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**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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**PLAN ADMINISTRATOR-APPELLEE’S COUNTER-DESIGNATION OF
ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Appellee, the Plan Administrator for the Wind Down Estates of Ditech Holding Corporation (f/k/a Walter Investment Management Corp.) and its debtor affiliates (excluding Reorganized RMS) (collectively, the “**Wind Down Estates**”) hereby designates, pursuant to Rule 8009(a)(2) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the following additional items to be included in the record on appeal.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s 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); Mortgage Asset Systems, LLC (8148); REO Management Solutions, LLC (7787); Reverse Mortgage Solutions, Inc. (2274); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837). The Wind Down Estates’ principal offices are located at 2600 South Shore Blvd., Suite 300, League City, TX 77573.

Although the Plan Administrator disagrees with the statement of issues identified by Desmond-Roy Demontegnac and Sophia-Elaine Demontegnac (the “**Appellants**”), the Plan Administrator has not re-stated the issues because Rule 8009 of the Bankruptcy Rules does not provide for the filing of Appellee’s statement of the issues absent a cross-appeal. The Plan Administrator, therefore, reserves its right to re-state the issues on appeal in its brief.

COUNTER-DESIGNATION OF RECORD

The Plan Administrator does not re-designate any items that it may rely upon that have already been designated by the Appellants in their designation of record (ECF No. 3) but, rather, will rely on the Appellants’ designations. Appellants specifically enumerated some exhibits and attachments, but not others. *See, e.g., id.* at Designation No. 2. For the avoidance of doubt, for the filings designated by either the Plan Administrator or the Appellants, the Plan Administrator treats the designations as including *all* exhibits and attachments to such filings, whether listed or not by either the Plan Administrator or the Appellants. Moreover, while the Plan Administrator does not, at this time, object to any items designated by the Appellants, the Plan Administrator does not concede the relevance of any such items.

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Designation Number	ECF Number	Date of Filing	Description
1.	1326	09/22/2019	Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors
2.	1404	09/26/2019	Order signed on 9/26/2019 Confirming Third Amended Chapter 11 Plan
3.	1743	01/17/2020	Eleventh Omnibus Objection to Proofs of Claim (No Basis Consumer Creditor Claims)

Dated: September 23, 2021
New York, New York

/s/ Richard W. Slack
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