

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE SEVENTEENTH 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 QUESTIONS, PLEASE CONTACT THE PLAN ADMINISTRATOR’S COUNSEL, PATRICK FEENEY, ESQ., AT 212-310-8269 OR PATRICK.FEENEY@WEIL.COM, AND THE CONSUMER REPRESENTATIVE, TARA TWOMEY, AT TTWOMEY@DITECH-SETTLEMENT.COM.

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

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

NOTICE OF HEARING ON SEVENTEENTH OMNIBUS CLAIMS OBJECTION TO PROOFS OF CLAIM (NO BASIS CONSUMER CREDITOR CLAIMS)

PLEASE TAKE NOTICE that, on January 17, 2020, 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**”), and the

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

Consumer Representative filed the *Seventeenth Omnibus Objection to Proofs of Claim (No Basis Consumer Claims)* (the “**Objection**”) with 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 and the Consumer Representative believe there is no basis for the Proof(s) of Claim.³ **Any claim that the Bankruptcy Court expunges and disallows 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.

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.

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 Objection that is received on or before **4:00 p.m. Prevailing Eastern Time on February 14, 2020** (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; (ii) Weil, Gotshal, & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Angeline Hwang, Esq.; Patrick Feeney, Esq.; and Cliff Sonkin, Esq.), attorneys

for the Plan Administrator; and (iii) the Ditech Consumer Recovery Trust, c/o Settlement Administrator, P.O. Box 1607, Blue Bell, PA 19422.

Except as otherwise permitted under the Claim Hearing Procedures, a hearing to consider the Objection will be held on **February 25, 2020, 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 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.

You may participate in a hearing telephonically provided that you comply with the Court's instructions (including, without limitation, providing prior written notice to counsel for the Plan Administrator and any statutory committees), which can be found on the Court's website at www.nysb.uscourts.gov.

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. **CLAIMANTS**

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

Dated: January 17, 2020
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

/s/ Tara Twomey
Ditech Consumer Recovery Trust,
c/o Settlement Administrator,
P.O. Box 1607
Blue Bell, PA 19422
Telephone: (831) 920-7460
Tara Twomey

Consumer Representative

Exhibit A

Claim Hearing Procedures

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

-----X
: **Chapter 11**
: **Case No. 19-10412 (JLG)**
: **(Jointly Administered)**
: **Debtors.¹**
: **(Jointly Administered)**
-----X

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). The Wind Down Estates’ principal offices are located at 1100 Virginia Drive, Suite 100, Fort Washington, Pennsylvania 19034.

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: February 25, 2020 at 11:00 a.m. (Eastern Time)
Response Deadline: February 14, 2020 at 4:00 p.m. (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**

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

**SEVENTEENTH OMNIBUS OBJECTION TO
PROOFS OF CLAIM (NO BASIS CONSUMER CREDITOR 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, PATRICK FEENEY, ESQ., AT (212) 310-8269 OR PATRICK.FEENEY@WEIL.COM, AND THE CONSUMER REPRESENTATIVE, TARA TWOMEY, AT TTWOMEY@DITECH-SETTLEMENT.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). The Wind Down Estates’ principal offices are located at 1100 Virginia Drive, Suite 100, Fort Washington, Pennsylvania 19034.

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**”), and the Consumer Representative respectfully represent as follows in support of this joint 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 and the Consumer Representative file this Objection pursuant to the Claims Procedures Order, seeking entry of an order disallowing and expunging the Consumer Creditor Claims listed on **Exhibit A** annexed hereto (the “**No Basis Consumer Creditor Claims**”).

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

as described in **Exhibit A** annexed hereto under the heading “Basis for Objection.” The Plan Administrator and the Consumer Representative believe the No Basis Consumer Creditor Claims are not merely unsecured Consumer Creditor Claims that have been erroneously asserted in part as an administrative expense, priority, and/or secured claim, but rather are Claims that have no basis at all in their entirety based on the Debtors’ books and records and the supporting documentation submitted by the Borrower, if any.

14. The Plan Administrator and Consumer Representative, therefore, request that the No Basis Consumer Creditor 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 Consumer Creditor 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).

17. The Plan Administrator and the Consumer Representative have reviewed the No Basis Consumer Creditor Claims, all documents furnished by the Borrowers with respect

to the No Basis Consumer Creditor Claims, if any, and the Debtors' books and records, and have determined that no amounts are due and owing on account of the No Basis Consumer Creditor Claims in the asserted amount and asserted priority. Therefore, the Plan Administrator seeks entry of the Proposed Order disallowing and expunging in their entirety the No Basis Consumer Creditor Claims.

