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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

CERTIFICATE OF NO OBJECTION REGARDING THE MOTION OF THE RESCAP LIQUIDATING TRUST AND THE RESCAP BORROWER CLAIMS TRUST FOR FINAL DECREE CLOSING CHAPTER 11 CASES

Pursuant to Rule 9013-3 of the Local Bankruptcy Rules for the Southern District of New York (the "**Local Rules**"), the undersigned counsel for the ResCap Liquidating Trust (the "**Liquidating Trust**"), successor in interest to the debtors (the "**Debtors**") in the above-captioned chapter 11 cases, hereby certifies as follows:

1. On July 9, 2026, the ResCap Liquidating Trust filed the *Motion of the Rescap Liquidating Trust and the Rescap Borrower Claims Trust for Final Decree Closing Chapter 11 Cases* [ECF No. 10839] (the "**Motion**").

2. The Motion was served by electronic mail and/or first class mail upon the Special and General Service Lists maintained by Kurtzman Carson Consultants, LLC d/b/a Verita Global on July 9, 2026. See Certificate of Service [ECF No. 10843].

3. The Motion provided for an objection deadline of July 23, 2026. Furthermore, this Court entered a Scheduling Order which also set an objection deadline of July 23, 2026 [ECF No.

10840] (the "**Objection Deadline**").

4. Local Rule 9013-3 provides that a motion may be granted without a hearing if (a) no objections or other responsive pleadings have been filed on or before the applicable objection deadline, and (b) the attorney for the entity that filed the motion complies with such rule.

5. The Objection Deadline has now passed and counsel has reviewed the case docket not less than forty-eight (48) hours after expiration of the Objection Deadline, and is not aware of any objection, responsive pleading, or request for hearing with respect to the Motion that have been filed with the Court on the docket or served on counsel for the ResCap Liquidating Trust.

6. Accordingly, the ResCap Liquidating Trust respectfully requests that the Court enter the proposed order granting the Motion, a copy of which is attached hereto as **Exhibit A**.

Dated: July 29, 2026
New York, New York

HERBERT SMITH FREEHILLS KRAMER (US) LLP

/s/ *Jennifer Sharret*
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EXHIBIT A

Proposed Order

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

FINAL DECREE PURSUANT TO SECTION 350(A) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3022 CLOSING CHAPTER 11 CASE OF RESIDENTIAL CAPITAL, LLC

This Court having considered the motion (the "**Motion**")[1] of the ResCap Liquidating Trust (the "**Liquidating Trust**") and the ResCap Borrower Claims Trust, (the "**Borrower Claims Trust**" and together with the Liquidating Trust, the "**Trusts**"), each a successor in interest to the debtors (the "**Debtors**") in the above-captioned Chapter 11 cases (the "**Chapter 11 Cases**"), for a final decree in the Chapter 11 Case of Residential Capital, LLC ("**ResCap**) as more fully set forth in the Motion; and the Court having subject matter jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. § 1334 and the Amended Standing Order of Referral of Cases to Bankruptcy Court Judges of the District Court for the Southern District of New York, dated January 31, 2012 (Preska, C.J.); and the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, and no other or further notice need be provided; and the relief requested in the Motion being in the best interests of the Debtors and their estates and creditors, and the Court having

[1] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted as provided herein.

2. Pursuant to section 350(a) of the Bankruptcy Code and Rule 3022 of the Bankruptcy Rules, a final decree is hereby entered in the case of ResCap and such case is closed.

3. The Liquidating Trust shall reserve sufficient funds to pay the Office of the United States Trustee the amount of any quarterly fees due pursuant to 28 U.S.C. § 1930 and any applicable interest due pursuant to 31 U.S.C. § 3717, which fees and interest, if any, shall be paid within fifteen (15) days of the entry of this Order of Final Decree (the "**Order**"). Within five (5) days after the entry of the Order, the Liquidating Trust shall provide to the United States Trustee an affidavit indicating cash disbursements for the second quarter of 2026 and for any additional time until the Order has been entered.

4. The services of Verita as claims and noticing agent are terminated effective upon Verita completing the services set forth in this Order. Verita shall prepare a final claims register pursuant to any current guidelines for implementing 28 U.S.C. § 156(c). Verita shall prepare each proof of claim submitted in these cases (whether originally submitted in electronic or paper format) in pdf format for submission to the Clerk's office and shall certify to the Clerk's office that the proofs of claim submitted in electronic format constitutes all of the proofs of claim submitted in these cases. Verita shall not destroy or otherwise dispose of paper copies of claims received in this case unless authorized to do so by the Clerk of the Court.

5. Verita is authorized to continue to maintain financial and tax information and other documents on a website for one year at a reduced cost.

6. Any proof of claim filed against any of the Debtors subsequent to entry of this Final Decree shall be deemed disallowed and expunged without any further action by the Liquidating Trust or the Borrower Claims Trust, and no distributions shall be required to be made under the Plan on account of such claim.

7. The Trusts and their professionals are authorized to dispose of the Obsolete Records immediately upon entry of this Order and the Liquidating Trust is authorized to arrange for the destruction of the Residual Records one year after the final tax returns.

8. Upon the final distribution to Unitholders, the Liquidating Trustee is authorized and directed to cancel the Units and arrange for the retirement of the CUSIP from DTC.

9. The Order (I) Modifying the Court's Order Approving Procedures by Which Third Parties may Request and Obtain Stipulated Relief from the Automatic Stay to Commence or Continue Actions to Foreclose on Senior Liens (ii) Clarifying the Scope of the Plan Injunction Provisions, (III) to the Extent Necessary, Modifying the Automatic Stay and Plan Injunction Provisions to Permit Third Parties to Commence and Complete Actions to Foreclosure on Senior Liens and Non-Monetary Causes of Action Seeking to Clear or Quiet Title and (IV) Modifying the Court's Order Establishing Procedures Enforcing Injunctive Provisions of the Plan and Confirmation Order (the "**Litigation Order**") [Docket No. 10655] remains in full force and effect, provided that third parties are no longer required to effectuate service on the Liquidating Trust, one of its agents or professionals or one of the former Debtors.

10. This Court shall have jurisdiction with respect to issues arising in connection with the Plan or under this Final Decree.

Dated: _____, 2026
New York, New York

UNITED STATES BANKRUPTCY JUDGE

NO OBJECTION:

OFFICE OF THE UNITED STATES TRUSTEE
SOUTHERN DISTRICT OF NEW YORK

By: Paul Schwartzberg
Trial Attorney