

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE SEVENTY-SEVENTH OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR THE EXHIBIT ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).

IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE PLAN ADMINISTRATOR'S COUNSEL, ALEKSANDRA MITCHELL, ESQ., AT 212-310-8727 OR ALEKSANDRA.MITCHELL@WEIL.COM

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : Chapter 11
DITECH HOLDING CORPORATION, *et al.*, : Case No. 19-10412 (JLG)
Debtors.¹ : (Jointly Administered)
-----X

**NOTICE OF HEARING ON SEVENTY-SEVENTH OMNIBUS
OBJECTION TO PROOFS OF CLAIM (NO BASIS CLAIMS)**

PLEASE TAKE NOTICE that, on August 27, 2021, the Plan Administrator, on behalf of Ditech Holding Corporation (f/k/a Walter Investment Management Corp.) and its debtor affiliates (excluding Reorganized RMS) (collectively, the “**Wind Down Estates**”) filed the *Seventy-Seventh Omnibus Objection to Proofs of Claim (No Basis Claims)* (the “**Objection**”) with

¹ The Debtors’ Third Amended Plan (as defined below) was confirmed, which created the Wind Down Estates. The Wind Down Estates, along with the last four digits of each of their federal tax identification number, as applicable, are Ditech Holding Corporation (0486); DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837).

the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).²

The Objection requests that the Bankruptcy Court disallow and expunge one or more proofs of claim (the “**Proof(s) of Claim**”) listed on Exhibit A annexed to the Objection on the ground that based on the books and records, the Plan Administrator believes there is no basis for the Proof(s) of Claim.³ **Any claim that the Bankruptcy Court disallows and expunges will be treated as if it had not been filed and you will not be entitled to any distribution on account thereof.**

PLEASE TAKE FURTHER NOTICE that the *Court-Ordered Claim Hearing Procedures* (the “**Claim Hearing Procedures**”) annexed hereto as Exhibit A apply and govern the objection to your Proof(s) of Claim. The Claim Hearing Procedures provide for certain mandatory actions by a Claimant within certain time periods. Therefore, please review the Claim Hearing Procedures carefully. Failure to comply with the Claim Hearing Procedures may result in the disallowance and expungement of a Proof of Claim without further notice.

If you do NOT oppose the disallowance and expungement of your Proof(s) of Claim, then you do NOT need to file a written response to the Objection and you do NOT need to appear at the hearing.

If you DO oppose the disallowance and expungement of your Proof(s) of Claim, then you MUST file with the Court and serve on the parties listed below a written response to the

² Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the *Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (the “**Third Amended Plan**”) (ECF No. 1326) or the *Order Approving (I) Claims Objection Procedures and (II) Claim Hearing Procedures* (the “**Order**”) (ECF No. 1632), as applicable.

³ Claimants will be served an individualized notice regarding their Proof(s) of Claim that are being objected to in the Objection.

Objection that is received on or before **4:00 p.m. (prevailing Eastern Time) on September 17, 2021** (the “**Response Deadline**”).

Your response, if any, must contain at a minimum the following: (i) a caption setting forth the name of the Bankruptcy Court, Ditech Holding Corporation, *et al.*, the case number and the title of the Objection to which the response is directed; (ii) the name of the Claimant and description of the basis for the amount of the Claim; (iii) a concise statement setting forth the reasons why the Claim should not be disallowed, expunged, reduced, or reclassified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which you will rely in opposing the Objection; (iv) all documentation or other evidence of the Claim, to the extent not included with the Proof of Claim previously filed with the Bankruptcy Court, upon which you will rely in opposing the Objection; (v) the address(es) to which the Wind Down Estates must return any reply to your response, if different from that presented in the Proof of Claim; and (vi) the name, address, and telephone number of the person (which may be you or your legal representative) possessing ultimate authority to reconcile, settle, or otherwise resolve the Claim on your behalf.