Separate Contested Matters

18. To the extent a Response is filed regarding any claim listed in this Objection and the Plan Administrator and Consumer Representative are unable to resolve the Response, the objection by the Plan Administrator and the Consumer Representative 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

19. The Plan Administrator and Consumer Representative hereby reserve 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

20. 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 Borrowers. The Plan Administrator and the Consumer Representative respectfully submit that no further notice is required.

21. No previous request for the relief sought herein has been made by the Plan Administrator and/or the Consumer Representative to this or any other Court.

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

Dated: January 17, 2020
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

/s/ Tara Twomey
Ditech Consumer Recovery Trust,
c/o Settlement Administrator,
P.O. Box 1607
Blue Bell, PA 19422
Telephone: (831) 920-7460
Tara Twomey

Consumer Representative

Exhibit A

No Basis Consumer Creditor Claims

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: LOANCARE 20375 NE 22ND PL MIAMI, FL 331801318	Claim To Be Disallowed 20847	Ditech Financial LLC	\$220,000.00	\$0.00	\$0.00	\$0.00	\$220,000.00
	Filed On: 4/22/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SENN, SHERYL & MARTHA MCLIN 18463 WISP WILLOW WAY PORTER, TX 77365	Claim To Be Disallowed 24644	Ditech Holding Corporation	\$21,034.58	\$0.00	\$21,034.58	\$0.00	\$21,034.58
	Filed On: 11/11/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SERGEI KOLESOV A/K/A SERGEI KALSOW C/O ROMAN V GAMBOURG ESQ 200 LIBERTY STREET, 23RD FL NEW YORK, NY 10281	Claim To Be Disallowed 2114	Ditech Holding Corporation	\$99,000.00	\$0.00	\$0.00	\$0.00	\$99,000.00
	Filed On: 6/3/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SERGENT, AMBER 3509 WEST JEAN DR GALVESTON, TX 77554	Claim To Be Disallowed 20431	Ditech Holding Corporation	\$122,300.00	\$0.00	\$0.00	\$0.00	\$122,300.00
	Filed On: 4/5/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SERIO, FRED 136 MELROSE COURT FREDERICK, MD 21702	Claim To Be Disallowed 23845	Ditech Financial LLC	\$242,177.21	\$0.00	\$0.00	\$0.00	\$242,177.21
	Filed On: 6/4/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SETTANNI, KENNETH 474 WINANT AVENUE STATEN ISLAND, NY 10309	Claim To Be Disallowed 20698	Ditech Holding Corporation	\$13,206.20	\$0.00	\$0.00	\$0.00	\$13,206.20
	Filed On: 4/16/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SEVER, TERRI A 555 CHERRYDALE DRIVE FLORISSANT, MO 63031	Claim To Be Disallowed 22938	Ditech Financial LLC	\$70,000.00	\$0.00	\$0.00	\$0.00	\$70,000.00
	Filed On: 5/29/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SHAFER, JAMES DAVID 202 BEAUDELAIRE DR WEATHERFORD, TX 76087-9444	Claim To Be Disallowed 20591	Ditech Holding Corporation	\$110,624.00	\$0.00	\$0.00	\$60,829.41	\$171,453.41
	Filed On: 4/11/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SHAH, SYED 35 MARTINS WAY LINCOLN, RI 02865	Claim To Be Disallowed 20813	Ditech Holding Corporation	\$340,000.00	\$0.00	\$0.00	\$0.00	\$340,000.00
	Filed On: 4/21/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SHAW, GEORGIA A 758 AMY LANE GRETNA, LA 70056	Claim To Be Disallowed 22667	Ditech Holding Corporation	\$178,000.00	\$0.00	\$0.00	\$0.00	\$178,000.00
	Filed On: 5/22/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SHELLEDY, KIMBERLY 1161 COLUMBINE CIR NORWALK, IA 50211	Claim To Be Disallowed 20585	Ditech Holding Corporation	\$5,000.00	\$0.00	\$10,000.00	\$119,000.00	\$134,000.00
	Filed On: 4/11/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SHERIDAN, EDWARD AND TERESA 1125 NE MEADOW DRIVE PORTLAND, OR 97211	Claim To Be Disallowed 22913	Ditech Holding Corporation	\$77,295.30	\$0.00	\$0.00	\$0.00	\$77,295.30
	Filed On: 5/28/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SHERIDAN, EDWARD AND TERESA 1125 NE MEADOW DRIVE PORTLAND, OR 97211	Claim To Be Disallowed 23058	Ditech Financial LLC	\$77,300.00	\$0.00	\$0.00	\$0.00	\$77,300.00
	Filed On: 5/30/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SHERROD, JANNIE B 4060 HIGHWAY 86 PICKENSVILLE, AL 35447	Claim To Be Disallowed 22511	Ditech Holding Corporation	\$70,000.00	\$0.00	\$0.00	\$0.00	\$70,000.00
	Filed On: 5/19/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SHERYL SENN AND MARTHA MCLIN 18463 WISP WILLOW WAY PORTER, TX 77365	Claim To Be Disallowed 60236	Ditech Financial LLC	\$0.00	\$21,034.58	\$0.00	\$0.00	\$21,034.58
	Filed On: 11/11/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SHIMASAKI, GARY 400 DAVIS ST #210 SAN LEANDRO, CA 94577	Claim To Be Disallowed 23364	Green Tree Servicing Corp.	\$270,000.00	\$0.00	\$0.00	\$130,000.00	\$400,000.00
