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*Attorneys for Debtors
and Debtors in Possession*

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

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

**NOTICE OF FILING OF
PROPOSED STIPULATION AND ORDER GRANTING EXTENSION
TO LAWRENCE AND BETTY GINSBERG FOR FILING PROOF OF CLAIMS**

PLEASE TAKE NOTICE that on June 27, 2019, Ditech Holding Corporation (f/k/a Walter Investment Management Corp.) and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) hereby file the proposed *Stipulation and Order Granting Certain Extension to Lawrence and Betty Ginsberg for*

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 Debtors’ principal offices are located at 1100 Virginia Drive, Suite 100, Fort Washington, Pennsylvania 19034.

Filing Proof of Claims (the “**Stipulation and Order**”), annexed hereto as **Exhibit A**.

Dated: June 27, 2019
New York, New York

/s/ Sunny Singh
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Exhibit A

Proposed Stipulation and Order

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**UNITED STATES BANKRUPTCY COURT
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| In re | : | Chapter 11 |
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| DITECH HOLDING CORPORATION, et al., | : | Case No. 19-10412 (JLG) |
| | : | |
| Debtors.¹ | : | (Jointly Administered) |
| | : | Related Docket No. 90 |
| ----- | X | |

**STIPULATION AND ORDER GRANTING EXTENSION TO
LAWRENCE AND BETTY GINSBERG FOR FILING PROOF OF CLAIMS**

This stipulation and order (the “**Stipulation and Order**”) is entered into this June 27, 2019, by and among the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), on the one hand, and Lawrence and Betty Ginsberg on behalf of the deceased

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 Debtors’ principal offices are located at 1100 Virginia Drive, Suite 100, Fort Washington, Pennsylvania 19034.

Sophie Bloom Ginsberg (together with the Debtors, the “**Parties**”) on the other hand. The Parties hereby stipulate and agree to the following terms and conditions:

WHEREAS, on February 11, 2019, each of the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”);

WHEREAS, on February 22, 2019, the Bankruptcy 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 Procedures Order**”) establishing, subject to extension by the Debtors, April 1, 2019 as the last date (other than for governmental units) to file proofs of claim against one or more of the Debtors;

WHEREAS, on March 27, 2019 the Bankruptcy Court entered the *Order Extending the General Bar Date* (ECF No. 272) (the “**Bar Date Order**”) establishing, subject to extension by the Debtors, April 25, 2019 as the last date (other than for governmental units) to file proofs of claim against one or more of the Debtors;

WHEREAS, on April 30, 2019 the Bankruptcy Court entered the *Order Further Extending the General Bar Date for Filing Proofs of Claim for Consumer Borrowers Nunc Pro Tunc* (ECF No. 496) (the “**Extended Bar Date Order**”) establishing June 3, 2019 at 5:00 p.m. as the last date for consumer borrowers to file proofs of claim against one or more of the Debtors (the “**Extended Bar Date**”);

WHEREAS, Sophie Bloom Ginsberg, who may have held a claim against the Debtors, died on May 20, 2019;

WHEREAS, Lawrence and Betty Ginsberg, as Sophie Ginsberg’s successors in interest, assert they did not have sufficient time to consider, prepare, and file a proof of claim in the circumstances;

WHEREAS, Lawrence and Betty Ginsberg have requested, and the Debtors have consented, to extend the Bar Date for them to file a proof of claim, the Debtors have agreed to extend the Bar Date by thirty (30) days calendar days to **July 3, 2019**.

NOW, THEREFORE, the Parties hereby stipulate and agree:

1. Lawrence and Betty Ginsberg's proof of claim shall be deemed timely filed notwithstanding the occurrence of the Extended Bar Date, provided that Lawrence and Betty Ginsberg shall cause such proof of claim to be actually filed within thirty (30) calendar days from the Extended Bar Date, no later than **July 3, 2019 at 5:00 p.m. (EST)**.

2. Absent further order of the Bankruptcy Court, failure to comply with this Stipulation and Order by timely filing a proof of claim in the appropriate form as set forth below shall be barred from: (i) asserting such claim against the Debtors and their Chapter 11 estates; and (ii) participating in any distribution in these Chapter 11 cases on account of such claim.

3. The remaining provisions of the Bar Date Procedures Order, Bar Date Order, and Extended Bar Date Order shall continue to apply.

4. This Stipulation and Order is without prejudice to, and expressly reserves, the rights of all parties-in-interest to contest the allowance of any such claims. This Stipulation and Order and the relief granted herein is without prejudice to the Parties' rights, arguments, claims or defenses for all purposes.

5. Neither this Stipulation and Order nor any negotiations and writings in connection with this Stipulation and Order shall in any way be construed as or deemed to constitute: (a) an admission of liability by the Debtors with respect to any claim asserted by the Proofs of Claim; or (b) evidence of or an admission on behalf of any Party regarding any claim or right that such Party may have against the other Party. In any action or proceeding concerning

this Stipulation and Order, the provisions hereof shall be construed as if jointly drafted by the Parties.

6. Each of the Parties hereto represents and warrants: (a) it is duly authorized to enter into and be bound by this Stipulation and Order; and (b) this Stipulation and Order is duly executed and delivered and, subject to Bankruptcy Court approval, constitutes a valid and binding agreement in accordance with its terms.

7. This Stipulation and Order sets forth the entire understanding of the Parties hereto with respect to the matter set forth herein, is intended to be the complete and exclusive statement of the terms thereof, and may not be modified or amended except by a writing signed by the Parties and/or their counsel.

8. The terms and conditions of this Stipulation and Order shall be immediately effective and enforceable upon its entry by the Bankruptcy Court.

9. The Bankruptcy Court shall retain jurisdiction over all matters related to
this Stipulation and Order.

Dated: New York, New York
June 27, 2019

WEIL, GOTSHAL & MANGES LLP

/s/ Lawrence David Ginsberg

Lawrence David Ginsberg
Larrydg@earthlink.net

/s/ Sunny Singh

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*Attorneys for Debtors
and Debtors in Possession*

SO ORDERED THIS
__ DAY OF ____, 2019

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