The Bankruptcy Court will consider a response only if the response is timely filed, served, and received. A response will be deemed timely filed, served, and received only if the original response is actually received on or before the Response Deadline by (i) the chambers of the Honorable James L. Garrity, Jr., United States Bankruptcy Court, One Bowling Green, New York, New York, 10004 (casefiling@nysb.uscourts.gov); and (ii) Weil, Gotshal, & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Claims Team (ClaimsPhoenix@weil.com) and Aleksandra Mitchell, Esq. (aleksandra.mitchell@weil.com)), attorneys for the Plan Administrator.

Except as otherwise permitted under the Claim Hearing Procedures, a hearing to consider the Objection will be held on **September 30, 2021 at 11:00 a.m. (prevailing Eastern Time)** in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 601, New York, New York, 10004. If you file a written response to the Objection, you should plan to appear telephonically at the hearing. The Plan Administrator, however, reserves the right to continue the hearing on the Objection with respect to your Claim(s). If the Plan Administrator does continue the hearing with respect to your Claim(s), then the hearing will be held at a later date. If the Plan Administrator does not continue the hearing with respect to your Claim(s), then a hearing on the Objection will be conducted on the above date.

The Bankruptcy Court has entered General Order M-543 in order to protect public health, and in recognition of the national emergency that was declared by the President of the United States on March 13, 2020, the Bankruptcy Court has ordered all hearings to be conducted telephonically. If you wish to appear at, or attend, the hearing, please refer to the Bankruptcy Judge's guidelines for telephonic appearances at www.nysb.uscourts.gov and make arrangements with Court Solutions LLC at 646-760-4600 or <https://www.courtsolutions.com>.

If you wish to view the complete Objection, you can do so for free at <https://dm.epiq11.com/case/ditech>, or by calling Epiq Corporate Restructuring, LLP at 866-486-4809 (Domestic) or 503-597-7698 (International) to request a copy by mail.

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**CLAIMANTS SHOULD NOT CONTACT THE CLERK OF THE BANKRUPTCY
COURT TO DISCUSS THE MERITS OF THEIR CLAIMS.**

Dated: August 27, 2021
New York, New York

/s/ Sunny Singh
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Ray C. Schrock, P.C.
Richard W. Slack
Sunny Singh

Attorneys for Plan Administrator

Exhibit A

Claim Hearing Procedures

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:
In re	:
	:
DITECH HOLDING CORPORATION, et al.,	:
	:
Debtors.¹	:
	:
-----X	

Chapter 11
Case No. 19-10412 (JLG)
(Jointly Administered)

COURT-ORDERED CLAIM HEARING PROCEDURES

The claim hearing procedures (the “**Claim Hearing Procedures**”) described herein have been ordered by the United States Bankruptcy Court for the Southern District of New York (the “**Court**”) to apply to the chapter 11 cases of the Ditech Holding Corporation (f/k/a Walter Investment Management Corp.) and its debtor affiliates (excluding Reorganized RMS) (collectively, the “**Wind Down Estates**”).²

Claim Hearing Procedures

1. Pursuant to the *Order Implementing Certain Notice and Case Management Procedures*, dated March 19, 2019 (ECF No. 211) (the “**Case Management Order**”), the Court established periodic omnibus hearings (the “**Omnibus Hearings**”) in these cases. The Plan Administrator, on behalf of the Wind Down Estates, shall schedule the return date for claims objections, omnibus or otherwise, for hearing at Omnibus Hearings or other hearings the Plan Administrator may schedule with the Court.
2. The Court may enter an order at the scheduled hearing sustaining an objection to proofs of claim (each, a “**Proof of Claim**”) with respect to which no response (a “**Response**”) ³ is properly filed and served.

¹ The Debtors’ Third Amended Plan (as defined below) was confirmed, which created the Wind Down Estates. The Wind Down Estates, along with the last four digits of each of their federal tax identification number, as applicable, are Ditech Holding Corporation (0486); DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837).

² Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the *Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (the “**Third Amended Plan**”) (ECF No. 1326) or the *Order Approving (I) Claims Objection Procedures and (II) Claim Hearing Procedures* (the “**Order**”) (ECF No. 1632), as applicable.