	Filed On: 6/2/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SHOOK, CORY L 315 HARBAUGH DRIVE UNIT B FORT CAMPBELL, KY 42223	Claim To Be Disallowed 22506	Ditech Holding Corporation	\$165,000.00	\$0.00	\$0.00	\$0.00	\$165,000.00
	Filed On: 5/19/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SHORT, MICHAEL A 314 OLD STATE ROUTE 66 GREENSBURG, PA 15601	Claim To Be Disallowed 20632	Ditech Holding Corporation	\$120,000.00	\$0.00	\$0.00	\$0.00	\$120,000.00
	Filed On: 4/13/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SIEVERS, FRANCIS 2838 DRAGON FLY WAY ODENTON, MD 21113	Claim To Be Disallowed 21744	Ditech Financial LLC	\$260,000.00	\$0.00	\$0.00	\$0.00	\$260,000.00
	Filed On: 5/9/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SILVA, IRIS PO BOX 29446 PROVIDENCE, RI 02909	Claim To Be Disallowed 21741	Ditech Holding Corporation	\$198,823.00	\$0.00	\$0.00	\$0.00	\$198,823.00
	Filed On: 5/9/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SILVA, LAURA 329 CHURCH ST CATASAUQUA, PA 18032	Claim To Be Disallowed 20530	Ditech Holding Corporation	\$92,000.00	\$0.00	\$0.00	\$42,000.00	\$134,000.00
	Filed On: 4/9/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SIMMONS, FRANK 118 QWIN GOOSE CREEK, SC 29445	Claim To Be Disallowed Filed On: 6/5/2019	2168 Ditech Holding Corporation	\$130,000.00	\$0.00	\$0.00	\$0.00	\$100,000.00
			Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SIMMONS, LENA R 25575 AL HIGHWAY 9 GOODWATER, AL 35072	Claim To Be Disallowed Filed On: 5/28/2019	1902 Ditech Holding Corporation	\$26,575.00	\$0.00	\$0.00	\$0.00	\$26,575.00
			Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SIMPANEN, KEITH 197 LEWIS FARM RD GREENE, RI 02827	Claim To Be Disallowed Filed On: 5/12/2019	21957 Ditech Financial LLC	\$118,000.00	\$0.00	\$0.00	\$0.00	\$118,000.00
			Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SIMPER, TRENTON B 1309 LIBERTY AVE OGDEN, UT 84404	Claim To Be Disallowed 1528	Ditech Financial LLC	\$83,255.48	\$0.00	\$0.00	\$99,744.52	\$83,255.48
	Filed On: 4/26/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SIMPSON, CAROL VICTOR V BLAKELY 516 5TH AVENUE NW MOULTRIE, GA 31768	Claim To Be Disallowed 905	Ditech Holding Corporation	\$16,903.00	\$0.00	\$0.00	\$0.00	\$16,903.00
	Filed On: 4/10/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SIMS, SANDRA PO BOX 38307 HOUSTON, TX 77238	Claim To Be Disallowed 23353	Ditech Holding Corporation	\$120,000.00	\$0.00	\$0.00	\$0.00	\$120,000.00
	Filed On: 6/2/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SIMS, SARETTA L 7811 S INGLESIDE CHICAGO, IL 60619	Claim To Be Disallowed 23088	Ditech Holding Corporation	\$117,137.67	\$0.00	\$0.00	\$0.00	\$117,137.67
	Filed On: 5/30/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SINGLETON, JOANNA L 316 ELKINS ROAD WHITE HALL, AR 71602-9742	Claim To Be Disallowed 23673	Ditech Holding Corporation	\$62,000.00	\$0.00	\$0.00	\$0.00	\$62,000.00
	Filed On: 6/3/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SKELLINGTON-BICE, ANGELA M PO BOX 6172 RAPID CITY, SD 57709-6172	Claim To Be Disallowed 20487	Green Tree Servicing Corp.	\$45,220.00	\$0.00	\$524.42	\$24,780.00	\$70,524.42
	Filed On: 4/8/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SKLAR, BRENDON & STEPHANIE 3650 BERNAY DR NORTHBROOK, IL 60062	Claim To Be Disallowed 22237	Ditech Financial LLC	\$0.00	\$0.00	\$7,437.27	\$0.00	\$4,409.63
	Filed On: 5/14/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SMALL, ELISE 5746 RAVEN RD BLOOMFIELD HILLS, MI 48301	Claim To Be Disallowed 2036	Ditech Holding Corporation	\$175,000.00	\$0.00	\$0.00	\$225,000.00	\$400,000.00
	Filed On: 6/3/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SMALL, KATHERINE 5237 KIMBARK WOODS DRIVE MEMPHIS, TN 38134	Claim To Be Disallowed 20513	Ditech Holding Corporation	\$25,000.00	\$20,000.00	\$0.00	\$25,000.00	\$2,511.76
	Filed On: 4/8/2019		Reason for Objection: Claim determined to have no merit based on Company review. Claimant identified as former customer of the Debtor.				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SMITH, BETTY 2718 N 46TH ST MILWAUKEE, WI 53210	Claim To Be Disallowed 20456	Ditech Holding Corporation	\$66,164.85	\$0.00	\$0.00	\$0.00	\$66,164.85
	Filed On: 4/7/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SMITH, CATHI 3153 ROOSEVELT DR TYLER, TX 75705	Claim To Be Disallowed 2010	Ditech Holding Corporation	\$46,742.27	\$0.00	\$3,025.00	\$46,742.27	\$46,742.27
	Filed On: 6/3/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SMITH, CURTIS A 55 HENRY SMITH RD TYLERTOWN, MS 39667	Claim To Be Disallowed 1333	Ditech Holding Corporation	\$176,292.00	\$0.00	\$0.00	\$0.00	\$176,292.00
	Filed On: 4/25/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SMITH, CYNTHIA A, EXECUTOR FOR THE ESTATE OF RICHARD W & MARJORIE J SMITH PO BOX 1818 SILVERDALE, WA 98383	Claim To Be Disallowed Filed On: 4/26/2019	1464 Ditech Holding Corporation	\$41,403.00	\$0.00	\$0.00	\$0.00	\$41,403.00
			Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

