

This Objection seeks to disallow and expunge certain Proofs of Claim.

You should locate your name and claims on Exhibit A attached to this Objection.

If you *do not* oppose the disallowance of your claim, you *do not* need to file a written response, and you do not need to appear for the hearing. If you *do* oppose the disallowance of your claim, you *must* file a written response to the Objection as provided below.

If the Bankruptcy Court disallows your claim you, will not be
entitled to any money based on the claim.

**IF YOU HAVE QUESTIONS, PLEASE CONTACT THE OFFICE OF THE CONSUMER CLAIMS TRUSTEE
AT INFO@DITECH-SETTLEMENT.COM OR 877-783-6297**

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New York, NY 10022
Telephone: (212) 891-1600
Facsimile: (212) 891-1699
Richard Levin
rlevin@jenner.com

Attorneys for the Consumer Claims Trustee

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

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

NOTICE OF HEARING

**CONSUMER CLAIMS TRUSTEE'S ELEVENTH OMNIBUS OBJECTION TO PROOFS OF
CLAIM (INSUFFICIENT DOCUMENTATION UNSECURED CONSUMER CREDITOR CLAIMS)**

¹ 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.

On March 13, 2020, the Consumer Claims Trustee filed the attached *Consumer Claims Trustee's Eleventh Omnibus Objection to Proofs of Claims—Insufficient Documentation Unsecured Consumer Creditor Claims* (the “**Objection**”), which seeks to disallow proofs of claim listed on Exhibit A to the Objection that do not contain sufficient information or documentation to establish their underlying merits. The Objection asks the Bankruptcy Court to disallow the claims listed on Exhibit A because the claims do not provide sufficient documentation to support them. Recipients of this Notice should locate their name and claims on Exhibit A.

If you *do not* oppose the disallowance of your claim, you do not need to file a written response to the Objection or appear for the hearing. The Court will disallow your claim, and you will not be entitled to any money on account of your claim.

If you *do* oppose the disallowance of your claim, **you must file a written response to the Objection. If you do not respond to this Notice, the court may disallow your claim without further notice or hearing.**

The Court has ordered that certain procedures—the “**Claims Hearing Procedures**”—apply to this Objection and to any Response you file. A copy of the Claims Hearing Procedures is Attachment 1 to this Notice. The Claims Hearing Procedures impose deadlines for action. Failure to comply with the Claim Hearing Procedures may result in the disallowance of your claim without further notice. Please review them carefully if you oppose disallowance of your claim.

Among other things, the Claims Hearing Procedures require that you file with the Bankruptcy Court and send a copy of your response so that it is received by **April 10, 2020** to:

- (1) Consumer Claims Trustee, Tara Twomey, Ditech Consumer Recovery Trust, c/o Settlement Administrator, PO Box 1607, Blue Bell, PA 19422;
- (2) The chambers of the Honorable James L. Garrity, Jr., United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004.

The Claims Hearing Procedures also require that every response to the Objection contain the following:

- a. a caption identifying the court (U.S. Bankruptcy Court for the Southern District of New York), the Debtor (Ditech Holding Corporation, et al), the case number (19-10412); and the document to which the response is directed (Consumer Claim Trustee's Eleventh Omnibus Objection to Proofs of Claim);
- b. the name of the claimant and a description of the basis for the claim;
- c. a statement describing why the claim should not be disallowed, including the specific factual and legal bases upon which the claimant will rely in opposing the Objection;
- d. all documentation or other evidence upon which claimant will rely in opposing the Objection, excluding documentation provided with the original Proof of Claim; and
- e. the name, address, telephone number and email of the person (which may be the claimant or the claimant's legal representative) who will have the ultimate authority to settle or otherwise resolve the Claim on behalf of the claimant.

