

UNITED STATES OF AMERICA  
Before the  
CONSUMER FINANCIAL PROTECTION BUREAU

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ADMINISTRATIVE PROCEEDING )  
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 )

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**RESPONDENTS' FIRST AMENDED DISCLOSURE OF WITNESSES**

Respondents PHH Corporation, PHH Mortgage Corporation, PHH Home Loans, LLC, Atrium Insurance Corporation, and Atrium Reinsurance Corporation (collectively "Respondents"), hereby provide an amended list of witnesses who may be called to testify on behalf of Respondents in the hearing of this matter. Respondents' amended witness list includes two additional witnesses interviewed by the Bureau on March 7 and 10, 2014, respectively. Respondents received transcripts from such interviews on March 11, 2014. *See* Attachment A, letter reflecting the Bureau's production of interview transcripts.

**WITNESSES**

1. Michael Bogansky, VP, Assistant Controller, PHH Corp., 1 Mortgage Way, Mt. Laurel, NJ 08054, to testify concerning accounting and financial reporting for Atrium and Atrium Re, periodic regulatory filings, external audits, and regulatory examinations.
2. Sam Rosenthal, VP Risk Management, Secondary Marketing, PHH Corp., 1 Mortgage Way, Mt. Laurel, NJ 08054, to testify concerning Atrium's reinsurance agreements, including negotiations, decision-making, and business dealings with private mortgage insurance ("pmi") providers.

3. Kelly Redfearn, Manager, Product Management, PHH Mortgage, 1 Mortgage Way, Mt. Laurel, NJ 08054, to testify concerning business with pmi providers, pmi products, and selection of pmi providers.
4. Richard Bradfield, SVP, Capital Markets & Treasurer, PHH Corp., 1 Mortgage Way, Mt. Laurel, NJ 08054, to testify concerning Atrium's reinsurance agreements, commutation of reinsurance agreements, business dealings with pmi providers, and pmi products.
5. Jeff Levine, VP Pricing, PHH Mortgage, 1 Mortgage Way, Mt. Laurel, NJ 08054, to testify concerning loan pricing, Atrium's reinsurance agreements, and dealings with pmi providers.
6. Mark Danahy, Managing Director, CitiMortgage, Inc., 1000 Technology Drive, O'Fallon, MO 63368, to testify concerning Atrium's reinsurance agreements, selection of and dealings with pmi providers, evaluation of risks, and commutation of reinsurance agreements.
7. Claire H. McDonald, VP Legal, PHH Mortgage, 1 Mortgage Way, Mt. Laurel, NJ 08054, to testify concerning Atrium's reinsurance agreements, regulatory compliance, and documentation.
8. Fran Ferrara, 1 Mortgage Way, Mt. Laurel, NJ 08054, to testify concerning dealings with pmi providers, and documentation, including affiliated business disclosures.
9. Elizabeth Rudolph, VP Product Development, Capital Markets, PHH Mortgage, 1 Mortgage Way, Mt. Laurel, NJ 08054, to testify concerning dealings with pmi providers, pmi volume, and pmi product offerings.
10. Chris Bowen-Ashwin, Manager, Financial Reporting, PHH Corp., 1 Mortgage Way, Mt. Laurel, NJ 08054, to testify concerning regulatory filings and accounting for Atrium/Atrium Re.
11. Leonard Crouse, 148 College St, Burlington, VT 05401, and/or current Vermont regulator for captive reinsurance, to testify concerning regulation of captive reinsurance, risk analysis, and regulatory approval of reinsurance agreements.
12. Kenneth A. Bjurstrom, Principal, Financial Consultant at Milliman, 15800 W. Bluemound Road, Suite 100, Brookfield, WI 53005, to testify concerning pmi reinsurance, including risk analysis and pricing, and analysis of pmi reinsurance agreements, including Atrium's pmi reinsurance agreements.
13. Michael C. Schmitz, Principal, Consulting Actuary at Milliman, 15800 W. Bluemound Road, Suite 100, Brookfield, WI 53005, to testify concerning pmi reinsurance, including risk analysis and pricing, and analysis of pmi reinsurance agreements, including Atrium's pmi reinsurance agreements.
14. Corporate Representative from AIG United Guaranty Mortgage Insurance Company ("UGI") 230 N. Elm Street, Greensboro, North Carolina 27401, to testify concerning pmi reinsurance agreements, negotiations and discussions regarding Atrium's