Creditor: SMITH, GAIL 169 MCGEE ROAD CANON, GA 30520	Claim To Be Disallowed Filed On: 4/25/2019	21385 Ditech Holding Corporation	\$38,000.00	\$0.00	\$0.00	\$0.00	\$38,000.00
			Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

Creditor: SMITH, GEROGE C 7605 NEWTON DR BILOXI, MS 29532	Claim To Be Disallowed Filed On: 5/30/2019	1961 Ditech Holding Corporation	\$26,000.00	\$0.00	\$74,000.00	\$0.00	\$100,000.00
			Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SMITH, MARCUS 3047 CONSTELLATION DR MELBOURNE, FL 32940	Claim To Be Disallowed 23948	Ditech Holding Corporation	\$181,655.00	\$0.00	\$0.00	\$0.00	\$181,655.00
	Filed On: 6/17/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SMITH, PHILIP S 5 HUNT ROAD WESTFORD, MA 01886	Claim To Be Disallowed 24138	Ditech Holding Corporation	\$5,000.00	\$5,000.00	\$5,000.00	\$0.00	\$5,000.00
	Filed On: 10/2/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SMITH, RICHARD W & MARJORIE J PO BOX 1818 SILVERDALE, WA 98383	Claim To Be Disallowed 22853	Ditech Holding Corporation	\$4,300.00	\$43,000.00	\$0.00	\$0.00	\$43,000.00
	Filed On: 5/27/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SMITH, SHERRILL 4912 CROSSHILL LANE NORTHPORT, AL 35473	Claim To Be Disallowed 22474	Ditech Financial LLC	\$42,131.56	\$0.00	\$0.00	\$0.00	\$42,131.56
	Filed On: 5/18/2019		Reason for Objection: Claim determined to have no merit based on Company review.				
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Creditor: SMITH, TEMEKA 9731 MARSHBROOKE RD MATTHEWS, NC 28105	Claim To Be Disallowed 22515	Ditech Financial LLC	\$126,000.00	\$0.00	\$0.00	\$77,000.00	\$203,000.00
	Filed On: 5/19/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SMITH, WILLIAM 201 RARITAN RIVER ROAD ANNANDALE, NJ 08801	Claim To Be Disallowed 21239	Green Tree Servicing Corp.	\$20,000.00	\$0.00	\$0.00	\$0.00	\$20,000.00
	Filed On: 4/25/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SMITH-KING, KIMBERLY 41512 BURROUGHS NOVI, MI 48377	Claim To Be Disallowed 24170	Ditech Holding Corporation	\$0.00	\$0.00	\$56,000.00	\$0.00	\$56,000.00
	Filed On: 10/2/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SONS, TIMOTHY A & JESSICA L 5707 4TH AVENUE NW BRADENTON, FL 34209	Claim To Be Disallowed 21694	Ditech Holding Corporation	\$175,000.00	\$0.00	\$0.00	\$75,000.00	\$250,000.00
	Filed On: 5/8/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SOUZA, JOSEPH CHESTER 180 HIGH STREET NORTH ANDOVER, MA 01845	Claim To Be Disallowed 20829	Ditech Holding Corporation	\$4,135.00	\$0.00	\$3,450.00	\$0.00	\$4,137.00
	Filed On: 4/22/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SPARKS, MARC A 4022 202ND ST E SPANAWAY, WA 98387	Claim To Be Disallowed 22113	Ditech Holding Corporation	\$290,000.00	\$0.00	\$1,000.00	\$0.00	\$291,000.00
	Filed On: 5/13/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SPEAKMAN, RONALD 628 N JAMESON AVE LIMA, OH 45805	Claim To Be Disallowed 22058	Ditech Holding Corporation	\$60,740.63	\$0.00	\$0.00	\$0.00	\$60,740.63
	Filed On: 5/13/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SPIELMAN, MICHAEL 577 MARSH AVE RENO, NV 89509	Claim To Be Disallowed 22488	Ditech Holding Corporation	\$79,565.25	\$0.00	\$2,850.00	\$0.00	\$82,415.25
	Filed On: 5/18/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SPRATLING, DANIEL & SANDRA 727 MINTER RD CAMP HILL, AL 36850	Claim To Be Disallowed 1025	Ditech Holding Corporation	\$67,318.85	\$8,380.00	\$7,680.00	\$0.00	\$7,680.00
	Filed On: 4/16/2019		Reason for Objection: Claim determined to have no merit based on Company review. Account correction processed.				
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Creditor: ST CLAIR, DEBORAH L 670 BROADWAY AVENUE CARSON BUSINESS CENTER BEDFORD, OH 43246	Claim To Be Disallowed 22760	Ditech Financial LLC	\$172,723.60	\$0.00	\$0.00	\$0.00	\$172,723.60
	Filed On: 5/24/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: STACY, TERRY 6551 VONNIE VALE CT HAMILTON, OH 45011	Claim To Be Disallowed 23481	Ditech Holding Corporation	\$0.00	\$0.00	\$20,000.00	\$0.00	\$20,000.00
	Filed On: 6/3/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: STANDRIDGE, DEBORAH C 111 HILLY ROCK ROAD LEXINGTON, SC 29072	Claim To Be Disallowed 22306	Ditech Holding Corporation	\$280,000.00	\$0.00	\$0.00	\$9,000.00	\$289,000.00
