

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF THE TWENTY-THIRD 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.**<sup>1</sup> : **(Jointly Administered)**  
:  
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**NOTICE OF HEARING ON TWENTY-THIRD 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 Consumer Representative filed the *Twenty-Third Omnibus Objection to Proofs of Claim (No Basis*

<sup>1</sup> 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 Claims*) (the “**Objection**”) with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).<sup>2</sup>

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.<sup>3</sup> **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.

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

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<sup>2</sup> 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.

<sup>3</sup> Claimants will be served an individualized notice regarding their Proof(s) of Claim that are being objected to in the Objection.

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](http://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**

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	:	
<b>In re</b>	:	<b>Chapter 11</b>
	:	
<b>DITECH HOLDING CORPORATION, et al.,</b>	:	<b>Case No. 19-10412 (JLG)</b>
	:	
<b>Debtors.<sup>1</sup></b>	:	<b>(Jointly Administered)</b>
	:	
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**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**”).<sup>2</sup>

**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**”) <sup>3</sup> is properly filed and served.

<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> 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)

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*

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

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	:	
<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>
	:	
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**TWENTY-THIRD 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.**

<sup>1</sup> 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,<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**”), 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).

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<sup>2</sup> 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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22428</b>	Ditech Holding Corporation				
JONES, RHONDA M			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/17/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
261 ROBIN DRIVE							
SAUK VILLAGE, IL 60411							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>21004</b>	Ditech Holding Corporation				
JONES, ROBERT			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	4/24/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1 FOXCROFT LANE							
PINE BLUFF, AR 71603							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22886</b>	Ditech Holding Corporation				
JONES, ROBERT			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/28/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1239 BROOME DR							
UTICA, MS 39175							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>2775</b>	Ditech Financial LLC				
JOSEPH, OCEAN			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	11/13/2019	<b>Reason for Objection:</b>	Claim determined to have no merit based on Company review.			
395 NE 88 ST							
MIAMI, FL 33138							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22124</b>	Ditech Holding Corporation				
JUNIEL, DENNIS J			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/13/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
233 NORTH ELM STREET							
BEARDEN, AR 71720							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24181</b>	Ditech Holding Corporation	\$0.00	\$500.00	\$500.00	\$0.00
KADDOUH, IBRAHIM							\$500.00
	<b>Filed On:</b>	10/2/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
37961 BRADLEY DR							
FARMINGTON HILLS, MI 48335							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22321</b>	Ditech Holding Corporation				
KAMINS, MATTHEW			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/15/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1 KELLEY SQ STE 13 WORCESTER, MA 01610							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>23061</b>	Ditech Holding Corporation				
KANG, LILOA DM			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/30/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
C/O JULIA KANG 73-4206 KIEKIE ST KAILUA KONA, HI 96740							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22829</b>	Ditech Holding Corporation				
KAPIT, MARLENE			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/26/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
21413 TUMBLEWEED WAY SANTA CLARITA, CA 91350-2637							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24380</b>	Ditech Financial LLC				
KARIMAN, MEHDI			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	10/9/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
159 BIRCH CT							
BOWLING GREEN, KY 42101							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>21887</b>	Ditech Holding Corporation				
KAROUTSOS, JOHN C			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/11/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
897 SUNNINGDALE DR							
GROSSE POINTE WOODS, MI 48236							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>20594</b>	Ditech Holding Corporation	\$0.00	\$0.00	\$2,000.00	\$0.00
KASSAY, LISA E SCHEID & JAMES J							\$2,000.00
	<b>Filed On:</b>	4/11/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
63 ADEN HILL ROAD							
PARKSVILLE, NY 12768							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>23709</b>					
KEITH, VASHTI		Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	6/3/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
108 SHELBY AVE AKRON, OH 44310							
<hr/>							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22761</b>					
KELLEHER, PATRICIA		Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/24/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
709 45TH ST E BRADENTON, FL 34208							
<hr/>							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22460</b>					
KELLY, BETTY		Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/17/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1051 N OLD CANTON RD CANTON, MS 39046							
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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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>21955</b>	Ditech Holding Corporation				
KELLY, JAMES			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/12/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1722 CLARK LAKE RD BRIGHTON, MI 48114							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22561</b>	Ditech Holding Corporation				
KELLY, KEVIN J / SHARON J			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/20/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
8764 HORSESHOE LN CHITTENANGO, NY 13037							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22077</b>	Ditech Holding Corporation				
KENDALL, PAMELA			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/13/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1145 TRAVIS BOYD RD MANSFIELD, 38236							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>23654</b>	Ditech Holding Corporation				
KENDRICK, JACQUELINE			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	6/3/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
408 NORTH LAKE DR.							
PERRY, GA 31069							
<hr/>							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22633</b>	Reverse Mortgage Solutions, Inc.	\$100.00	\$0.00	\$0.00	\$100.00
KENNETH R HOWELL/DEBORAH S LAMBERT							
	<b>Filed On:</b>	5/21/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
317 COUNTY ROAD 1418							
QUITMAN, TX 75783							
<hr/>							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>2621</b>	Ditech Holding Corporation				
KEY, GERALDINE			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	11/7/2019	<b>Reason for Objection:</b>	Claim determined to have no merit based on Company review.			
105 DALEVIEW AVE							
GALLATIN, TN 37066							
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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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>23870</b>	Ditech Holding Corporation				
KEYS, ANASTASIA			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	6/5/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
7361 E CASITAS DEL RIO DR SCOTTSDALE, AZ 85255-4994							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>20805</b>	Ditech Holding Corporation				
KILBURN, SUSAN			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	4/20/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
196 CROWN IMPERIAL ST HENDERSON, NV 89074							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>2822</b>	Ditech Holding Corporation				
KING, ANDY			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	11/18/2019	<b>Reason for Objection:</b>	Claim determined to have no merit based on Company review.			
1253 CUNNINGHAM DR, #2W CALUMET CITY, IL 60409							



