

**Presentment Date and Time: January 6, 2022 at 10:00 a.m. (prevailing Eastern Time)**  
**Objection Deadline: January 4, 2022 at 4:00 p.m. (prevailing Eastern Time)**  
**Hearing Date and Time (Only if Objection Filed): To Be Determined**

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

PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, NY 10017  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777  
Robert J. Feinstein  
Bradford J. Sandler  
Shirley S. Cho

*Attorneys for Plan Administrator  
and Wind Down Estates*

*Attorneys for GUC Recovery Trust*

JENNER & BLOCK LLP  
919 Third Avenue  
New York, New York 10022  
(212) 891-1600  
Richard Levin

*Attorneys for Consumer Representative*

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

**NOTICE OF SIXTH JOINT MOTION OF  
PLAN ADMINISTRATOR, GUC RECOVERY TRUSTEE,  
AND CONSUMER REPRESENTATIVE FOR ENTRY OF ORDER EXTENDING  
DEADLINE TO OBJECT TO CLAIMS UNDER THE THIRD AMENDED PLAN**

<sup>1</sup> On September 26, 2019, the Court confirmed the *Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (ECF No. 1404) (the “**Third Amended Plan**”), which created the Wind Down Estates. The 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). The Wind Down Estates’ principal offices are located at 2600 South Shore Blvd., Suite 300, League City, TX 77573.

**PLEASE TAKE NOTICE** that the Plan Administrator,<sup>2</sup> 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**”); META Advisors LLC, in its capacity as trustee under the GUC Recovery Trust Agreement (the “**GUC Recovery Trustee**”) acting on behalf of the Ditech Holding Corporation GUC Recovery Trust (the “**GUC Recovery Trust**”); and Tara Twomey, in her capacity as the consumer representative appointed under the Consumer Representative Agreement (the “**Consumer Representative**”)<sup>3</sup> will present the annexed joint motion (the “**Motion**”) for entry of an order pursuant section 105(a) of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 9006(b)(1) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) extending the deadlines established under the Third Amended Plan for objecting to claims (the “**Claim Objection Deadline**”), substantially in the form attached to the Motion as **Exhibit A** (the “**Proposed Order**”), for signature to the Honorable James L. Garrity, Jr., United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 601, One Bowling Green, New York, New York 10004 (the “**Bankruptcy Court**”) on **January 6, 2022 at 10:00 a.m. (prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections (the “**Objections**”) to the Motion shall be in writing, shall conform to the Bankruptcy Rules and the Local Rules, shall be filed with the Bankruptcy Court (i) by attorneys practicing in the Bankruptcy Court, including attorneys admitted *pro hac vice*, electronically in accordance with

---

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings 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.

<sup>3</sup> The Consumer Representative is also referred to as the Consumer Claims Trustee pursuant to that certain *Consumer Creditor Recovery Trust Agreement and Declaration of Trust*, dated September 30, 2019.

General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)), and (ii) by all other parties in interest, on a CD-ROM, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with the *Order Implementing Certain Notice and Case Management Procedures* (ECF No. 211) (the “**Case Management Order**”), so as to be filed and received no later than **January 4, 2022 at 4:00 p.m. (prevailing Eastern Time)** (the “**Objection Deadline**”).

**PLEASE TAKE FURTHER NOTICE** that, if a written Objection is timely filed, a hearing will be held to consider the Motion on a date and time to be set by the Court.

*[Remainder of Page Intentionally Left Blank]*

**PLEASE TAKE FURTHER NOTICE** that, if an Objection to the Motion is not received by the Objection Deadline, the Court may enter the Proposed Order granting the relief sought without further notice.

Dated: December 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  
and Wind Down Estates*

/s/ Beth Levine  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, New York 10017  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777  
Robert J. Feinstein  
Bradford J. Sandler  
Shirley S. Cho  
Beth Levine

*Attorneys for GUC Recovery Trust*

/s/ Richard Levin  
JENNER & BLOCK LLP  
919 Third Avenue  
New York, New York 10022  
(212) 891-1600  
Richard Levin

*Attorneys for Consumer Representative*

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

PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, NY 10017  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777  
Robert J. Feinstein  
Bradford J. Sandler  
Shirley S. Cho

*Attorneys for Plan Administrator  
and Wind Down Estates*

*Attorneys for GUC Recovery Trust*

JENNER & BLOCK LLP  
919 Third Avenue  
New York, New York 10022  
(212) 891-1600  
Richard Levin

*Attorneys for Consumer Representative*

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

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

**SIXTH JOINT MOTION OF PLAN  
ADMINISTRATOR, GUC RECOVERY TRUSTEE, AND  
CONSUMER REPRESENTATIVE FOR ENTRY OF ORDER EXTENDING  
THE DEADLINE TO OBJECT TO CLAIMS UNDER THE THIRD AMENDED PLAN**

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

<sup>1</sup> On September 26, 2019, the Court confirmed the *Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (ECF No. 1404) (the “**Third Amended Plan**”), which created the Wind Down Estates. The 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). The Wind Down Estates’ principal offices are located at 2600 South Shore Blvd., Suite 300, League City, TX 77573.