	Filed On: 5/15/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: STAPLES, DOROTHY 612 SOUTH JACKSON ST BATAVIA, IL 60510	Claim To Be Disallowed 23267	Reverse Mortgage Solutions, Inc.	\$227,173.15	\$0.00	\$0.00	\$22,827.00	\$250,000.15
	Filed On: 6/2/2019		Reason for Objection: Claim determined to have no merit based on Company review.				
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Creditor: STARR, DEWEY 658 W HUNT RD ALCOA, TN 37701	Claim To Be Disallowed 22980	Ditech Holding Corporation	\$113,453.13	\$0.00	\$0.00	\$0.00	\$113,453.13
	Filed On: 5/29/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: STEELE, CATHLEEN M 544 CYPRESS LANE SEVERNA PARK, MD 21146	Claim To Be Disallowed Filed On: 5/10/2019	21803 Reverse Mortgage Solutions, Inc.	\$265,000.00	\$0.00	\$0.00	\$0.00	\$265,000.00
				Reason for Objection:	Claim lacks sufficient documentation to support the validity of the claim		
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Creditor: STEELE, CHRISTINNE 3283 ZION RIDGE RD LOUISVILLE, MS 39339-6449	Claim To Be Disallowed Filed On: 4/23/2019	1205 Ditech Holding Corporation	\$17,633.96	\$0.00	\$0.00	\$0.00	\$17,633.96
				Reason for Objection:	Claim lacks sufficient documentation to support the validity of the claim		
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Creditor: STERLING, WILLIAM 3209 JAMESTON DR FLOWER MOUND, TX 75028	Claim To Be Disallowed Filed On: 5/14/2019	22173 Ditech Financial LLC	\$10,000.00	\$0.00	\$0.00	\$0.00	\$10,000.00
				Reason for Objection:	Claim lacks sufficient documentation to support the validity of the claim		
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No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: STEVE ALKANA 1901 AVE OF THE STARS, #855 LOS ANGELES, CA 90067	Claim To Be Disallowed 22771	Reverse Mortgage Solutions, Inc.	\$344,000.00	\$0.00	\$2,294.18	\$0.00	\$346,294.18
	Filed On: 5/24/2019		Reason for Objection: Claim determined to have no merit based on Company review. Account correction processed.				
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Creditor: STEWART, EARNEST 4236 E 188TH ST CLEVELAND, OH 44122	Claim To Be Disallowed 1643	Ditech Holding Corporation	\$95,000.00	\$0.00	\$0.00	\$42,336.58	\$137,336.58
	Filed On: 4/30/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: STEWART, EARNEST 4236 EAST 188TH STREET CLEVELAND, OH 44122	Claim To Be Disallowed 2205	Ditech Holding Corporation	\$95,000.00	\$0.00	\$0.00	\$40,000.00	\$135,000.00
	Filed On: 6/6/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: STONE, JEROME 208 PEARL ST UNIT L BOULDER, CO 80302	Claim To Be Disallowed 22159	Green Tree Servicing Corp.	\$341,000.00	\$0.00	\$0.00	\$251,000.00	\$592,000.00
	Filed On: 5/14/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: STOWE, MARCIA P 3939 HANNIBAL PL SAN DIEGO, CA 92115	Claim To Be Disallowed 23575	Reverse Mortgage Solutions, Inc.	\$111,000.00	\$0.00	\$0.00	\$0.00	\$111,000.00
	Filed On: 6/3/2019		Reason for Objection: Claim determined to have no merit based on Company review.				
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Creditor: STROEBE, CONRAD AND TERESA OK BOX 194 BILLINGS, MT 59103	Claim To Be Disallowed 21541	Ditech Holding Corporation	\$23,525.00	\$0.00	\$0.00	\$6,175.00	\$23,525.00
	Filed On: 4/26/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
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No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: STUMPF, JEREMY 29 MARLBORO STREET MORGANVILLE, NJ 07751	Claim To Be Disallowed 23142	Ditech Financial LLC	\$327,000.00	\$0.00	\$0.00	\$0.00	\$327,000.00
	Filed On: 5/31/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: STURMAN, MICHELE AND THOMAS 4328 OCEAN VIEW DR MALIBU, CA 90265	Claim To Be Disallowed 2448	Ditech Holding Corporation	\$995,000.00	\$0.00	\$0.00	\$0.00	\$995,000.00
	Filed On: 9/9/2019		Reason for Objection: Claim determined to have no merit based on Company review.				
Creditor: STURMAN, MICHELE IRENE 4328 OCEAN VIEW DR MALIBU, CA 90265	Claim To Be Disallowed 2685	Ditech Holding Corporation	\$1,535,000.00	\$0.00	\$0.00	\$0.00	\$1,210,000.00
	Filed On: 11/11/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

