

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: : Chapter 11
: :
RC SOONER HOLDINGS, LLC, *et al.*,¹ : Case No. 10-10528 (BLS)
: :
Debtors. : (Jointly Administered)
: :

RC SOONER HOLDINGS, LLC, *et al.* and :
OLD SOUTH APARTMENTS, LLC, :
: :
Plaintiffs, :
: :
v. : Adv. Pro. No. 10-50723 (BLS)
: :
REMYCO., INC.; *et al.* :
: :
Defendants. :
: :

**CERTIFICATION OF COUNSEL REGARDING STIPULATION
EXTENDING TIME TO ANSWER,
MOVE OR OTHERWISE PLEAD TO THE COMPLAINT**

The undersigned counsel hereby certifies as follows:

1. The above-captioned plaintiffs, RC Sooner Holdings, LLC, *et al.* and Old South Apartments, LLC (collectively, the "Plaintiffs"), and defendants RemyCo., Inc., RemyCo., Inc., Home Realty Ventures, Inc., Bradford Creek Properties, LLC, Design and Development Co., Inc., Diamond Pointe, LLC, Bluechip Holdings, LP, Tim L. Remy, Tim J. Remy, Sherry E.

¹ The Debtors and the last four digits of their taxpayer identification numbers are: RC Sooner Holdings, LLC (7904); RC Brixton Square Owner, LLC (8002); RC Cedar Crest Owner, LLC (7914); RC Fulton Plaza Owner, LLC (8011); RC Magnolia Owner, LLC (7998); RC Pomeroy Park Owner, LLC (7939); RC Salida Owner, LLC (7947); RC Savannah South Owner, LLC (7983); RC Southern Hills Owner, LLC (7958); Brixton Square Apartments, LLC (1844); CC Apartments, LLC (1798); Fulton Plaza Apartments, LLC (4344); Magnolia Manor Apartments, LLC (4486); Pomeroy Park Apartments, LLC (1649); Salida Apartments, LLC (1915); Savannah South Apartments, LLC (8586); and Southern Hills Villa Apartments, LLC (1721). The business address for each of the Debtors where notices should be sent is 1515 Broadway, 11th Floor, New York, New York 10036-8901.

Remy, L. Leon Remy, Robin E. Remy, Sherry E. Remy Revocable Trust DTD July 14, 1997, L. Leon Remy Revocable Trust DTD July 14, 1997, and Mona Remy Berke (the "Defendants"), have entered into a Stipulation Extending the Defendants' Time to Answer, Move or Otherwise Plead to the Complaint (the "Stipulation"), a copy of which is attached hereto as Exhibit A. The Stipulation extends the time within which the Defendants must answer, move or otherwise plead to the Debtors' complaint through and including April 15, 2010.

2. The parties to the Stipulation respectfully request that the Court enter the Order, attached hereto as Exhibit B, approving the Stipulation at its earliest convenience.

Dated: April 13, 2010
Wilmington, Delaware

Respectfully submitted,

/s/ Sean J. Bellew

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