Docket #0150 Date Filed: 11/12/2013

**UNITED STATES BANKRUPTCY COURT**
**SOUTHERN DISTRICT OF NEW YORK**

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| In re | ) | Chapter 11 |
| RESIDENTIAL CAPITAL, LLC, et al., | ) | Case No. 12-12020 (MG) |
| Debtors. | ) | Jointly Administered |

**NOTICE OF MOTION IN LIMINE OF THE NOTES TRUSTEE AND AD HOC COMMITTEE TO EXCLUDE TESTIMONY REGARDING THE REBUTTAL EXPERT REPORT OF GINA GUTZEIT**

PLEASE TAKE NOTICE that UMB Bank, N.A., as successor Notes Trustee (in such capacity, the "Notes Trustee") under that certain Indenture dated as of June 6, 2008 for 9.625% Junior Secured Guaranteed Notes due 2015 of Residential Capital, LLC and the Ad Hoc Committee of Junior Secured Noteholders (the "Ad Hoc Committee," and together with the Notes Trustee, the "JSNs"), by and through their undersigned counsel, will move before the United States Bankruptcy Court for the Southern District of New York, at the United States Bankruptcy Court, One Bowling Green, New York, NY 10004, at a date and time to be set by the Court, for an order granting the JSNs' Motion in Limine to Exclude Testimony Regarding the Rebuttal Expert Report of Gina Gutzeit.

Dated: November 12, 2013
New York, New York

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