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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>60226</b>	Ditech Holding Corporation				
KING, ANDY			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	11/11/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1253 CUNNINGHAM DR CALUMET CITY, IL 60409							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>60177</b>	Ditech Financial LLC	\$0.00	\$3,084.92	\$0.00	\$3,084.92
KING, DAVID							
	<b>Filed On:</b>	11/11/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
7879 US 701 N NEWTON GROVE, NC 28366							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>20818</b>	Ditech Holding Corporation	\$2,273.10	\$0.00	\$0.00	\$2,273.10
KING, KENNETH L							
	<b>Filed On:</b>	4/22/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
PO BOX 10567 445 CUMMINS STREET JACKSON, MS 39289							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24092</b>					
KING, VIRDELL		Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	8/26/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
15469 ASHTON DETROIT, MI 48223							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>60111</b>					
KINNEY, LISA G		Ditech Financial LLC	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	11/10/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
7700 CREEKBEND UNIT 68 HOUSTON, TX 77071							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22032</b>					
KINSELLA, JAMES & NANCY J		Green Tree Servicing Corp.	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/13/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
22437 CAROLINA ST ST CLAIR SHORES, MI 48080-3830							

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
<b>Creditor:</b> KLIMPEL, TERRI 131 AUTUMN TRAIL RED OAK, TX 75154	<b>Claim To Be Disallowed</b>  <b>Filed On:</b> 6/3/2019	<b>2052</b> Ditech Holding Corporation	\$0.00	\$0.00	\$925.00	\$0.00	\$925.00
			<b>Reason for Objection:</b>	Claim determined to have no merit based on Company review.			
<b>Creditor:</b> KLINE, DANIEL 118 OHLONE COURT LOS GATOS, CA 95032	<b>Claim To Be Disallowed</b>  <b>Filed On:</b> 5/11/2019	<b>21922</b> Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
			<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
<b>Creditor:</b> KNAPP, ROGER 408 COMMERCIAL ST FOREST CITY, MO 64451	<b>Claim To Be Disallowed</b>  <b>Filed On:</b> 5/16/2019	<b>22412</b> Ditech Holding Corporation	\$2,470.00	\$0.00	\$0.00	\$0.00	\$2,470.00
			<b>Reason for Objection:</b>	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
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<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24330</b>	Ditech Financial LLC	\$0.00	\$1,741.23	\$0.00	\$0.00	\$1,741.23
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KOCIS, STEPHEN J

**Filed On:** 10/8/2019**Reason for Objection:** Claim lacks sufficient documentation to support the validity of the claim6957 SPRING FARM CT  
CENTERVILLE, OH 45459