³ Any information submitted in connection with a Proof of Claim shall be part of the record with respect to the relevant Claim, and any such information already submitted need not be resubmitted in connection with the Claim Hearing Procedures.

3. The hearing to consider an objection to Proofs of Claim as to which a Response is properly filed and served (each, a “**Contested Claim**”) shall be set for a contested hearing (each, a “**Claim Hearing**”) to be scheduled by the Plan Administrator, in its sole discretion, as set forth herein. The Plan Administrator may request that the Court schedule Claim Hearings on the date and/or time of the Omnibus Hearings or at another date and time.
4. The Plan Administrator shall schedule a Claim Hearing for a Contested Claim as follows:
 - (a) For a non-evidentiary hearing to address whether the Contested Claim has failed to state a claim against the Debtors which can be allowed and should be dismissed pursuant to Bankruptcy Rule 7012 (a “**Sufficiency Hearing**”), unless the Plan Administrator serves the Claimant with a Notice of Merits Hearing (as defined herein), the Sufficiency Hearing shall go forward at the return date set in accordance with paragraph 1 of these Claim Hearing Procedures. The legal standard of review that will be applied by the Court at a Sufficiency Hearing will be equivalent to the standard applied by the Court upon a motion to dismiss for failure to state a claim upon which relief can be granted.
 - (b) For an evidentiary hearing on the merits of a Contested Claim (a “**Merits Hearing**”), the Plan Administrator may, in its sole discretion, serve upon the relevant Claimant, by email or overnight delivery and file with the Court, a notice substantially in the form attached to the Order as Exhibit 2 (a “**Notice of Merits Hearing**”) at least thirty (30) calendar days prior to the date of such Merits Hearing. The rules and procedures applicable to such Merits Hearing will be set forth in any scheduling order issued by the Court in connection therewith.
5. Discovery with respect to a Contested Claim will not be permitted until either (i) the Court has held a Sufficiency Hearing and determined that the Contested Claim states a claim that could be allowed and should not be dismissed pursuant to Bankruptcy Rule 7012 or (ii) the Plan Administrator has served the relevant Claimant a Notice of Merits Hearing with respect to the Contested Claim.
6. The Plan Administrator may file and serve a reply (a “**Reply**”) to a Response no later than **4:00 p.m. (Prevailing Eastern Time) on the day that is at least five (5) business days prior to the date of the applicable hearing.**
7. The Plan Administrator, in its sole discretion, is authorized to further adjourn a hearing scheduled in accordance herewith at any time by providing notice to the Court and the Claimant.
8. The Court will consider appropriate sanctions, including allowance or disallowance of the Contested Claim, if either party does not follow the Claim Hearing Procedures.

BY ORDER OF THE COURT

Hearing Date and Time: September 30, 2021 at 11:00 a.m. (Prevailing Eastern Time)
Response Deadline: September 17, 2021 at 4:00 p.m. (Prevailing Eastern Time)

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Ray C. Schrock, P.C.
Sunny Singh

Attorneys for Plan Administrator

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re	:	Chapter 11
	:	
DITECH HOLDING CORPORATION, <i>et al.</i> ,	:	Case No. 19-10412 (JLG)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
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**SEVENTY-SEVENTH OMNIBUS
OBJECTION TO PROOFS OF CLAIM (NO BASIS CLAIMS)**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED
PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS
OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON
THE EXHIBIT ATTACHED TO THIS OBJECTION.**

**IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE
PLAN ADMINISTRATOR'S COUNSEL, ALEKSANDRA MITCHELL, ESQ., AT
212-310-8727 OR ALEKSANDRA.MITCHELL@WEIL.COM**

¹ The Debtors confirmed the *Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (ECF No. 1326) (the "**Third Amended Plan**"), which created the Wind Down Estates. Wind Down Estates, along with the last four digits of their federal tax identification number, as applicable, are Ditech Holding Corporation (0486); DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837).

