Docket #0030 Date Filed: 4/2/2013

Hearing Date: May 23, 2013 at 2:00 p.m. (Prevailing Eastern Time)
Opposition Deadline: April 23, 2013
Reply Deadline: May 7, 2013

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: RESIDENTIAL CAPITAL, LLC, *et al*., Debtors.	Chapter 11 Case No. 12-12020 (MG) (Jointly Administered)
RESIDENTIAL CAPITAL, LLC; DITECH, LLC; DOA HOLDING PROPERTIES, LLC; DOA PROPERTIES IX (LOTS-OTHER), LLC; EPRE LLC; EQUITY INVESTMENTS I, LLC; ETS OF VIRGINIA, INC.; ETS OF WASHINGTON, INC.; EXECUTIVE TRUSTEE SERVICES LLC; GMAC – RFC HOLDING COMPANY, LLC; GMAC MODEL HOME FINANCE I, LLC; GMAC MORTGAGE USA CORPORATION; GMAC MORTGAGE, LLC; GMAC RESIDENTIAL HOLDING COMPANY, LLC; GMAC RH SETTLEMENT SERVICE, LLC; GMACM BORROWER LLC; GMACM REO LLC; GMACR MORTGAGE PRODUCTS, LLC; HFN REO SUB II, LLC; HOME CONNECTS LENDING SERVICES, LLC; HOMECOMINGS FINANCIAL REAL ESTATE HOLDINGS, LLC; HOMECOMINGS FINANCIAL, LLC; LADUE	Adv. Pro. No. 13-01262 (MG)

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ASSOCIATES, INC.; PASSIVE ASSET TRANSACTIONS, LLC; PATI A, LLC; PATI B, LLC; PATI REAL ESTATE HOLDINGS, LLC; RAHI A, LLC; RAHI B, LLC; RAHI REAL ESTATE HOLDINGS, LLC; RCSFJV2004, LLC; RESIDENTIAL ACCREDIT LOANS, INC.; RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC.; RESIDENTIAL ASSET SECURITIES CORPORATION; RESIDENTIAL CONSUMER SERVICES OF ALABAMA, LLC; RESIDENTIAL CONSUMER SERVICES OF OHIO, LLC; RESIDENTIAL CONSUMER SERVICES OF TEXAS, LLC; RESIDENTIAL CONSUMER SERVICES, LLC; RESIDENTIAL FUNDING COMPANY, LLC; RESIDENTIAL FUNDING MORTGAGE EXCHANGE, LLC; RESIDENTIAL FUNDING MORTGAGE SECURITIES I, INC.; RESIDENTIAL FUNDING MORTGAGE SECURITIES II, INC.; RESIDENTIAL FUNDING REAL ESTATE HOLDINGS, LLC; RESIDENTIAL MORTGAGE REAL ESTATE HOLDINGS, LLC; RFC – GSAP SERVICER ADVANCE, LLC; RFC ASSET HOLDINGS II, LLC; RFC ASSET MANAGEMENT, LLC; RFC BORROWER LLC; RFC CONSTRUCTION FUNDING, LLC; RFC REO LLC; and RFC SFJV- 2002, LLC,

Plaintiffs,

v.

ALLSTATE INSURANCE COMPANY; ALLSTATE LIFE INSURANCE CO.; ALLSTATE NEW JERSEY INSURANCE CO.; AIG ASSET MANAGEMENT (U.S.), LLC;

Defendants.

NOTICE OF MOTION OF LEAD PLAINTIFF, FOR ITSELF AND ON BEHALF OF THE CERTIFIED CLASS, FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that on April 2, 2013, New Jersey Carpenters Health Fund (the "Lead Plaintiff"), for itself and on behalf of the certified class of purchasers (the "Certified Class") defined and certified in the consolidated securities class action styled as *New Jersey*

Carpenters Health Fund, et al., on Behalf of Themselves and All Others Similarly Situated v. Residential Capital, LLC, et al., pending in the United States District Court for the Southern District of New York, Case No. 08-CV-8781 (HB) (the "Class Action"), filed the attached *Motion of Lead Plaintiff, for Itself and on Behalf of the Certified Class, for Summary Judgment* (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion shall be held on **May 23, 2013 at 2:00 p.m. (Prevailing Eastern Time)**, or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, One Bowling Green, New York, New York, before the Honorable Martin Glenn in courtroom 501.

PLEASE TAKE FURTHER NOTICE that opposition, if any, to the Motion must be made in writing, state with particularity the grounds therefor, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and be filed with the Court electronically in accordance with General Order M-399 (General Order M-399 and the User's Manual for the Electronic Case Filing System can be found at www.nysb.uscourts.gov, the official website for the Court) by registered users of the Court's case filing system, and by all other parties in interest, on a 3.5 inch disk or CD-ROM, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers) and served 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* (the "Case Management Order") [Docket No. 141], **so as to be actually received no later than April 23, 2013 (the "Opposition Deadline")** by (i) Lowenstein Sandler LLP, bankruptcy

counsel for Lead Plaintiff and the Certified Class, 65 Livingston Avenue, Roseland, NJ 07068 (Attn: Michael S. Etkin, Esq., John K. Sherwood, Esq., and Andrew Behlmann, Esq.); (ii) Curtis, Mallet-Prevost, Colt & Mosle LLP, conflicts counsel for the above-captioned debtors and debtors-in-possession, 101 Park Avenue, New York, NY 10178-0061 (Attn: Theresa Foudy, Esq.); (iii) Quinn Emanuel Urquhart & Sullivan, LLP, counsel for 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., 51 Madison Avenue, 22nd Floor, New York, NY 10010 (Attn: Susheel Kirpalani, Esq. and Scott C. Shelley, Esq.) and 865 South Figueroa Street, Los Angeles, California 90017 (Attn: Eric D. Winston, Esq. and Jeremy D. Andersen, Esq.); and (iv) Zuckerman Spaeder LLP, counsel to National Credit Union Administration Board as Liquidating Agent for Western Corp. Federal Credit Union and U.S. Central Federal Credit Union, 1800 M Street, NW, Washington, D.C. 20036-5802 (Attn: Nelson C. Cohen, Esq. and Graeme Bush, Esq.) and any other parties required to be served pursuant to the Case Management Order. Replies, if any, to any opposition to the Motion must be filed and served in accordance with the foregoing, **so as to be actually received no later than May 7, 2013 (the "Reply Deadline")**.

[*signature page follows*]

Dated: April 2, 2013
New York, New York

Respectfully submitted,

/s/ Michael S. Etkin

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