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No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: STUTTS, DOLAND L, JR 9818 ELDORADO DR BURLESON, TX 76028	Claim To Be Disallowed 23101	Ditech Holding Corporation	\$45,828.45	\$0.00	\$0.00	\$0.00	\$45,828.45
	Filed On: 5/30/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SUFFRIDGE, PAUL 284 SARATOGA WAY SHEPHERDSVILLE, KY 40165	Claim To Be Disallowed 23221	Ditech Holding Corporation	\$40,000.00	\$0.00	\$0.00	\$12,000.00	\$52,000.00
	Filed On: 6/1/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SUKANEC, AMANDA 1313 NORTH J TERRACE LAKE WORTH, FL 33460	Claim To Be Disallowed 20549	Ditech Holding Corporation	\$135,052.93	\$0.00	\$0.00	\$0.00	\$135,052.93
	Filed On: 4/9/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SULLIVAN, LISA 2355 RIVIERA DR DELRAY BEACH, FL 33445	Claim To Be Disallowed 22014	Ditech Holding Corporation	\$52,000.00	\$0.00	\$0.00	\$0.00	\$52,000.00
	Filed On: 5/13/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SULUKI, BENJAMIN PO BOX 24048 PHILADELPHIA, PA 19139	Claim To Be Disallowed 2196	Ditech Holding Corporation	\$42,932.59	\$0.00	\$0.00	\$0.00	\$42,932.59
	Filed On: 6/6/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SULUKI, NAEEMAH 1806 GARRETT ROAD LANSDOWNE, PA 19050	Claim To Be Disallowed 2195	Reo Management Solutions, LLC	\$197,720.40	\$0.00	\$0.00	\$0.00	\$197,720.40
	Filed On: 6/6/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
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No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SULUKI, NAEEMAH 6137 WALNUT STREET PHILADELPHIA, PA 19139	Claim To Be Disallowed 2197	Ditech Holding Corporation	\$33,333.19	\$0.00	\$0.00	\$0.00	\$33,333.19
	Filed On: 6/6/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SULUKI, NAEEMAH 1806 GARRETT RD LANSDOWNE, PA 19050	Claim To Be Disallowed 24513	Ditech Holding Corporation	\$31,335.44	\$62,670.88	\$0.00	\$31,335.44	\$31,335.44
	Filed On: 10/24/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SULUKI, NAEEMAH 1806 GARRETT RD LANSDOWNE, PA 19050	Claim To Be Disallowed 24514	Ditech Holding Corporation	\$195,933.15	\$391,866.30	\$0.00	\$0.00	\$195,933.15
	Filed On: 10/24/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SULUKI, NAEEMAH 1806 GARRETT RD LANSDOWNE, PA 19050	Claim To Be Disallowed 24515	Ditech Holding Corporation	\$31,335.44	\$62,670.88	\$31,335.44	\$0.00	\$125,341.76
	Filed On: 10/24/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: SUMMERS, KYLE B 8221 VERMILION DRIVE CHARLOTTE, NC 28215	Claim To Be Disallowed 1310	Ditech Holding Corporation	\$82,448.00	\$0.00	\$0.00	\$82,448.00	\$82,448.00
	Filed On: 4/25/2019		Reason for Objection: Claim determined to have no merit based on Company review.				
Creditor: SUMMERS, RONALD & ROSALIND 1467 N 18TH ST EL CENTRO, CA 92243	Claim To Be Disallowed 20689	Ditech Holding Corporation	\$69,488.30	\$0.00	\$0.00	\$0.00	\$69,488.30
	Filed On: 4/16/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SUSTAITA, ANA 210 TYLER AVE NE FORT PAYNE, AL 35967	Claim To Be Disallowed 23299	Ditech Holding Corporation	\$50,000.00	\$2,500.00	\$10,000.00	\$0.00	\$49,982.98
	Filed On: 6/2/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SUTCHE, CHARLES C/O CASSIE BONNER 3475 KIVETT LN MARTINSVILLE, IN 46151-8941	Claim To Be Disallowed 2697	Ditech Holding Corporation	\$0.00	\$85,000.00	\$0.00	\$0.00	\$85,000.00