TO THE HONORABLE JAMES L. GARRITY, JR.,
UNITED STATES BANKRUPTCY JUDGE:

The Plan Administrator,² on behalf of Ditech Holding Corporation (f/k/a Walter Investment Management Corp.) and its debtor affiliates (excluding Reorganized RMS) (collectively, the “**Wind Down Estates**”), respectfully represents as follows in support of this omnibus objection (the “**Objection**”):

Background

1. On February 11, 2019 (the “**Commencement Date**”), Ditech Holding Corporation (f/k/a Walter Investment Management Corp.) and certain of its affiliates (collectively, the “**Debtors**”) each commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

2. The chapter 11 cases are being jointly administered for procedural purposes only pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”).

3. On September 26, 2019, the Court entered the Confirmation Order. Pursuant to the Third Amended Plan, the Debtors sold their forward and reverse business to the Forward Buyer and Reverse Buyer, respectively.

4. The Effective Date of the Third Amended Plan occurred on September 30, 2019. *See Notice of (I) Entry of Order Confirming Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors, (II) Occurrence of Effective Date, and (III) Final Deadline for Filing Administrative Expense Claims* (ECF No. 1449).

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to such terms in the Third Amended Plan or the *Order Confirming Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (ECF No. 1404) (the “**Confirmation Order**”), as applicable.

Claims Process

5. On March 27, 2019, the Debtors filed their schedules of assets and liabilities and statements of financial affairs (collectively, the “**Schedules**”) (ECF Nos. 289-313). On May 7, 2019, the Debtors filed certain amended Schedules (ECF Nos. 511-512).

6. On February 22, 2019, the Court entered the *Order Establishing Deadline for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof* (ECF No. 90) (the “**Bar Date Order**”). Pursuant to the Bar Date Order, the Court set April 1, 2019 at 5:00 p.m. (Prevailing Eastern Time) as the deadline for each person or entity, not including governmental units (as defined in section 101(27) of the Bankruptcy Code) to file a proof of claim in the Debtors’ chapter 11 cases (the “**General Bar Date**”). On March 27, 2019, the Court extended the General Bar Date to April 25, 2019 at 5:00 p.m. (Prevailing Eastern Time) (ECF No. 272) (the “**Extended General Bar Date**”). On May 2, 2019, the Court extended the Extended General Bar Date solely for consumer borrowers to June 3, 2019 at 5:00 p.m. (Prevailing Eastern Time) (ECF No. 496).

7. Pursuant to the Confirmation Order, the Court set the deadline for each person or entity asserting Administrative Expense Claims to file proofs of claim in the chapter 11 cases to thirty-five (35) days from the date of service of the notice of entry of the Confirmation Order—November 11, 2019.

8. Under the Third Amended Plan, (i) the Plan Administrator, on behalf of each of the Wind Down Estates, has exclusive authority to object to all Administrative Expense Claims, Priority Tax Claims, Priority Non-Tax Claims, and Other Secured Claims; (ii) the GUC Recovery Trustee, on behalf of the GUC Recovery Trust, has the exclusive authority to object to all General Unsecured Claims; and (iii) the Consumer Representative has the exclusive authority to object to all Consumer Creditor Claims.

9. The claims register, prepared and maintained by Epiq Corporate Restructuring, LLC (“**Epiq**”), shows that approximately 7,800 proofs of claim (the “**Proofs of Claim**”) were filed in the chapter 11 cases. The Plan Administrator is actively reviewing and reconciling the Proofs of Claim, and the ongoing claims reconciliation process involves the collective effort of the Wind Down Estates’ employees, the GUC Recovery Trustee, and the Consumer Representative.

10. On November 19, 2019, the Bankruptcy Court entered the *Order Approving (I) Claim Objection Procedures and (II) Claim Hearing Procedures* (ECF No. 1632) (the “**Claims Procedures Order**”).

Jurisdiction

11. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

12. The Plan Administrator files this Objection pursuant to the Claims Procedures Order, seeking entry of an order disallowing and expunging the Claims listed on **Exhibit A** annexed hereto (the “**No Basis Claims**”).