The Plan Administrator,<sup>2</sup> 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**”); META Advisors LLC, in its capacity as trustee under the GUC Recovery Trust Agreement (the “**GUC Recovery Trustee**”) acting on behalf of the Ditech Holding Corporation GUC Recovery Trust (the “**GUC Recovery Trust**”); and Tara Twomey, in her capacity as the consumer representative under the Consumer Representative Agreement (the “**Consumer Representative**”),<sup>3</sup> respectfully represent as follows in support of this motion (the “**Motion**”):

### **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**”). The Debtors operated their business and maintained their assets as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these chapter 11 cases.

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**”).

---

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings 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.

<sup>3</sup> The Consumer Representative is also referred to as the Consumer Claims Trustee pursuant to that certain *Consumer Creditor Recovery Trust Agreement and Declaration of Trust*, dated September 30, 2019.

3. On September 26, 2019, the Court entered the Confirmation Order confirming the Third Amended Plan. The effective date of the Third Amended Plan occurred on September 30, 2019 (the “**Effective Date**”).<sup>4</sup>

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

#### **Jurisdiction**

5. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

#### **Relief Requested**

6. Pursuant to section 105(a) of the Bankruptcy Code and Rule 9006(b)(1) of the Bankruptcy Rules, the Plan Administrator, GUC Recovery Trustee, and Consumer Representative respectfully request a further extension of the deadline to object to proofs of claim filed in these chapter 11 cases by one-hundred eighty (180) days, **through and including July 20, 2022**, without prejudice to the ability of the aforementioned parties to request a further extension.

---

<sup>4</sup> 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).

**Overview of Claims Reconciliation Process**

7. 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).

8. 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**”) which, among other things, established (i) April 1, 2019 at 5:00 p.m. (prevailing Eastern Time) as the deadline for persons or entities other than Governmental Units (as defined in section 101(27) of the Bankruptcy Code) to file proofs of claim (the “**General Bar Date**”) and (ii) August 12, 2019 at 5:00 p.m. (prevailing Eastern Time) as the deadline for Governmental Units to file proofs of claim (the “**Governmental 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 with respect to the Debtors’ consumer borrowers to June 3, 2019 at 5:00 p.m. (prevailing Eastern Time) (ECF No. 496).

9. In accordance with the Bar Date Order, Epiq Corporate Restructuring, LLC (“**Epiq**”), the Debtors’ court-appointed claims and noticing agent, mailed notice of the General Bar Date and proof of claim forms to, among others, all of the Debtors’ creditors and other known parties in interest as of the Commencement Date (Docket Nos. 142, 392, 586, 805, 1481, 1541). Notice of the General Bar Date was also published in the national editions of *The New York Times* and *USA Today*.

10. Pursuant to Section 7.1 of the Third Amended Plan:

- i. the Plan Administrator, on behalf 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.

11. As of the date of the filing of this Motion, the claims register, which is prepared and maintained by Epiq, shows that 7,928 proofs of claim (collectively, the “**Proofs of Claim**”) have been filed against the Debtors in these chapter 11 cases asserting an aggregate amount of approximately \$8.1 billion. The ongoing claims reconciliation process involves the collective and coordinated efforts of the Wind Down Estates’ employees, the Plan Administrator, GUC Recovery Trustee, and Consumer Representative, each with the assistance of their financial and legal advisors (collectively, the “**Reviewing Parties**”).

12. The Third Amended Plan required the Reviewing Parties to file objections to Proofs of Claim within one-hundred eighty (180) days following the Effective Date (the “**Claim Objection Deadline**”) or such later date as ordered by the Court for cause. *See* Third Amended Plan § 7.1.

13. The Court had previously entered five orders granting prior joint motions of the Plan Administrator, on behalf of the Wind Down Estates, the GUC Recovery Trustee, and the Consumer Representative for extensions of the Claims Objection Deadline, which currently is set to expire on January 21, 2022. *See* ECF Nos. 1925, 2829, 3190, 3440, and 3682.