	Filed On: 11/11/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
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Creditor: SWANK, DONALD D AND PEARL 2474 PUNTA DEL ESTE DR HACIENDA HIEGHTS, CA 91745	Claim To Be Disallowed 21165	Ditech Holding Corporation	\$133,344.00	\$0.00	\$0.00	\$0.00	\$133,344.00
	Filed On: 4/24/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: SYSAVATH, SEAN 6101 HUNTINGTON DR HALTOM CITY, TX 76137	Claim To Be Disallowed 22444	Ditech Holding Corporation	\$62,000.00	\$0.00	\$0.00	\$0.00	\$62,000.00
	Filed On: 5/17/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: TANG, HUNG T 13648 CHESTERFIELD DR MOORPARK, CA 93021	Claim To Be Disallowed 20764	Ditech Holding Corporation	\$100,000.00	\$0.00	\$0.00	\$100,000.00	\$200,000.00
	Filed On: 4/18/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: TANKSLEY, WILLIE 2507 B HORSESHOE DR HEPHZIBAH, GA 30815	Claim To Be Disallowed 1565	Ditech Holding Corporation	\$35,357.51	\$0.00	\$0.00	\$0.00	\$35,357.51
	Filed On: 4/29/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: TAYLOR, BONNIE G 248 CURRITUCK DR HOLLY RIDGE, NC 28445	Claim To Be Disallowed 20532	Ditech Holding Corporation	\$145,000.00	\$0.00	\$103,000.00	\$0.00	\$248,000.00
	Filed On: 4/9/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: TAYLOR, CARSON G 7231 HUCKLEBERRY RD NW OLYMPIA, WA 98502-3304	Claim To Be Disallowed 22307	Green Tree Servicing Corp.	\$300,000.00	\$0.00	\$0.00	\$0.00	\$300,000.00
	Filed On: 5/15/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: TAYLOR, GLORIA 19 N. THORPE KANSAS CITY, KS 66102	Claim To Be Disallowed 21169	Ditech Holding Corporation	\$61,955.01	\$0.00	\$0.00	\$40.00	\$61,995.01
	Filed On: 4/24/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: TAYLOR, GUY WAYNE PO BOX 1554 COLLIERVILLE, TN 38027	Claim To Be Disallowed 22243	Ditech Holding Corporation	\$92,000.00	\$0.00	\$92,000.00	\$0.00	\$184,000.00
	Filed On: 5/14/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: TAYLOR, MAE RENE C/O LEGAL SERVICES OF GREATER MIAMI INC ATTN MATT BAYARD ESQ 4343 W FLAGLER ST STE 100 MIAMI, FL 33134	Claim To Be Disallowed 23175	Reverse Mortgage Solutions, Inc.	\$28,465.78	\$0.00	\$0.00	\$0.00	\$28,465.78
	Filed On: 5/31/2019		Reason for Objection: Claim determined to have no merit based on Company review.				
Creditor: TAYLOR, MICHAEL 15 WOOLARD WAY NE LUDOWICI, GA 31316	Claim To Be Disallowed 935	Ditech Holding Corporation	\$0.00	\$0.00	\$38,000.00	\$0.00	\$42.00
	Filed On: 4/12/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,
Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: TAYLOR, STEPHEN A 100 BAFANWOOD STREET HOT SPRINGS, AR 71901	Claim To Be Disallowed Filed On: 4/18/2019	1067 Ditech Holding Corporation	\$31,000.00	\$0.00	\$0.00	\$15,000.00	\$46,000.00
				Reason for Objection:	Claim lacks sufficient documentation to support the validity of the claim		
Creditor: TERRY, MIMI 204 HANBURY AVE PORTSMOUTH, VA 23702	Claim To Be Disallowed Filed On: 10/17/2019	24460 Ditech Holding Corporation	\$131,000.00	\$0.00	\$0.00	\$131,000.00	\$131,000.00
				Reason for Objection:	Claim lacks sufficient documentation to support the validity of the claim		
Creditor: TERRY, SUSIE 1103 SUNDANCE FALL SAN ANTONIO, 78245	Claim To Be Disallowed Filed On: 10/3/2019	24244 Ditech Financial LLC	\$0.00	\$165,000.00	\$0.00	\$0.00	\$165,000.00
				Reason for Objection:	Claim lacks sufficient documentation to support the validity of the claim		