13. The Plan Administrator, with the assistance of its professionals, has examined each No Basis Claim, the documentation provided with respect to each No Basis Claim, if any, and the Debtors’ respective books and records, and has determined in each case that (i) there is no evidence to support the validity of the No Basis Claims, in the amounts and priority asserted and/or (ii) such Claims are deemed to have no merit.

14. The Plan Administrator, therefore, requests that the No Basis Claims be disallowed and expunged in their entirety. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit B** (the “**Proposed Order**”).

The No Basis Claims Should Be Disallowed and Expunged

15. A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). Upon an objection, the claimant has the burden to demonstrate the validity of the claim. *See Residential Capital, LLC*, 2016 WL 796860, at *9 (S.D.N.Y. 2016); *In re Arcapita Bank B.S.C.(c)*, 2013 WL 6141616, at *1 (Bankr. S.D.N.Y. 2013), *aff’d sub nom. In re Arcapita Bank B.S.C.(c)*, 508 B.R. 814 (S.D.N.Y. 2014); *In re Motors Liquidation Co.*, 2012 WL 1886755, at *3 (S.D.N.Y. 2012); *In re Oneida, Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009), *aff’d*, No. 09 Civ. 2229 (DC), 2010 WL 234827, at *5 (S.D.N.Y. Jan. 22, 2010).

16. Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law.” 11 U.S.C. § 502(b)(1). Further, Bankruptcy Rule 3007(d) permits a debtor to file objections to more than one claim on the basis that, among other things, such claims “have been amended by subsequently filed proofs of claim.” Fed. R. Bankr. P. 3007(d)(3).

17. The Plan Administrator has reviewed the No Basis Claims, all documents furnished by the claimants with respect to the No Basis Claims, if any, and the Debtors’ books and records, and has determined that no amounts are due and owing on account of the No Basis Claims in the asserted amount and asserted priority. As certain of the No Basis Claims (or portions thereof) asserted general unsecured status, the No Basis Claims included in the Objection were provided to the GUC Recovery Trustee for review. The GUC Recovery Trustee agrees with the Plan Administrator’s analysis and relief requested.

18. To ensure that the claims register is accurate, the Plan Administrator seeks entry of the Proposed Order disallowing and expunging in their entirety the No Basis Claims from the claims register.

Separate Contested Matters

19. To the extent a Response is filed regarding any claim listed in this Objection and the Plan Administrator is unable to resolve the Response, the objection by the Plan Administrator to such claim shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding an objection asserted in this Objection shall be deemed a separate order with respect to each claim subject thereto.

Reservation of Rights

20. The Plan Administrator hereby reserves the right to amend, modify, or supplement this Objection including, without limitation, the filing of objections to further amended or newly-filed claims. Separate notice and a hearing will be provided in connection with any such additional objections.

Notice

21. Notice of this Objection will be provided in accordance with the procedures set forth in Claims Procedures Order, and individualized notices will be provided to the claimants. The Plan Administrator respectfully submits that no further notice is required.

22. No previous request for the relief sought herein has been made by the Plan Administrator to this or any other Court.

WHEREFORE the Plan Administrator, on behalf of the Wind Down Estates, respectfully requests entry of the Proposed Order granting the relief requested herein and such other and further relief as is just.

Dated: August 27, 2021
New York, New York

/s/ Sunny Singh
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Ray C. Schrock, P.C.
Richard W. Slack
Sunny Singh

Attorneys for Plan Administrator

Exhibit A

No Basis Claims

Exhibit

Ditech Holding Corporation, et al.