14. To date, the Plan Administrator has filed seventy-seven (77) omnibus claim objections, some of which represent joint claim objections with the Consumer Representative and/or GUC Recovery Trustee. Additionally, to date, the Consumer Representative has filed fifty (50) omnibus claim objections, and the GUC Recovery Trustee has filed eighteen (18)

omnibus claim objections. The Court has entered orders with respect to one-hundred ninety-four (194) such omnibus objections to date.

15. To date, seven-thousand and eighty-two (7,082) Proofs of Claim have been reconciled and resolved (i.e., either allowed in full, reduced and allowed, reclassified, withdrawn, or expunged) or are currently pending an objection. However, the Reviewing Parties require additional time to effectively reconcile, resolve, or file objections to the remaining eight-hundred and sixty-three (863) Proofs of Claim in light of the substantial volume of claims filed in these chapter 11 cases and the complexities associated with reconciling Consumer Creditor Claims in particular.

16. As such, the Reviewing Parties require an additional extension of the Claim Objection Deadline by one-hundred eighty (180) days, through and including July 20, 2022, without prejudice to the ability of the Reviewing Parties to request a further extension.

**Cause Exists to Extend the Claim Objection Deadline**

17. The Third Amended Plan, Bankruptcy Code, and Bankruptcy Rules provide ample authority on which the Court may grant the relief requested herein. Additionally, the facts and circumstances of these chapter 11 cases demonstrate that cause exists to extend the Claim Objection Deadline.

18. First, pursuant to the Third Amended Plan, “[a]ny objections to proofs of Claim shall be served and filed on or before the later of (a) one-hundred eighty (180) days after the Effective Date, and (b) *on such later date as ordered by the Bankruptcy Court for cause*[.]” Third Amended Plan § 7.1 (emphasis added).

19. Second, section 105(a) of the Bankruptcy Code empowers the Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105. *See Adelphia Bus. Solutions, Inc. v. Abnos*, 482 F.3d 602, 609 (2d

Cir. 2007) (“Section 105(a) grants broad equitable power to the bankruptcy courts to carry out the provisions of the Bankruptcy Code so long as that power is exercised within the confines of the Bankruptcy Code.”); *see e.g., In re MF Global Holdings, Ltd.*, 464 B.R. 619, 623 (Bankr. S.D.N.Y. 2012) (recognizing the bankruptcy court’s “inherent authority ‘to control disposition of the causes on its docket with economy of time and effort for itself, for counsel and for litigants’”) (quoting *Lester-Krebs, Inc. v. Geffen Records, Inc.*, No. 85 Civ. 6320, 1985 WL 4270, at \*2 (S.D.N.Y. Dec. 4, 1985)); *see also Louis Vuitton Malletier S.A. v. LY USA, Inc.*, 676 F.3d 83, 96 97 (2d Cir. 2012) (same).

20. Last, Bankruptcy Rule 9006(b) provides that the Court “for cause shown may at any time in its discretion” extend a deadline “if the request therefor is made before the expiration of the period originally prescribed.” FED. R. BANKR. P. 9006(b)(1).

21. Extensions of the time to object to claims are frequently granted in other chapter 11 cases in this District where there are a substantial number of claims and complex issues. *See, e.g., In re MF Global Holdings Ltd.*, Case No. 11-15059 (MG), (Bankr. S.D.N.Y. Aug. 23, 2016) (initial deadline extended by more than two (2) years and eight (8) months); *In re Motors Liquidation Corp.*, No. 09-50026 (REG) (Bankr. S.D.N.Y. Mar. 18, 2014) (initial deadline extended by more than two (2) years and eleven (11) months); *In re Extended Stay Inc.*, Case No. 09-13764 (JMP) (Bankr. S.D.N.Y. Oct. 19, 2011) (initial deadline extended by more than one (1) year); *In re Refco Inc.*, Case No. 05-60006 (RDD) (Bankr. S.D.N.Y. July 8, 2010) (initial deadline extended by more than three (3) years and eight (8) months).

22. The Plan Administrator, GUC Recovery Trustee, and Consumer Representative respectfully submit that the proposed extension of the Claim Objection Deadline under the Third Amended Plan is appropriate and reasonable. As described above, the Reviewing

Parties have reconciled a significant majority of claims filed in these chapter 11 cases and expect the majority of remaining Proofs of Claim to be reconciled, settled, or otherwise resolved in the near future. The resolution of certain claims such as Consumer Creditor Claims may be addressed in an omnibus or summary fashion, however, even in such cases, reconciliation of such claims is often a time-consuming process due to the extensive coordination among the Plan Administrator, Consumer Representative, GUC Recovery Trustee, and affected claimants regarding such claimant's mortgage, requisite account correction, and whether a claim is properly classified as a Consumer Creditor Claim or a General Unsecured Claim. Furthermore, certain of the remaining Proofs of Claim may involve unique facts and legal issues that require significant time and individual attention. Accordingly, the Reviewing Parties require additional time to adequately review and reconcile the remaining Proofs of Claim.

