

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

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

**CERTIFICATION OF COUNSEL REGARDING MOTION OF
MONTGOMERY, McCracken, WALKER & RHOADS, LLP
TO WITHDRAW AND RELATED MATTERS**

The undersigned counsel for the defendant Remy Entities in the above-referenced adversary proceeding hereby certifies as follows:

1. Montgomery, McCracken, Walker & Rhoads, LLP has been advised by our clients, the Remy Entities, that they are unable to comply with their contractual obligations regarding our retention and are actively seeking new counsel to represent them in the above matter. As such, the Remy Entities do not intend to object to our Motion to Withdraw as their Counsel in the above-captioned bankruptcy case and related adversary proceedings.

2. While the Remy Entities are attempting to identify new counsel, we respectfully request that the telephonic hearing scheduled for June 1, 2010 be continued to the scheduled June 10, 2010 hearing, at which time the parties are currently scheduled to convene on our Motion to

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.

Withdrawal. This brief adjournment should allow the Remy Entities additional time to secure counsel while minimizing any further delay of the proceedings.

3. We have telephonically advised counsel for the other parties to adversary proceeding no. 10-50723 (BLS), and all other counsel of record by electronic mail, of our intention to make this request. Counsel for the Debtor/Plaintiffs' objects to the requested continuance.

Respectfully submitted,

Dated: May 28, 2010
Wilmington, Delaware

**MONTGOMERY, MCCrackEN, WALKER &
RHOADS, LLP**

BY: /s/ Natalie D. Ramsey
Natalie D. Ramsey, Esquire
(DE Bar No. 5378)
1105 North Market Street,
Suite 1500
Wilmington, DE 19801
Telephone: (302) 504-7800
Facsimile: (302) 504-7820

and

Mark B. Sheppard, Esquire
(admitted *pro hac vice*)
123 South Broad Street
Avenue of the Arts
Philadelphia, PA 19109
Telephone: (215) 772-1500
Facsimile: (215) 772-7620

Counsel for The Remy Entities