A HEARING ON THE OBJECTIONS will be held on April 22, 2020 at 11:00 a.m. EDT in the United States Bankruptcy Court, One Bowling Green, Room 601, New York, New York 10004. The Claims Hearing Procedures govern the procedures at the hearing. If you file a written response to the Objection, you should plan to appear at that hearing, unless the Consumer Claims Trustee notifies you that the hearing will be postponed to a later date. You

may participate in the hearing telephonically by complying with the Court's instructions (including providing prior written notice to the attorneys for the Consumer Claims Trustee), which can be found on the Court's website at www.nysb.uscourts.gov.

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

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Attorneys for Consumer Claims Trustee

Attachment 1

COURT-ORDERED CLAIM HEARING PROCEDURES

The claim hearing procedures (the “**Claim Hearing Procedures**”) 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 and its affiliates (each, a “**Debtor**”).¹

Claim Hearing Procedures

1. Under the Court’s “**Case Management Order**” (*Order Implementing Certain Notice and Case Management Procedures*, dated March 19, 2019 (ECF No. 211)), the Court established periodic hearings in these cases and required the Plan Administrator (which term includes the Consumer Claims Trustee), on behalf of the Wind Down Estates, to schedule response deadlines for claims objections to be heard at the hearings the Plan Administrator schedules with the Court.
2. If a claimant properly files and serves a response to an objection, the Plan Administrator will schedule a hearing (a “**Claim Hearing**”) to consider the claim (a “**Contested Claim**”), the objection, and the response as follows:
 - (a) If the objection asserts that the Contested Claim fails to state a legal basis for a claim against the Debtor, that the Plan Administrator does not intend to introduce evidence in support of the objection, that is, that the Contested Claim should be dismissed under Bankruptcy Rule 7012, the hearing (a “**Sufficiency Hearing**”), will go forward at the date stated in the Notice Of Hearing to which this Attachment 1 is attached. 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) If the Plan Administrator instead intends to proceed with an evidentiary hearing on the merits of a Contested Claim (a “**Merits Hearing**”), the Plan Administrator must serve upon the relevant Claimant, by email or overnight delivery and file with the

¹ Capitalized terms used but not otherwise defined in this Attachment 1 shall have the meanings assigned to those 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, which are available at <https://dm.epiq11.com/case/ditech>.

Court, a notice (a “**Notice of Merits Hearing**”) substantially in the form attached as Exhibit 2 to the Order establishing these Claims Hearing Procedures, at least 30 calendar days before the date of the Merits Hearing. The rules and procedures applicable to a Merits Hearing will be set forth in any scheduling order issued by the Court in connection with the Merits Hearing.

3. 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 Claimant a Notice of Merits Hearing with respect to the Contested Claim.
4. The Plan Administrator may file and serve a reply (a “**Reply**”) to a Response no later than 4:00 p.m. EDT on the day that is at least five business days before the date of the hearing.
5. The Plan Administrator, in its sole discretion, may postpone a hearing scheduled in accordance with these Claims Hearing Procedures at any time by providing notice to the Court and the Claimant.
6. The Court will consider appropriate sanctions, including allowance or disallowance of the Contested Claim, if either party does not follow the Claim Hearing Procedures.

This Objection seeks to disallow and expunge certain Proofs of Claim.

You should locate your name and claims on Exhibit A attached to this Objection.

If you *do not* oppose the disallowance of your claim, you *do not* need to file a written response, and you do not need to appear for the hearing. If you *do* oppose the disallowance of your claim, you *must* file a written response to the Objection as provided in the Notice of Objection.

If the Bankruptcy Court disallows your claim you, will not be
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**UNITED STATES BANKRUPTCY COURT
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DITECH HOLDING CORPORATION, <i>et al.</i> ,	:	Case No. 19-10412 (JLG)
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**CONSUMER CLAIMS TRUSTEE'S ELEVENTH OMNIBUS OBJECTION TO PROOFS OF CLAIM
(INSUFFICIENT DOCUMENTATION UNSECURED CONSUMER CREDITOR CLAIMS)**

¹ 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.