<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24196</b>	Ditech Holding Corporation	\$0.00	\$550.00	\$0.00	\$0.00	\$550.00
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KOEDEL, ELIZABETH D

**Filed On:** 10/3/2019**Reason for Objection:** Claim lacks sufficient documentation to support the validity of the claim58313 SUMMER CHASE DRIVE  
ELKHART, IN 46517

<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22398</b>	Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
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KOLLIAS, CHRISTIAN

**Filed On:** 5/16/2019**Reason for Objection:** Claim lacks sufficient documentation to support the validity of the claim42 CHERRY LANE  
OAKDALE, CT 06370

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>21962</b>	Ditech Financial LLC				
KOMAREK, RENATA			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/12/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1350 ALAMEDA DE LAS PULGAS SAN CARLOS, CA 94070							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>60120</b>	Ditech Financial LLC	\$0.00	\$4,229.85	\$0.00	\$4,229.85
KONDURI, SIVAKUMAR & VANAJA							
	<b>Filed On:</b>	11/10/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
2603 CAPEWALK DR HOUSTON, TX 77054							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22177</b>	Ditech Financial LLC	\$3,106.00	\$0.00	\$0.00	\$3,106.00
KRENEK, LEONARD							
	<b>Filed On:</b>	5/14/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
2034 GREY FALCON CIRCLE SW VERO BEACH, FL 32962							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24476</b>					
KROZEL, JOHN JR		Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	10/19/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
421 N CATALPA AVE							
WOOD DALE, IL 60191							
<hr/>							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22718</b>					
KUBICA, CATHERINE		Green Tree Credit LLC	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/23/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
7 PINE ST							
ILION, NY 13357							
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<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>21931</b>					
KUYKENDALL, STEPHEN		Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/11/2019	<b>Reason for Objection:</b>	Claim determined to have no merit based on Company review.			
7830 AGATE DR SW							
LAKEWOOD, WA 98498							
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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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>21477</b>	Ditech Holding Corporation				
LABOILE, CYNTHIA			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	4/25/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
2810 MARBLE CEDARS DR COLUMBIA, MO 65203							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>387</b>	Ditech Holding Corporation	\$0.00	\$0.00	\$0.00	\$95,521.09
LABUSKI-BROWN, LOU							\$95,521.09
	<b>Filed On:</b>	3/21/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
107 PUTNAM WAY MECHANICSBURG, PA 17050							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>21664</b>	Ditech Holding Corporation				
LACAVA, CHRISTOPHER J			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/8/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
124 WORTH RD BAYVILLE, NJ 08721							

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
<b>Creditor:</b>  LADD, WILLIAM  108 COUNTRY TRACE CT ST PETERS, MO 63304	<b>Claim To Be Disallowed</b>  <b>Filed On:</b> 5/14/2019	<b>22175</b>  Ditech Financial LLC	\$0.00	\$453.74	\$0.00	\$0.00	\$453.74
<b>Reason for Objection:</b> Claim lacks sufficient documentation to support the validity of the claim							
<b>Creditor:</b>  LANNI, NATHAN  4207 CALIFORNIA AVE NORCO, CA 92860	<b>Claim To Be Disallowed</b>  <b>Filed On:</b> 6/3/2019	<b>23780</b>  Ditech Holding Corporation	\$0.50	\$0.00	\$0.00	\$0.05	\$0.55
<b>Reason for Objection:</b> Claim lacks sufficient documentation to support the validity of the claim							
<b>Creditor:</b>  LASPISA, JAMES C  467 E JEFFREY PL COLUMBUS, OH 43214	<b>Claim To Be Disallowed</b>  <b>Filed On:</b> 5/10/2019	<b>21842</b>  Reverse Mortgage Solutions, Inc.	\$100.00	\$0.00	\$0.00	\$374.11	\$474.11
<b>Reason for Objection:</b> 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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>23927</b>	Ditech Financial LLC				
LAWRENCE, DEATRA			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	6/13/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
5145 GRAND PINES DRIVE MEMPHIS, TN 38125							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>23957</b>	Green Tree Servicing Corp.	\$0.00	\$0.00	\$5,000.00	\$0.00 \$5,000.00
LAWRENCE, WILLIAM S							
	<b>Filed On:</b>	6/19/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
37 SNOW POND RD CONCORD, NH 03301							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22539</b>	Ditech Holding Corporation				
LAYMANANCE, BOBBY, SR			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/20/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
PO BOX 268 WARTBURG, 37887							