No Basis Consumer Claims

In re:Ditech Holding Corporation, et al.,

Case No 19-10412 Jointly Administered

No Basis Consumer Claims

Name and Address of Claimant	Claim #	Debtor	Secured	Administrative	Priority	Unsecured	Total
Creditor: TETENES, SHARON 774 TANGLEWOOD RD WEST ISLIP, NY 11795	Claim To Be Disallowed 23725	Ditech Financial LLC	\$187,884.00	\$0.00	\$0.00	\$0.00	\$187,884.00
	Filed On: 6/3/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: THAVISACK, PHETSALEUMSITH 5903 OBSIDIAN AVE SPRINGFIELD, OR 97478	Claim To Be Disallowed 22556	Ditech Holding Corporation	\$27,535.00	\$0.00	\$0.00	\$0.00	\$27,535.00
	Filed On: 5/20/2019		Reason for Objection: Claim lacks sufficient documentation to support the validity of the claim				
Creditor: THE ESTATE OF EDWARD B MAYELIAN 23045 SONOITA MISSION VIEJO, CA 92691	Claim To Be Disallowed 23663	Reverse Mortgage Solutions, Inc.	\$800,000.00	\$0.00	\$0.00	\$0.00	\$800,000.00
	Filed On: 6/3/2019		Reason for Objection: Claim determined to have no merit based on Company review.				
Claims To Be Disallowed Totals		99	\$13,216,757.88	\$867,122.64	\$488,630.89	\$1,668,258.22	\$14,795,289.89

Exhibit B

Proposed Order

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

-----X
: **Chapter 11**
: **Case No. 19-10412 (JLG)**
: **(Jointly Administered)**
: **Debtors.¹**
-----X

**ORDER GRANTING SEVENTEENTH OMNIBUS OBJECTION
TO PROOFS OF CLAIM (NO BASIS CONSUMER CREDITOR CLAIMS)**

Upon the *Seventeenth Omnibus Objection to Proofs of Claim (No Basis Consumer Creditor Claims)*, filed on January 17, 2020 (the “**Objection**”),² for an order (i) disallowing and expunging certain Consumer Creditor 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

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). The Wind Down Estates’ principal offices are located at 1100 Virginia Drive, Suite 100, Fort Washington, Pennsylvania 19034.

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

Procedures Order; and such notice having been adequate and appropriate under the circumstances; and the Bankruptcy Court having held a hearing to consider the relief requested in the Objection on February 25, 2020 (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 Consumer Creditor Claim listed on **Exhibit 1** annexed to this Order is disallowed and expunged in its entirety from the claims register.
3. Each No Basis Consumer Creditor 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 Consumer Creditor 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, Consumer Representative, 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: _____, 2020
New York, New York

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

Exhibit 1

No Basis Consumer Creditor Claims