The Consumer Claims Trustee (“**Trustee**”), on behalf of the Consumer Creditor Recovery Trust (“**Trust**”) established under the confirmed Plan, respectfully represents as follows in support of this omnibus objection (the “**Objection**”):

BACKGROUND

1. On February 11, 2019, Ditech Holding Corporation 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 chapter 11 cases are being jointly administered for procedural purposes only under Rule 1015(b) of the Federal Rules of Bankruptcy Procedure. On September 26, 2019, the Court confirmed the Third Amended Plan, under which the Debtors sold their forward and reverse mortgage businesses to the Forward Buyer and Reverse Buyer, respectively. 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).

JURISDICTION

2. This Court has jurisdiction to consider this matter under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409.

RELIEF REQUESTED

3. The Trustee files this Objection under the Claims Procedures Order seeking entry of an order disallowing the Insufficient Documentation Unsecured Consumer Claims listed on the attached Exhibit A.

4. The Trustee, with the assistance of her professionals, examined the proofs of claim identified on Exhibit A (the “**Insufficient Documentation Unsecured Consumer Creditor Claims**”), documentation provided with respect to each claim, and, as needed, the Debtors’ respective books and records. Each of these claims is asserted as a general unsecured claim. The Trustee has determined in each case that the proofs of claim contain insufficient information and/or documentation to establish their underlying merits.

5. The Trustee expressly reserves all rights to object on any other basis to any Insufficient Documentation Unsecured Consumer Creditor Claims as to which the Court does not grant the relief requested in this Objection.

**THE INSUFFICIENT DOCUMENTATION UNSECURED CONSUMER CREDITOR
CLAIMS SHOULD BE DISALLOWED**

6. 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 Motors Liquidation Co.*, 2012 WL 1886755, at *3 (S.D.N.Y. 2012).

7. 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).

8. Based upon a review of the proofs of claim filed on the Claims Register, the Trustee determined that the Insufficient Documentation Unsecured Consumer Creditor Claims are claims that should be disallowed because they lack sufficient information or documentation to substantiate the claim. Accordingly, these proofs of claim do not present valid prepetition claims against the Debtors. If the Insufficient Documentation Unsecured Consumer Creditor Claims are not disallowed, then the parties who filed these proofs of claim may potentially receive an improper recovery to the detriment of the Trust’s beneficiaries.

9. Therefore, to avoid the possibility that the claimants at issue receive improper recoveries against the Trust, and to ensure that the Trust's beneficiaries are not prejudiced by such improper recoveries, the Trust requests that the Court disallow in their entirety each of the Insufficient Documentation Unsecured Consumer Creditor Claims.

SEPARATE CONTESTED MATTERS.

10. To the extent a claimant files a Response regarding any Insufficient Documentation Unsecured Consumer Creditor Claim and the Trustee is unable to resolve the Response, the Objection 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 Insufficient Documentation Unsecured Consumer Creditor Claim.

RESERVATION OF RIGHTS.

11. The rights of the Trustee to (i) file subsequent objections to any Insufficient Documentation Unsecured Consumer Unsecured Creditor Claim on any ground to the extent there are surviving claims; (ii) amend, modify, or supplement this Objection including, without limitation, the filing of objections to further amended or newly-filed claims; (iii) seek to disallow or reduce any claim to the extent all or a portion of such claim has been paid; and (iv) settle any claim for less than the asserted amount are fully reserved. Separate notice and a hearing will be provided in connection with any such additional objections.

NO PRIOR REQUEST.

12. No previous request for the relief sought herein with respect to the Insufficient Documentation Unsecured Consumer Creditor Claims has been made by the Trustee to this or any other court.

WHEREFORE the Trustee respectfully requests entry of the Proposed Order granting the relief requested herein and such other and further relief as is just.

