Docket #0005 Date Filed: 5/2/2013

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
UNIVERSAL RESTORATION SERVICES, INC.,	)	Adv. Case No. 13-01278 (MG)
Plaintiff,	)	
v.	)	
GMAC MORTGAGE, LLC,	)	
Defendant.	)	

STIPULATION AND ORDER BETWEEN UNIVERSAL RESTORATION SERVICES, INC. AND GMAC MORTGAGE, LLC

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 (collectively, the "**Debtors**") filed a petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of New York (the "**Bankruptcy Court**");

WHEREAS, on March 1, 2013, Universal Restoration Services, Inc. ("**Plaintiff**", together with GMAC Mortgage, the "**Parties**"), by and through its undersigned counsel, commenced the above-captioned adversary proceeding against GMAC Mortgage by filing an Adversary Complaint (the "**Complaint**");

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WHEREAS, per the April 3, 2013 Stipulation and Order issued in the Adversary Proceeding, the deadline for GMAC Mortgage to answer or otherwise respond to the Complaint is May 3, 2013 and a pre-trial conference (the "**Pre-Trial Conference**") has been scheduled for May 14, 2013 at 10:00 a.m. (Eastern);

WHEREAS, Plaintiff and GMAC Mortgage have agreed on an extension of the response date and adjournment of the Pre-Trial Conference;

NOW, THEREFORE, in consideration of the foregoing recitals, which are incorporated into this Stipulation, and the covenants and conditions contained therein, **IT IS STIPULATED AND AGREED** by and between GMAC Mortgage and Plaintiff as follows:

1. The date by which GMAC Mortgage must file and serve its answer or otherwise respond to the Complaint is extended through and including June 3, 2013. The foregoing extension is without prejudice to GMAC Mortgage's right to seek further extensions.

2. The Pre-Trial Conference shall be adjourned to June 12, 2013 at 10:00 a.m. (Eastern). The foregoing adjournment is without prejudice to either party's right to seek further adjournments.

3. This Court shall retain jurisdiction to hear all matters or disputes arising from or related to this Stipulation and Order.

4. This Stipulation and Order may not be altered, modified, or changed unless in writing signed by the Parties.

5. This Stipulation and Order may be executed in multiple counterparts, each of which will be deemed an original, and all of which when taken together shall constitute one and the same document.

6. This Stipulation and Order will be effective immediately upon approval by the Court.

7. 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: May 1, 2013

MORRISON & FOERSTER LLP

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COUNSEL FOR UNIVERSAL RESTORATION SERVICES, INC.

SO ORDERED

Dated: May 2, 2013
New York, New York

/s/Martin Glenn
MARTIN GLENN
United States Bankruptcy Judge

Signature page to Stipulation and Order between Universal Restoration Services, Inc. and GMAC Mortgage, LLC