- reinsurance and trust agreements, cession statements, commutation/termination of reinsurance agreements, and dealings with state and federal regulators.
15. Daniel Thomas Walker, Jr., Senior Vice President and Chief Operating Officer of International Division, United Guaranty, 230 N. Elm Street, Greensboro, North Carolina 27401, to testify concerning items in connection with the CFPB Investigational Hearing held on August 5, 2013, including his role with United Guaranty, risk management, captive reinsurance arrangements, mortgage insurance, risk transfer, ceded premiums, and negotiations with reinsurance providers.
  16. Chris Clement, Senior Vice President of Production, UGI Sales Department, 230 N. Elm Street, Greensboro, North Carolina 27401, to testify concerning items in connection with his interview the CFPB held on December 20, 2013, including employment with UGI, dealings with Respondents, captive reinsurance sales, and UGI's portfolio.
  17. Carol Lawson, UGI Reinsurance Accounting Department, 230 N. Elm Street, Greensboro, North Carolina 27401, to testify concerning reinsurance, audits, accounting, reinsurance agreements, and dealings with Respondents.
  18. Corporate Representative from Genworth Mortgage Insurance Company, 6601 Six Forks Road, Raleigh, North Carolina 27615, to testify concerning pmi reinsurance agreements, negotiations and discussions regarding Atrium's reinsurance and trust agreements, cession statements, commutation/termination of reinsurance agreements, and dealings with state and federal regulators.
  19. Corporate Representative from Radian Group, Inc., 1601 Market Street Philadelphia, Pennsylvania 19103, to testify concerning pmi reinsurance agreements, negotiations and discussions regarding Atrium's reinsurance and trust agreements, cession statements, commutation/termination of reinsurance agreements, and dealings with state and federal regulators.
  20. Lora Wasson, National Account Manager, Radian Guaranty, 1601 Market Street, Philadelphia, Pennsylvania 19103, to testify concerning items in connection with her interview with the CFPB on January 13, 2014, including her role with Radian, risk management, sales and account management, dealings with Respondents, and captive reinsurance arrangements.
  21. Michael Daiuba, Senior Vice President and National Sales Manager, Radian Guaranty, 1601 Market Street, Philadelphia, Pennsylvania 19103, to testify concerning items in connection with his interview with the CFPB on January 15, 2014, including his role at Radian, captive reinsurance arrangements, and dealings with Respondents.
  22. Corporate Representative from CMG Mortgage Insurance Company, 3003 Oak Road Walnut Creek, California 94597, to testify concerning pmi reinsurance agreements, negotiations and discussions regarding Atrium's reinsurance and trust agreements,

- cession statements, commutation/termination of reinsurance agreements, and dealings with state and federal regulators.
23. Corporate Representative from Mortgage Guaranty Insurance Corporation, 250 E Kilbourn Ave, Milwaukee, Wisconsin 53202, to testify concerning pmi reinsurance and trust agreements, the commutation/termination of such agreements, dealings and negotiations with lenders and reinsurance providers, including Respondents, and communications with state and federal regulators.
  24. Mark Krauter, Vice President and National Account Manager, MGIC, 250 E Kilbourn Ave, Milwaukee, Wisconsin 53202, to testify concerning items in connection with his interview with the CFPB on January 10, 2014, including his role with MGIC, captive reinsurance arrangements, risk transfer, deep cede arrangements, and dealings with Respondents.
  25. John Schroeder, Vice President of Risk Management, MGIC, 250 E Kilbourn Ave, Milwaukee, Wisconsin 53202, to testify concerning items in connection with his interview with the CFPB on January 8, 2014, including his role with MGIC, risk management, captive reinsurance arrangements, negotiations with reinsurance companies and brokers, deep cede arrangements, and dealings with Respondents.
  26. Corporate Representative from Old Republic International Corporation, 307 N. Michigan Ave., Chicago, Illinois 60601, to testify concerning pmi reinsurance and trust agreements, the commutation/termination of such agreements, dealings and negotiations with lenders and reinsurance providers, including Respondents, and communications with state and federal regulators.
  27. Christopher M. Kennedy, Managing Director, Business Development, MountainView Capital, formerly National Account Manager, Republic Mortgage Insurance Company, 999 18th St # 1001, Denver, Colorado 80202, to testify concerning items in connection with the CFPB Investigational Hearing held on December 17, 2013, including sales of mortgage insurance, his role with RMIC, pmi reinsurance, and dealings with Respondents.
  28. Corporate Representative from Triad Guaranty, Inc., 101 South Stratford Road Winston-Salem, North Carolina 27104, to testify concerning pmi reinsurance and trust agreements, the commutation/termination of such agreements, dealings and negotiations with lenders and reinsurance providers, including Respondents, and communications with state and federal regulators.
  29. Corporate Representative from PMI Group, Inc., PMI Plaza 3003 Oak Road Walnut Creek, California 94597, to testify concerning pmi reinsurance and trust agreements, the commutation/termination of such agreements, dealings and negotiations with lenders and reinsurance providers, including Respondents, and communications with state and federal regulators.
  30. Corporate Representative from Essent Guaranty, Inc., 101 S. Stratford Rd, Winston-Salem, North Carolina 27104, to testify concerning pmi reinsurance and trust