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
<b>Creditor:</b> LEDESMA, ALMA 3122 STOWMARKET AVE. ROCKFORD, IL 61109	<b>Claim To Be Disallowed</b>  <b>Filed On:</b> 6/4/2019	<b>23824</b> Ditech Financial LLC	\$0.00	\$0.00	\$0.00	\$6,343.93	\$6,343.93
<b>Reason for Objection:</b> Claim lacks sufficient documentation to support the validity of the claim							
<b>Creditor:</b> LEE, JOHN E, JR 1835 FLORIDA CLUB CIRCLE APT 3310 NAPLES, FL 34112	<b>Claim To Be Disallowed</b>  <b>Filed On:</b> 4/9/2019	<b>20522</b> Ditech Holding Corporation	\$0.00	\$0.00	\$1,036.07	\$63,922.06	\$64,958.13
<b>Reason for Objection:</b> Claim lacks sufficient documentation to support the validity of the claim							
<b>Creditor:</b> LEFRANCOIS, NORMAN 1051 ELLESMERE WAY OAK PARK, CA 91377	<b>Claim To Be Disallowed</b>  <b>Filed On:</b> 5/29/2019	<b>22947</b> Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
<b>Reason for Objection:</b> 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
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<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22056</b>	Ditech Financial LLC	\$1,000.00	\$2,000.00	\$2,000.00	\$1,000.00	\$6,000.00
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LEITENBAUER, JONY

**Filed On:** 5/13/2019**Reason for Objection:** Claim lacks sufficient documentation to support the validity of the claim

1702 COCONUT DR

FORT PIERCE, FL 34949

<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22902</b>	Reverse Mortgage Solutions, Inc.	\$137.00	\$0.00	\$0.00	\$0.00	\$137.00
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LEITNER, ALANNA

**Filed On:** 5/28/2019**Reason for Objection:** Claim determined to have no merit based on Company review.

PO BOX 23

MILLVILLE, NJ 08332-0023

<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24129</b>	Ditech Financial LLC	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
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LELIO, BRIAN

**Filed On:** 10/1/2019**Reason for Objection:** Claim lacks sufficient documentation to support the validity of the claim

11 GANNETT WAY

HOPEDALE, MA 01747

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22172</b>	Ditech Holding Corporation				
LENH, PHI SAU			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/14/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
8017 36TH AVE SACRAMENTO, CA 95824							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>60029</b>	Ditech Financial LLC	\$0.00	\$250.00	\$0.00	\$250.00
LEUNG, WINGKAY							
	<b>Filed On:</b>	11/7/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
8 POWERS ROAD ANDOVER, MA 01810							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>20842</b>	Ditech Holding Corporation	\$0.00	\$0.00	\$2,321.82	\$2,321.82
LEVY, SUSAN I							
	<b>Filed On:</b>	4/22/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
C/O LAW OFFICE OF NEAL S ZASLAVSKY APC ATTN NEAL S ZASLAVSKY, ESQ 8335 SUNSET BLVD, STE 202 WEST HOLLYWOOD, CA 90069							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>20511</b>	Ditech Holding Corporation				
LEW, MICHAEL T & SUSIE S			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	4/8/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
PO BOX 176							
SAN GABRIEL, CA 91778							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24342</b>	Ditech Financial LLC				
LEWIS, DEELORIS P			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	10/8/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
5205 TAYLOR LN							
BESSEMER, AL 35022							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22470</b>	Ditech Financial LLC				
LI, YUE			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/18/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
11455 RUSTIC ROCK DR							
AUSTIN, TX 78750							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22067</b>	Ditech Holding Corporation				
LIBERATORE, SERGIO			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/13/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
114 MAJESTIC DR DIXHILLS, NY 11746							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>1029</b>	Ditech Holding Corporation				
LINGELBACH, CHERIE G			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	4/17/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
2208 MATTERHORN CT WEST LINN, OR 97068							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22026</b>	Ditech Holding Corporation				
LISSETH CAROLINA RIVERA MORALES			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/13/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1694 YORKTOWN COURT CROFTON, MD 21114							

