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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, 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**”), 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 Wind Down Estates disagree with the statement of issues identified by Finance of America Reverse LLC (the “**Appellant**”), the Wind Down Estates have not re-stated the issues because Rule 8009 of the Bankruptcy Rules does not provide for the filing of an Appellee’s statement of the issues absent a cross-appeal. The Wind Down Estates, therefore, reserve their right to re-state the issues on appeal in their brief. The Wind Down Estates also reserve the right to supplement, amend or modify its record designations as appropriate.

COUNTER-DESIGNATION OF RECORD

The Wind Down Estates do not re-designate any items that it may rely upon that have already been designated by the Appellant in its designation of record (ECF No. 3769) but, rather, will rely on the Appellant’s designations. For the avoidance of doubt, for the filings designated by either the Wind Down Estates or the Appellant, the Wind Down Estates consider the designations to include ***all*** exhibits and attachments to such filings, whether separately listed or not by either the Wind Down Estates or the Appellant. Moreover, the Wind Down Estates do not concede the relevance of any items designated by the Appellant.

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Designation Number	ECF Number	Date of Filing	Description
1.	2	02/11/2019	Declaration of Gerald A. Lombardo Pursuant to Rule 1007-2 of Local Bankruptcy Rules for Southern District of New York
2.	90	02/22/2019	Order Establishing Deadline for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof
3.	496	05/02/2019	Order Further Extending General Bar Date for Filing Proofs of Claim for Consumer Borrowers Nunc Pro Tunc
4.	543	05/10/2019	Amended Disclosure Statement for Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors
5.	2940	11/02/2020	Transcript of Hearing Held on 10-29-2020
6.	3034	11/11/2020	Memorandum Decision and Order Granting Plan Administrator's Sixth Omnibus Motion to Enforce the Plan Injunction and Confirmation Order as It Relates to Gautam and Panthobi Sharma

Dated: December 1, 2021
New York, New York

/s/ Richard W. Slack
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