

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

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

**GEARY CLASS ACTION CLAIMANTS’ WAIVER AND RELEASE
OF RIGHTS PURSUANT TO APPROVED STIPULATION RESOLVING PROOF OF
CLAIM OF THE GEARY CLASS ACTION CLAIMANTS VIS-À-VIS THE GUC TRUST**

Now come Brian and Connie Geary (the “Gearys”) as the filers of the Geary Class Action Claim (“GCA Claim”) (Claim No. 20041) and provide this NOTICE to inform the Bankruptcy Court and all interested parties that they waive all rights and entitlements to further act under and/or receive distribution pursuant to the STIPULATION RESOLVING PROOF OF CLAIM OF THE GEARY CLASS ACTION CLAIMANTS VIS-À-VIS THE GUC TRUST (“GUC Trust Stipulation”). Notice of Presentment of the GUC Trust Stipulation was filed with the Bankruptcy Court and thereafter approved, respectively, on August 17, 2023 and September 15, 2023. ECF Nos. 4838 and 4877.

One condition of GUC Trust Stipulation was that no distribution would be made by the GUC Trust in the event the Bankruptcy Court entered an order declaring the entirety of the GCA

¹ The Debtors’ Third Amended Plan (as defined below) was confirmed, which created the Wind Down Estates. The Wind Down Estates, along with the last four digits of each of their federal tax identification number, as applicable, are Ditech Holding Corporation (0486); DF Insurance Agency LLC (6918); Ditech Financial LLC (5868); Green Tree Credit LLC (5864); Green Tree Credit Solutions LLC (1565); Green Tree Insurance Agency of Nevada, Inc. (7331); Green Tree Investment Holdings III LLC (1008); Green Tree Servicing Corp. (3552); Marix Servicing LLC (6101); Walter Management Holding Company LLC (9818); and Walter Reverse Acquisition LLC (8837). The Wind Down Estates’ principal offices are located at 1100 Virginia Drive, Suite 100, Fort Washington, Pennsylvania 19034.

Claim to be solely a Consumer Claim prior to the date of distribution.

Before the date of distribution by the GUC Trust, the Gearys entered into a separate Stipulation with the Consumer Claims Trustee (“CCT Stipulation”) which in material part treated the GCA Claim as a Consumer Claim. ECF No. 4922. On November 28, 2023, the Bankruptcy Court approved the CCT Stipulation.

Accordingly, the GUC Trust is under no further obligation to make a distribution pursuant to the GUC Trust Stipulation, and the Gearys hereby waive any rights or entitlements to receive such a distribution and release and discharge the GUC Trust and GUC Trustee from making such a distribution or further performing under the GUC Trust Stipulation.

Dated: December 18, 2023

NOBILE & THOMPSON CO., LPA

/s/ James E. Nobile

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FILED WITH PERMISSION BY:

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