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February 20, 2015

VIA E-FILING AND HAND DELIVERY

The Honorable Marcy S. Friedman
Supreme Court of the State of New York
60 Centre Street
New York, New York 10007

***Re: In re application of U.S. Bank National
Association, et al. (Index No. 652382/2014)***

Dear Justice Friedman:

We write on behalf of the Objectors in the above-referenced matter in response to Your Honor's request, at the December 16, 2014 hearing, to furnish "a binder with certain discovery order[s] in some of the cases" discussed at that conference (Tr. at 82:14-18), as well as subsequent guidance from Chambers on January 28, 2015. Objectors hereby submit the following materials reflecting the scope of discovery in the bankruptcy proceeding, *In the Matter of Residential Capital, LLC*, 12-12020-mg (S.D.N.Y.) (the "Residential Capital Proceeding"). Because the Parties are unable to agree on the content of a joint submission of discovery practices in the Residential Capital Proceeding, the enclosed binder is submitted on behalf of the Objectors only. There are seven docket entries summarized below:

Date		Tab
Rule 2004 Discovery		
6/1/2012 (Docket No. 192)	Proposed Order Authorizing the Official Committee of Unsecured Creditors to Issue Subpoenas Pursuant to Fed. R. Bankr. P. 2004; Excerpts of Draft Subpoena to the Debtors. <i>See</i> Highlighted text at Pg. 42 of 48 (subpoena demanding debtor produce "[a]ll documents and communications concerning the RMBS Trust Settlement Agreement....")	1 8 page excerpt
6/5/2012 (Docket No. 217)	Order Authorizing the Official Committee of Unsecured Creditors to Issue Subpoenas Compelling the Production of Documents and Provision of Testimony by the Debtors and Others Pursuant to Fed. R. Bankr. P. 2004 (granting motion of Official Committee of Unsecured Creditors seeking discovery)	2 4 pages

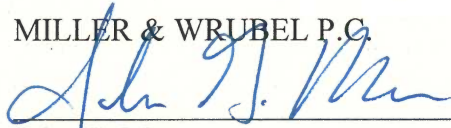
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Date		Tab
2/1/2013 (Docket No. 2825)	Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion Pursuant to Fed. R. Bankr. P. 9019 for Approval of the RMBS Trust Settlement Agreements. <i>See</i> Highlighted text at Pgs. 21-29 of 54 (summarizing discovery produced) and Pgs. 34-35 of 54 (describing loan file review)	3 10 page excerpt
Examiner Discovery		
7/27/2012 (Docket No. 925)	Order Approving Scope of Investigation of Arthur J. Gonzalez, Examiner. <i>See</i> Highlighted text at Pg. 6 of 9 (setting scope of examination to include negotiation and entry of any settlement agreement)	4 8 page excerpt
4/5/2013 (Docket No. 3361)	Fourth Supplement to Work Plan of Arthur J. Gonzalez, Examiner. <i>See</i> Highlighted text at Pg. 2 of 3 (describing the "exceedingly broad" discovery and "enormous undertaking" by Examiner)	5 3 page excerpt
5/13/2013 (Docket No. 3698-10)	Excerpts of Examiner's Report at Pgs. 12-54 of 57 (detailed chronology of settlement negotiation and approval from discovery produced)	6 44 page excerpt
Allocation Discovery		
2/4/2013 (Docket No. 2833)	RMBS Trustees' Statement Regarding Debtors' Motion Pursuant to Fed. R. Bankr. P. 9019 for Approval of RMBS Trust Settlement Agreements. <i>See</i> Highlighted text at Pg. 6 of 8 (Debtor provided Trustees with sampling of loan files to assess revised allocation methodology)	7 8 pages

Respectfully submitted,

On behalf of the Objectors:

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Enclosures

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