23. Extending the Claim Objection Deadline will inure to the benefit of all parties in interest. An extension will provide the Reviewing Parties with sufficient opportunity to identify, review, and analyze the remaining Proofs of Claim, determine the validity of each Proof of Claim, discharge their duties to creditors, and make the appropriate determination as to how to proceed with respect to disputed Proofs of Claim. The Reviewing Parties submit it would be a waste of resources to prematurely file objections to Proofs of Claim while these efforts are ongoing.

24. The requested extension of approximately one-hundred eighty (180) days is reasonable, and granting the relief requested herein will not prejudice any creditor in these chapter 11 cases. Furthermore, an extension of the Claim Objection Deadline will provide the Reviewing Parties with additional time to engage in meaningful negotiations and comprehensive resolutions

with claimants to consensually resolve Proofs of Claim without judicial intervention and/or unnecessary claim objections.

**Notice**

25. Notice of this Motion will be provided in accordance with the procedures set forth in the *Order Implementing Certain Notice and Case Management Procedures* (ECF No. 211) (the “**Case Management Order**”). The Plan Administrator, GUC Recovery Trustee, and Consumer Representative respectfully submit that no further notice is required.

26. No previous request for the relief sought herein has been made by the Plan Administrator, GUC Recovery Trustee, or Consumer Representative to this or any other Court.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE the Plan Administrator, GUC Recovery Trustee, and Consumer Representative respectfully request that the Court grant the relief requested herein and such other and further relief as it deems just and proper.

Dated: December 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.  
Sunny Singh  
*Attorneys for Plan Administrator  
and Wind Down Estates*

/s/ Beth Levine  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, New York 10017  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777  
Robert J. Feinstein  
Bradford J. Sandler  
Shirley S. Cho  
Beth Levine  
*Attorneys for GUC Recovery Trust*

/s/ Richard Levin  
JENNER & BLOCK LLP  
919 Third Avenue  
New York, New York 10022  
(212) 891-1600  
Richard Levin  
*Attorneys for Consumer Representative*

**Exhibit A**

**Proposed Order**

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

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

**ORDER GRANTING  
SIXTH JOINT MOTION OF PLAN ADMINISTRATOR,  
GUC RECOVERY TRUSTEE, AND CONSUMER REPRESENTATIVE  
FOR EXTENSION OF PERIOD TO FILE OBJECTIONS TO PROOFS OF CLAIM**

Upon the motion dated December 27, 2021 (the “**Motion**”) <sup>2</sup> of 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**”), META Advisors LLC, in its capacity as Trustee of the Ditech Holding Corporation GUC Recovery Trust (the “**GUC Recovery Trustee**”) acting on behalf of the Ditech Holding Corporation GUC Recovery Trust (the “**GUC Recovery Trust**”); and Tara Twomey, the consumer representative appointed under the Third Amended Plan (the “**Consumer Representative**”), pursuant to section 105(a) of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 9006(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), for an

---

<sup>1</sup> On September 26, 2019, the Court confirmed the *Third Amended Joint Chapter 11 Plan of Ditech Holding Corporation and Its Affiliated Debtors* (ECF No. 1404) (the “**Third Amended Plan**”), which created the Wind Down Estates. The 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). The Wind Down Estates’ principal offices are located at 2600 South Shore Blvd., Suite 300, League City, TX 77573.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion or the Third Amended Plan, as applicable.



order extending the Claim Objection Deadline by one-hundred eighty (180) days, through and including July 20, 2022, without prejudice to the ability of the Plan Administrator, GUC Recovery Trustee, or Consumer Representative to request further extensions, all as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference M-431*, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before the court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the notice parties in accordance with the Case Management Order; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Wind Down Estates, creditors, and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT**

1. The Motion is granted to the extent set forth herein.
2. The Claim Objection Deadline in section 7.1 of the Third Amended Plan is hereby extended for an additional period of one-hundred eighty (180) days, **through and including July 20, 2022.**

3. This Order is without prejudice to the rights of the Plan Administrator, GUC Recovery Trustee, and Consumer Representative to request further extensions of the Claim Objection Deadline.

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

Dated: \_\_\_\_\_, 2022  
New York, New York

---

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