

Exhibit 10

Borrower Trust True-Up

Pursuant to Articles I.A.208 and IV.F of the Plan,¹ the amount of the Borrower Trust True-Up shall be set forth in the Plan Supplement.

Following a thorough analysis of the Borrower Claims asserted against the Debtors (the “**True-Up Analysis**”), the Plan Proponents submit that a Borrower Trust True-Up is not required. In accordance with the terms of the Plan Support Agreement, on October 1, 2013, the Plan Proponents made a presentation to the Kessler Class Claimants of the True-Up Analysis. Although the Kessler Class Claimants must undertake a further detailed review of the analysis before determining not to object to the True-Up Analysis in connection with Confirmation, their initial reaction to the True-Up Analysis is consistent with the Plan Proponents’ conclusion that no Borrower Trust True-Up is necessary.

¹ All capitalized terms used but not defined herein shall have the meaning ascribed to them in the *Joint Chapter 11 Plan Proposed by Residential Capital, LLC, et al. and the Official Committee of Unsecured Creditors* [Docket No. 4819, Ex. 1] (as may be amended from time to time, the “**Plan**”).