/s/ Richard Levin
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New York, NY 10022
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Attorneys for Consumer Claims Trustee

Exhibit A

Consumer Claims Trustee's Eleventh Omnibus Objection to Proofs of Claim
(Insufficient Documentation Unsecured Consumer Creditor Claims)

Creditor	Claim Number	Total Claim Amount
Abawi, George Pleasant View, UT	20437	\$1,153.91
Agostino, John & Barbara Brooklyn, NY	22615	\$0.00
Avila, Jose Manuel Garden Grove, CA	22577	\$0.00
Bains, Sukhminder Antioch, CA	22821	\$0.00
Barr, Charles Deerfield Beach, FL	1816	\$14,681.00
Bell, Veronica Kansas City, MO	22565	\$0.00
Blakeley, Elida Perris, CA	22835	\$300,000.00
Brent, Harold Lee, Jr Columbus, GA	22651	\$0.00
Bullocks, Paula Brown Deer, WI	22623	\$0.00
Bunn, Kevin Cary, NC	20984	\$0.00
Cassada, Willie Midlothian, VA	22547	\$0.00
Chaney, Leroy Butler, AL	1803	\$0.00
Chapter 13 Trustee MDAL Montgomery, AL	777	\$1.00
Chapter 13 Trustee MDAL Montgomery, AL	778	\$1.00
Chapter 13 Trustee MDAL Montgomery, AL	779	\$1.00
Chapter 13 Trustee MDAL Montgomery, AL	780	\$1.00
Chapter 13 Trustee MDAL Montgomery, AL	781	\$1.00
Chapter 13 Trustee MDAL Montgomery, AL	782	\$1.00
Chapter 13 Trustee MDAL Montgomery, AL	783	\$1.00
Clemons, John Rancho Cucamonga, CA	22700	\$0.00

Exhibit A

Consumer Claims Trustee's Eleventh Omnibus Objection to Proofs of Claim
(Insufficient Documentation Unsecured Consumer Creditor Claims)

Creditor	Claim Number	Total Claim Amount
Connor, Janet A Mount Ephraim, NJ	21639	\$0.00
Cotogno, Mary Tinton Falls, NJ	21645	\$0.00
Cowans, Martha Olive Branch, MS	22572	\$0.00
Czaja, Harriet Hammond, IN	22766	\$0.00
Davenport, Fred, Jr Chicago, IL	22584	\$0.00
David Kaufman & Elizabeth Jacobson Santa Fe, NM	22777	\$0.00
Davis, Kenneth Glen Burnie, MD	21662	\$0.00
Defalco, Joel Shelby Township, MI	22575	\$0.00
Dillman, Douglas Glendale, AZ	22806	\$0.00
Dye, Rolanda Ocala, FL	22680	\$0.00
Edwards, Braynon Homestead, FL	22624	\$0.00
Enriquez, Diana San Juan, TX	22665	\$0.00
Enriquez, Ruben H San Juan, TX	22668	\$0.00
Estate of Brenda Stubbs, The Norton, VA	22645	\$200.00
Evans, Harold L Sicklerville, NJ	22852	\$6,000.00
Fizzolio, Michael Lancaster, CA	22563	\$15,000.00
Fogwell, Sarah Cincinnati, OH	22646	\$0.00
Foster, Wilbur Miami, FL	22559	\$0.00
Frank, Carey Renton, WA	21638	\$0.00

Exhibit A

Consumer Claims Trustee's Eleventh Omnibus Objection to Proofs of Claim
(Insufficient Documentation Unsecured Consumer Creditor Claims)

