m. (prevailing Eastern time).**

[1] Capitalized terms used herein and not otherwise defined herein shall have the meanings set forth in the Motion.

[2] Counsel to the Investors has requested that the hearing be adjourned approximately seven days. This request is pending.

PLEASE TAKE FURTHER NOTICE that the relief requested in the Motion may be granted without a hearing if no objection is timely filed and served as set forth above and in accordance with the Case Management Order.

Dated: April 2, 2013
New York, New York

QUINN EMANUEL URQUHART & SULLIVAN, LLP

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