## Exhibit

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22762</b>	Ditech Financial LLC				
LITSON, ALICE			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/24/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
PO BOX A052							
TSAILE, AZ 86556							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24291</b>	Ditech Holding Corporation				
LOAN SERVICING CENTER			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	10/5/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
5747 S 21ST TERR							
PHOENIX, AZ 85040							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22469</b>	Reverse Mortgage Solutions, Inc.				
LOCKHART, JOYCE			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/17/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1410 BLAKE ST							
BERKELEY, CA 94702							

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
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<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>60211</b>	Ditech Financial LLC	\$0.00	\$600.00	\$0.00	\$0.00	\$600.00
LOMAN, GLORIA								
	<b>Filed On:</b>	11/11/2019		<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
3904 REMINGTON AVE								
PENNSAUKEN, NJ 08110								

<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>23509</b>	Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
LOPEZ, JORGE								
	<b>Filed On:</b>	6/3/2019		<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
11255 FINEVIEW STREET								
EL MONTE, CA 91733								

<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>20524</b>	Ditech Holding Corporation	\$1,150.28	\$0.00	\$0.00	\$259,355.23	\$1,150.28
LOTT, JAMES R, JR								
	<b>Filed On:</b>	4/9/2019		<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1401 E GAIL DR								
CHANDLER, AZ 85225								



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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>60142</b>					
LUCKEY, MARIE		Green Tree Servicing Corp.	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	11/11/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
738 STANLEY AVE, APT 1F BROOKLYN, NY 11207							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>2668</b>					
LUCKEY, SANDRA L		Ditech Holding Corporation	\$0.00	\$3,000.00	\$0.00	\$0.00	\$3,000.00
	<b>Filed On:</b>	11/9/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
901 MATHIS ST SUMTER, SC 29150							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24556</b>					
LUEY, SCOTT		Ditech Holding Corporation	\$0.00	\$2,447.18	\$0.00	\$0.00	\$2,447.18
	<b>Filed On:</b>	10/30/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
2 DEER RUN DR BALLSTON SPA, NY 12020							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22091</b>					
LUONG, JENNY		Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/13/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
8714 WHITEHOUSE ROAD ELK GROVE, CA 95758							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>20492</b>					
LUSTINA, ALEXANDER		Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	4/8/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
23444 MONETA AVE CARSON, CA 90745							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24258</b>	\$0.00	\$5,000.00	\$0.00	\$0.00	\$5,000.00
LY, TOAN		Ditech Holding Corporation					
	<b>Filed On:</b>	10/4/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
5448 S ANDRAE DR NEW BERLIN, WI 53151							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>20462</b>	Ditech Financial LLC				
LYNCH, SHAWN			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	4/7/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
2100 E. ELLIOT RD BLDG 94 TEMPE, AZ 85284							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22030</b>	Ditech Holding Corporation	\$100.00	\$0.00	\$0.00	\$100.00
MACALI, NEIL							
	<b>Filed On:</b>	5/13/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1003 SOUTH MILLS AVE ORLANDO, FL 32806							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>2390</b>	Ditech Holding Corporation	\$0.00	\$0.00	\$0.00	\$25,038.00
MACK, DONNIE RAY							
	<b>Filed On:</b>	8/5/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
141 MAMA MACK RD PINOLA, MS 39149							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>21862</b>	Ditech Holding Corporation				
MALDONADO, ELIAS			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/10/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1576 CORBIN AVENUE 2ND FL NEW BRITAIN, CT 06053							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22950</b>	Ditech Holding Corporation				
MALONE, MORRIS			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/29/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
PO BOX 264 SENATOBIA, MS 38668							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22443</b>	Ditech Holding Corporation				
MANCINI, REGINA			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/17/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
201 THOMAS LN S NEWARK, DE 19711							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>21620</b>	Ditech Financial LLC				
MANGRUM, JACQUELINE K			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/7/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
PO BOX 343							
LAWRENCEVILLE, VA 23868							
<hr/>							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24484</b>	Ditech Financial LLC	\$1,200.00	\$0.00	\$0.00	\$1,200.00
MANGUM, MELINDA							
	<b>Filed On:</b>	10/20/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
2900 SABINA CT							
LIVE OAK, CA 95953							
<hr/>							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>20959</b>	Ditech Holding Corporation				
MANNING, ULYSSES			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	4/23/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1513 QUEEN STREET							
VALDOSTA, GA 31601							
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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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>21721</b>	Ditech Holding Corporation				
MARBLE, STEVE			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/8/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
7992 BRAND UNA RD PRAIRIE, MS 39756							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>60014</b>	Ditech Financial LLC				
MARCO, JUMAR			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	11/7/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
4430N N NATCHEZ AVE HARWOOD HTS, IL 60706							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>60015</b>	Ditech Financial LLC				
MARCO, JUMAR			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	11/7/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
4430N N NATCHEZ AVE HARWOOD HTS, IL 60706							

