

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	
RC SOONER HOLDINGS, LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 10-10528 (BLS)
	:	
Debtors.	:	(Jointly Administered)
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RC SOONER HOLDINGS, LLC, <i>et al.</i> and OLD SOUTH APARTMENTS, LLC,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Adv. Pro. No. 10-50723 (BLS)
	:	
REMYCO., INC., <i>et al.</i>	:	
	:	
Defendants.	:	

**CERTIFICATION PURSUANT TO RULE 7037(a)(1)  
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Pursuant to Rule 7037(a)(1) of the Federal Rules of Bankruptcy Procedure, the undersigned hereby certifies, as set forth in the foregoing Debtors’ Response to Montgomery McCracken Walker & Rhoads LLP’s Motion for Leave to Withdraw as Counsel for the Remy Entities Pursuant to Del. Bankr. L.R. 9010-2(b), and the Plaintiffs’ A) To Compel Discovery Responses; B) For a Finding of Contempt; and C) For Entry of a Scheduling Order (the “Motion”),<sup>2</sup> that counsel for

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<sup>1</sup> 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.

<sup>2</sup> Capitalized terms not defined herein shall have the meaning given in the Motion.

the Plaintiffs have, in good faith, attempted to confer with counsel for the Defendants and made reasonable efforts to obtain the requested discovery responses without the need for court intervention, and that, despite those efforts, the Defendants have not provided the requested discovery responses. Counsel for Plaintiffs' ability to confer on this matter is substantially impeded given counsel for Defendants' pending motion to withdraw.

Date: May 24, 2010

/s/ Sean J. Bellew  
Sean J. Bellew, Esquire