## UNITED STATES OF AMERICA Before the CONSUMER FINANCIAL PROTECTION BUREAU

ADMINISTRATIVE PROCEEDING	ì
File No. 2014-CFPB-0002	

In the Matter of:	))))
PHH CORPORATION,	)
PHH MORTGAGE CORPORATION,	)
PHH HOME LOANS LLC,	)
ATRIUM INSURANCE CORPORATION,	)
and ATRIUM REINSURANCE	)
CORPORATION	)
•	, )
;	)

## **DECLARATION OF DONALD R. GORDON**

## I, Donald R. Gordon, declare as follows:

- 1. I am Enforcement Counsel for the Consumer Financial Protection Bureau. I have personal knowledge of the facts stated below. I submit this declaration in support of Enforcement Counsel's Motion to Disqualify Schnader Harrison Segal & Lewis LLP, filed on April 15, 2014 with the Bureau's Office of Administrative Adjudication.
- 2. Attached hereto as Exhibit A is a true and correct copy of a February 26, 2014, email from Enforcement Attorney Navid Vazire to former Radian Guaranty, Inc. (Radian) employee Steve Young.
- 3. Attached hereto as Exhibit B is a true and correct copy of a February 26, 2014, email from Enforcement Attorney Navid Vazire to Steve Young, sent subsequent to the email attached hereto as Exhibit A.

- 4. Attached hereto as Exhibit C is a true and correct copy of the Notice to Persons Supplying Information Form, which was an attachment to the email attached hereto as Exhibit B.
- 5. Attached hereto as Exhibit D is a true and correct copy of the Interview Report, prepared by Enforcement Investigator Theresa Ridder, summarizing Enforcement Counsel's March 7, 2014, interview with former Radian employee Steve Young.
- 6. Attached hereto as Exhibit E is a true and correct copy of a March 7, 2014, email from Enforcement Investigator Theresa Ridder to former Radian CEO Frank Filipps.
- 7. Attached hereto as Exhibit F is a true and correct copy of a March 17, 2014, email from Enforcement Attorney Kimberly Ravener to Stephen Fogdall.
- 8. Attached hereto as Exhibit G is a true and correct copy of Interview Report, prepared by Enforcement Investigator Theresa Ridder, summarizing Enforcement Counsel's March 19, 2014, interview with former Radian CEO Frank Filipps.
- 9. Attached hereto as Exhibit H is a true and correct copy of a March 21, 2014, letter from David Smith to Enforcement Attorney Kimberly Ravener.
- 10. Attached hereto as Exhibit I is a true and correct copy of a March 24, 2014, email from Enforcement Attorney Kimberly Ravener to David Smith and Stephen Fogdall.
- 11. Attached hereto as Exhibit J is a true and correct copy of a March 28, 2014, email from Stephen Fogdall to Enforcement Counsel, along with a Rule 109 certification that was attached to that email.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: April 15, 2014 /s/ Donald R. Gordon

Donald R. Gordon Enforcement Counsel

Consumer Financial Protection Bureau 1700 G Street, NW Washington, DC 20552 (202)435-7357