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
<b>Creditor:</b> MARCO, NEIL  966 RIDGEWOOD BLVD EAST TOWNSHIP OF WASHINGTON, NJ 07676	<b>Claim To Be Disallowed</b>  <b>Filed On:</b> 4/8/2019	<b>20494</b> Ditech Holding Corporation	\$0.00	\$0.00	\$0.00	\$341,688.71	\$341,688.71
			<b>Reason for Objection:</b> Claim lacks sufficient documentation to support the validity of the claim				

<b>Creditor:</b> MARGARET MURRAY & BRUCE FLEMING  739 GOVERNOR BRIDGE RD DAVIDSONVILLE, MD 21035-1713	<b>Claim To Be Disallowed</b>  <b>Filed On:</b> 4/11/2019	<b>912</b> Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
			<b>Reason for Objection:</b> Claim lacks sufficient documentation to support the validity of the claim				

<b>Creditor:</b> MARIETTA, DAWN  3232 CARROLL COURT BENSALEM, PA 19020	<b>Claim To Be Disallowed</b>  <b>Filed On:</b> 4/7/2019	<b>20455</b> Ditech Financial LLC	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
			<b>Reason for Objection:</b> 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:	Claim To Be Disallowed	22413	Ditech Holding Corporation	\$0.00	\$0.00	\$1,401.48	\$0.00	\$1,401.48
MARQUEZ, MARIA								
	Filed On:	5/16/2019		Reason for Objection:	Claim lacks sufficient documentation to support the validity of the claim			
31 GREEN LEVEL DR								
ANGIER, NC 27501								

<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>20873</b>	Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
MARSHALL, JESSIKA BRYANT	<b>Filed On:</b>	4/23/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim				
6737 DEER FOOT DR PINSON, AL 35126								

<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>60225</b>	Ditech Financial LLC	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
MARSHALL, JOHN	<b>Filed On:</b>	11/11/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim				
215 FIRE BOX DR FELTON, DE 19943-6900								



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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22114</b>	Ditech Holding Corporation				
MARTIN, DIANA			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/13/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
1640 5TH STREET GERING, NE 69341							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>22740</b>	Ditech Holding Corporation				
MARTINEZ, MARTHA			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	5/23/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
14596 PADDOCK STREET SYLMAR, CA 91342							
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>24017</b>	Ditech Holding Corporation				
MARTINEZ, YOLANDA			Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	7/18/2019	<b>Reason for Objection:</b>	Claim lacks sufficient documentation to support the validity of the claim			
5963 PLEASANT LAKE SAN ANTONIO, TX 78222							

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
<b>Creditor:</b>	<b>Claim To Be Disallowed</b>	<b>23928</b>					
MATASK, SHAWNEEN		Ditech Holding Corporation	Unliquidated	Unliquidated	Unliquidated	Unliquidated	Unliquidated
	<b>Filed On:</b>	6/13/2019	<b>Reason for Objection:</b> Claim lacks sufficient documentation to support the validity of the claim				
124 MIRON AVENUE							
WEIRTON, WV 26062							

<b>Claims To Be Disallowed Totals</b>	<b>100</b>	<b>\$11,636.88</b>	<b>\$23,856.92</b>	<b>\$15,184.37</b>	<b>\$793,243.18</b>	<b>\$584,066.12</b>
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**Exhibit B**

**Proposed Order**

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

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

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

Upon the *Twenty-Third Omnibus Objection to Proofs of Claim (No Basis Consumer Creditor Claims)*, filed on January 17, 2020 (the “**Objection**”),<sup>2</sup> 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

<sup>1</sup> 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.

<sup>2</sup> 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

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

**Exhibit 1**

**No Basis Consumer Creditor Claims**