Creditor	Claim Number	Total Claim Amount
Garcia, Melissa El Paso, TX	22543	\$0.00
Gardner, Marlene Silver Springs, FL	22731	\$0.00
Garner, Seander Cleveland, OH	22157	\$0.00
Gonzalez, Florence Islip Terrace, NY	22617	\$0.00
Harris, Miriame Celebration, FL	22606	\$0.00
Hartsfield, Naomi Zebulon, NC	22666	\$0.00
Herbert, Benjamin Grand Rapids, MI	22849	\$0.00
Holt, Roger Perry, FL	22202	\$0.00
Holt, Roger Perry, FL	22205	\$0.00
Holt, Roger Perry, FL	22209	\$0.00
Jaster, Leonard J Bloomington, IL	22734	\$0.00
Johnson, Alfred & Barbara Musella, GA	20750	\$0.00
Jon Deleeuw And Kara Ceriello Seattle, WA	22650	\$0.00
Joseph, Earie Moss Point, MS	22848	\$0.00
Kaho, Clifton Washington, MS	22627	\$0.00
Kerr, Ken Norman, OK	22359	\$0.00
Keshishian, Missak & Zevart Concord, CA	22764	\$5,000.00
Kusal, Bhavin Irvine, CA	21701	\$0.00
Lewandowski, Jeffrey Jacksonville, FL	22719	\$0.00
Lopez, Ray Delhi, CA	22574	\$0.00

Exhibit A

**Consumer Claims Trustee's Eleventh Omnibus Objection to Proofs of Claim
(Insufficient Documentation Unsecured Consumer Creditor Claims)**

Creditor	Claim Number	Total Claim Amount
Lowell, Eric M & Lori L Brentwood, CA	22589	\$0.00
Lunsford, Tim Newark, OH	22573	\$20,000.00
Lynn, Barbara Lone Star, TX	22714	\$0.00
Mathews, Klinton Centralia, MO	23439	\$100,000.00
Mayo, Billie Sue Nampa, ID	21659	\$0.00
Mechigian, Gina Fresno, CA	22798	\$1,300.00
Miller, Careta L and Brock S Granger, TX	22810	\$0.00
Minor, Dustin and Angela Centralia, IL	22656	\$9,484.18
Morris, Darlene Ruther Glen, VA	22756	\$0.00
Mullady, Brian Union, MO	21658	\$0.00
Munz, Steven C Plymouth Meeting, PA	22827	\$3,114.86
Nowling, Michelle Hazlehurst, GA	22598	\$0.00
OBrien, Annie St. Clair Shores, MI	23893	\$0.00
Parker, Jacqueline W Mount Shasta, CA	22850	\$200.00
Pena, Jose West New York, NJ	22696	\$0.00
Promin, Joan G & Richard Edward Ocala, FL	22681	\$397,477.69
Ramos, Ricardo & Della Brownsville, TX	1394	\$10,394.56
Redmond, Henry West Columbia, SC	22732	\$0.00
Reed, Susan And Shawn Milford, CT	22705	\$0.00
Reyno, Jeannie Odessa, FL	22945	\$0.00

Exhibit A

Consumer Claims Trustee's Eleventh Omnibus Objection to Proofs of Claim
(Insufficient Documentation Unsecured Consumer Creditor Claims)

Creditor	Claim Number	Total Claim Amount
Reyno, Jeannie Odessa, FL	24250	\$0.00
Risser, Myron L & Mary L Elkhart, IN	22797	\$0.00
Robbins, Lisa Gaithersburg, MD	21995	\$1,110.34
Rolf Mitzkat and Stacey Marcum Georgetown, US	22716	\$0.00
Ruark, John D Middleburg, FL	22765	\$0.00
Sherwood, Roger W and Suzanne R New Orleans, LA	22457	\$2,917.47
Skala, George Rocklin, CA	22746	\$0.00
Smith, Christine Debary, FL	2082	\$3,120.79
Smith, Monique St Louis, MO	22581	\$0.00
Smith, Shannon M Monroe, LA	22612	\$0.00
Streeter, Tracy L and Rochelle D Indianapolis, IN	22389	\$0.00
Taylor, Gary Miami Gardens, FL	22670	\$0.00
Toney, Anthony D Troy, MI	22550	\$0.00
Turmel, Jane St Johnsbury Center, VT	22717	\$0.00
Ulmer, Rodney and Pamela Jamestown, NC	22687	\$0.00
Valencia, John A and Casandra L Rio Rancho, NM	22750	\$0.00
Ward, Gary Jonesborough, TN	1344	\$37,332.00
Washington, Laura Denise Fresno, TX	1034	\$100,000.00
Williams, Jacqueline Fresno, TX	22343	\$0.00
Williams, Jacqueline Fresno, TX	24509	\$0.00

