Wendy Alison Nora
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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
WENDY ALISON NORA, Plaintiff,	Adv. Case No. 13-01208 (MG)
v.	
RESIDENTIAL CAPITAL, LLC, *et al.*, Defendants.	

Motion to Approve Late-Filing of Joint Progress Report

Plaintiff Wendy Alison Nora ("Plaintiff") moves the Court to accept the attached Progress Report pursuant to the Mandatory Supplemental AP Procedures for AP Actions ("Supplemental AP Procedures") entered by the Bankruptcy Court in the above-captioned chapter 11 cases on March 22, 2013 [Docket No. 3293], as amended on April 22, 2013, [Docket No. 3490], and the Notice of Applicability of The Order Approving Mandatory Supplemental AP Procedures filed in this Adversary Proceeding on April 12, 2013 [Docket No. 5]. Plaintiff was in a court proceeding on the afternoon of July 3, 2013 and then was meeting with clients until after the deadline for the submission of the Joint Progress Report, July 3, 2013 at 5:00 p.m. EDT.

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The parties have been diligent in working to settle the Plaintiff's claims and were working together to reschedule the conference now set for July 10, 2013 so that they may continue to discuss settlement of the Plaintiff's claims against the Defendant-Debtors when Plaintiff had to leave her office to attend a court proceeding. The Joint Progress Report attached hereto as Exhibit A was drafted by counsel for the Debtor-Defendants and is acceptable to the Plaintiff, but was not received in time for the filing deadline on July 3, 2013.

Plaintiff does not believe that any interested party will be harmed by the approval of the late-filing of the Joint Progress Report attached hereto, which Debtor-Defendants drafted and submitted for review of the Plaintiff after she had left her office for the court proceeding. At the time of this filing, she does not have the authority of the Debtor-Defendants to affix their counsel's electronic signature, but she has affixed her electronic signature to the attached Joint Progress Report, in hope that the Court will accept the late filing of the fully executed version of the Joint Progress Report when Debtor-Defendants' counsel is available to execute it.

WHEREFORE, the Plaintiff moves the Court to approve the late-filing of the Joint Progress Report when it is fully executed.

Dated: July 4, 2013 at
Madison, Wisconsin

/s/ Wendy Alison Nora
Wendy Alison Nora
Office Address:
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EXHIBIT A

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Gary S. Lee
Norman S. Rosenbaum
Paul Galante

Counsel for the Debtors and Debtors in Possession

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
WENDY ALISON NORA,	Adv. Case No. 13-01208 (MG)
Plaintiff,	
v.	
RESIDENTIAL CAPITAL, LLC, *et al.*,	
Defendants.	

Joint Progress Report

Defendant Residential Capital, LLC ("Defendant"), a debtor and debtor in possession in the above-captioned chapter 11 case, and plaintiff Wendy Alison Nora ("Plaintiff") hereby submit the following Progress Report pursuant to the Mandatory Supplemental AP Procedures for AP Actions ("Supplemental AP Procedures") entered by the Bankruptcy Court in the above-captioned chapter 11 cases on March 22, 2013 [Docket No. 3293], as amended on April 22,

2013, [Docket No. 3490], and the Notice of Applicability of The Order Approving Mandatory Supplemental AP Procedures filed in this Adversary Proceeding on April 12, 2013 [Docket No. 5].

On May 21, 2013, Plaintiff, Defendant and Silverman Acampora LLP, as special counsel to the Official Committee of Unsecured Creditors for borrower matters held the Initial Conference in this Adversary Proceeding. During the Initial Conference the parties discussed the nature of Plaintiff's claims and the relief Plaintiff seeks and the possibility of settlement.

The parties continue to discuss a potential settlement—to that end, the parties have agreed to adjourn the July 10, 2013 status conference and are in discussions concerning an alternative status conference date.

Dated: July 3, 2013
New York, New York

/s/
Gary S. Lee
Norman S. Rosenbaum
Paul Galante
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1290 Avenue of the Americas
New York, New York 10104
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Counsel for the Debtors and Debtors in Possession

Dated: July 4, 2013
Madison, Wisconsin

/s/ Wendy Alison Nora
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	
RESIDENTIAL CAPITAL, LLC, et al.,	Case No. 12-12020 (MG)
Debtors.	Chapter 11
	Jointly Administered
WENDY ALISON NORA,	Adv. Case No. 13-01208 (MG)
Plaintiff,	
v.	
RESIDENTIAL CAPITAL, LLC, *et al.,*	
Defendants.	

CERTIFICATE OF SERVICE OF MOTION TO APPROVE LATE-FILING OF JOINT PROGRESS REPORT

Wendy Alison Nora declares, under penalty of perjury, the she served the Motion to Approve the Acceptance of the Late-Filed Joint Progress Report by CM/ECF on July 4, 2013 and thereby served all interested parties capable of receiving service by CM/ECF as well as counsel for the Debtor-Defendants participating therein with courtesy copies by e-mail.

Dated at Madison, Wisconsin this 4th day of July, 2013.

/s/ Wendy Alison Nora

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