Case No 19-10412 Jointly Administered

No Basis Claims

No.	Name of Claimant	Date Claim Filed	Claim Number	Asserted / Scheduled Claim Amount					Reason for Disallowance
				Secured	Admin	Priority	Unsecured	Total	
1.	STATE OF FLORIDA - DEPARTMENT OF REVENUE C/O FREDERICK F RUDZIK, ESQ PO BOX 6668 TALLAHASSEE, FL 32314-6668	3/22/2019	402	\$ -	\$ -	\$ 11,638.99	\$ 3,813.60	\$ 15,452.59	Claim determined to have no merit based on Company review. Claim was satisfied.
2.	UMH PROPERTIES INC C/O LEIGH A HOFFMAN, ESQ 8 SOUTHWOODS BLVD, STE 207 ALBANY, NY 12211	4/25/2019	21272	\$ 6,226.58	\$ 1,024.61	\$ -	\$ 1,333.39	\$ 8,584.58	Claim determined to have no merit based on Company review. Lien was released to claimant.
3.	UMH PROPERTIES INC C/O LEIGH A HOFFMAN, ESQ 8 SOUTHWOODS BLVD, STE 207 ALBANY, NY 12211	4/25/2019	21309	\$ -	\$ 1,710.29	\$ -	\$ 1,819.71	\$ 3,530.00	Claim determined to have no merit based on Company review. Lien was released to claimant.
4.	UMH PROPERTIES INC C/O LEIGH A HOFFMAN, ESQ 8 SOUTHWOODS BLVD, STE 207 ALBANY, NY 12211	4/25/2019	21314	\$ -	\$ 1,056.79	\$ -	\$ 3,637.50	\$ 4,694.29	Claim determined to have no merit based on Company review. Lien was released to claimant.
5.	UMH PROPERTIES INC C/O LEIGH A HOFFMAN, ESQ 8 SOUTHWOODS BLVD, STE 207 ALBANY, NY 12211	4/25/2019	21324	\$ -	\$ 1,145.21	\$ -	\$ 2,132.21	\$ 3,277.42	Claim determined to have no merit based on Company review. Ditech was not the owner of the property.

Exhibit B

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re	:	Chapter 11
	:	
DITECH HOLDING CORPORATION, <i>et al.</i> ,	:	Case No. 19-10412 (JLG)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	
-----	X	

**ORDER GRANTING SEVENTY-SEVENTH OMNIBUS
OBJECTION TO PROOFS OF CLAIM (NO BASIS CLAIMS)**

Upon the *Seventy-Seventh Omnibus Objection to Proofs of Claim (No Basis Claims)* filed on August 27, 2021 (the “**Objection**”),² for an order (i) disallowing and expunging the No Basis Claims, and (ii) granting related relief, all as more fully set forth in the Objection; and the Bankruptcy Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. §§ 157(a)-(b) and 1334 and the *Amended Standing Order of Reference M-431*, dated January 31, 2012 (Preska, C.J.); and consideration of the Objection and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Bankruptcy Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the relief requested in the Objection having been provided, and it appearing that no other or further notice need be provided in accordance with the Claims Procedures Order; and such notice having been adequate and appropriate under the circumstances; and the Bankruptcy

¹ The Debtors confirmed the *Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (ECF No. 1326) (the “**Third Amended Plan**”), which created the Wind Down Estates. Wind Down Estates, along with the last four digits of their federal tax identification number, as applicable, are Ditech Holding Corporation (0486); DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837).

² Capitalized terms not otherwise herein defined shall have the meanings ascribed to such terms in the Objection.

Court having held a hearing to consider the relief requested in the Objection on September 30, 2021 (the “**Hearing**”); and upon the record of the Hearing, and upon all of the proceedings had before the Bankruptcy Court; and the Bankruptcy Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and is in the best interests of the Wind Down Estates, their creditors, and all parties in interest; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT

1. The Objection is granted to the extent set forth herein.
2. Each No Basis Claim listed on **Exhibit 1** annexed to this Order is disallowed and expunged in its entirety, and each such No Basis Claim shall be deleted from the claims register.
3. Each No Basis Claim and the objections by the Plan Administrator to such Claims, as set forth on **Exhibit 1** hereto, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each such No Basis Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.
4. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any claim referenced or identified in the Objection that is not listed on **Exhibit 1**.

5. The Plan Administrator, Epiq, and the Clerk of this Bankruptcy Court are authorized to take all actions necessary or appropriate to give effect to this Order.

6. The Bankruptcy Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

7. The terms and conditions of this Order are effective immediately upon entry.

Dated: _____, 2021
New York, New York

THE HONORABLE JAMES L. GARRITY, JR.
UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

No Basis Claims