Exhibit A

Consumer Claims Trustee's Eleventh Omnibus Objection to Proofs of Claim
(Insufficient Documentation Unsecured Consumer Creditor Claims)

Creditor	Claim Number	Total Claim Amount
Winiarz, Tracy Orlando, FL	22549	\$0.00

Exhibit B

Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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

**PROPOSED ORDER GRANTING CONSUMER CLAIMS TRUSTEE'S ELEVENTH
OMNIBUS OBJECTION TO PROOFS OF CLAIM (INSUFFICIENT
DOCUMENTATION UNSECURED CONSUMER CREDITOR CLAIMS)**

The Consumer Claims Trustee by the *Consumer Claims Trustee's Eleventh Omnibus Objection to Proofs of Claim (Insufficient Documentation Unsecured Consumer Creditor Claims)* filed on March 13, 2020 (the "**Objection**"),² seeks an entry of an order, under section 502(b) of the title 11 of the United States Code, Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order for approving procedures for the filing of omnibus objections to proofs of claim (the "**Claim Procedures Order**"), disallowing the Insufficient Documentation Unsecured Consumer

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 assigned to them in the Objection.

Creditor Claims on the basis that such claims fail to explain the basis for the claim or attach supporting documentation sufficient to support the claim. It appearing that this Court has jurisdiction to consider the Objection under 28 U.S.C. §§ 157 and 1334; that the relief requested is a core proceeding under 28 U.S.C. §157(b); that venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409; that due and proper notice of the Objection has been provided, and that such notice was adequate and appropriate under the circumstances such that no other or further notice need be provided; that the Objection complies with the Claim Procedures set forth in the Claim Procedures Order; the Court finds and determines that the relief sought in the Objection is in the best interest of the Debtors' estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein, and it is:

ORDERED that the relief requested in the Consumer Claims Trustee's Eleventh Omnibus Claims Objection is granted to the extent provided in this Order;

ORDERED that, under section 502(b) of the Bankruptcy Code, the claims listed on Exhibit A annexed hereto (collectively, the "**Insufficient Documentation Unsecured Consumer Creditor Claims**") are disallowed with prejudice;

ORDERED that Epiq Corporate Restructuring, LLC, the Debtors' claims and noticing agent, is directed to mark the Debtors' Claims Register to show the Insufficient Documentation Unsecured Consumer Creditor Claims listed on Exhibit A to this Order as disallowed and expunged so that such claims are no longer maintained on the Debtors' Claims Register;

ORDERED that the Trustee is authorized and empowered to take all actions as may be necessary and appropriate to implement the terms of this Order;

ORDERED that notice of the Consumer Claims Trustee's Eleventh Omnibus Claims Objection shall be deemed adequate and appropriate notice of such Objection, and the requirements of Bankruptcy Rule 3007(a), the Order Implementing Certain Notice and Case Management Procedures, entered March 19, 2019 (ECF No. 211), the Claims Procedures Order, and the Local Bankruptcy Rules of this Court are satisfied by such notice;

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of any claim not listed in Exhibit A, and the Trustee and any party in interest's rights to object on any basis is expressly reserved with respect to any such claim not listed on Exhibit A;

ORDERED that this Order shall be a final order with respect to each of the Insufficient Documentation Unsecured Consumer Creditor Claims identified on Exhibit A, as contemplated by Bankruptcy Rule 9014, as if each such Insufficient Documentation Unsecured Consumer Creditor Claim had been individually objected to;

ORDERED that any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall apply only to the contested matter that involves such claim 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;

ORDERED that the terms and conditions of this Order are effective immediately upon entry;

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2020
New York, New York

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