- agreements, the commutation/termination of such agreements, dealings and negotiations with lenders and reinsurance providers, including Respondents, and communications with state and federal regulators.
31. Representative from the Office of the Comptroller of the Currency (“OCC”) to testify regarding the approval of captive reinsurance subsidiaries for National Banks.
  32. Representative from the OCC, as successor to the Office of Thrift Supervision (“OTS”), to testify regarding the approval of captive reinsurance subsidiaries for entities under the supervision of the OTS.
  33. Representative from the Federal National Mortgage Association (“FNMA” or “Fannie Mae”), 3900 Wisconsin Ave., NW, Washington, District of Columbia 20016, to testify regarding the requirements for pmi, claims made by FNMA under pmi policies, and the approval process for pmi providers.
  34. Representative from the Federal Home Loan Mortgage Corporation (“FHLMC” or “Freddie Mac”), 8200 Jones Branch Dr., McLean, Virginia 22102, to testify regarding the requirements for pmi, the decision in 2008 to limit pmi providers to a maximum cede of 25%, claims made by FHLMC under pmi policies, and the approval process for pmi providers .
  35. Michael Joseph Cascio, FCAS, MAAA (expert witness).
  36. David Tubolino, National Account Manager, Genworth, 6601 Six Forks Road, Raleigh, North Carolina 27615, to testify regarding his role with Genworth, products and services offered, Genworth’s relationship with Respondents and competing pmi companies, the negotiation of captive reinsurance agreements, and deep cede arrangements.
  37. Steve Young, Solebury Landscaping, formerly National Account Manager for Radian, 115 Muirhead Ave, Trenton, New Jersey 08638, to testify regarding his role with Radian, products and services offered, Radian’s relationship with Respondents and competing pmi companies, and the negotiation of captive reinsurance agreements.

Respondents reserve the right to call any witness listed by the Consumer Financial Protection Bureau or any other party, and to call additional witnesses for purposes of impeachment or rebuttal.

Dated: March 14, 2014

Respectfully submitted,

WEINER BRODSKY KIDER PC

By: /s/ David M. Souders  
Mitchel H. Kider, Esq.  
David M. Souders, Esq.  
Sandra B. Vipond, Esq.

Rosanne L. Rust, Esq.  
1300 19th Street, N.W., Fifth Floor  
Washington, D.C. 20036  
(202) 628-2000

Attorneys for Respondents  
PHH Corporation, PHH Mortgage Corporation, PHH Home  
Loans, LLC, Atrium Insurance Corporation, and Atrium  
Reinsurance Corporation

**CERTIFICATION OF SERVICE**

I hereby certify that on the 14th day of March, 2014, I caused a copy of the foregoing Respondents' Disclosure of Witnesses be filed with the Office of Administrative Adjudication and served by electronic mail on the following parties:

Lucy Morris Lucy.Morris@cfpb.gov	David Smith dsmith@schnader.com
Sarah Auchterlonie Sarah.Auchterlonie@cfpb.gov	Stephen Fogdall sfogdall@schnader.com
Donald Gordon Donald.Gordon@cfpb.gov	William L. Kirkman billk@bourlandkirkman.com
Kim Ravener Kim.Ravener@cfpb.gov	Reid L. Ashinoff reid.ashinoff@dentons.com
Navid Vazire Navid.Vazire@cfpb.gov	Melanie McCammon melanie.mccammon@dentons.com
Thomas Kim Thomas.Kim@cfpb.gov	Ben Delfin ben.delfin@dentons.com
Kimberly Barnes Kimberly.Barnes@cfpb.gov	Jay N. Varon jvaron@foley.com
Fatima Mahmud Fatima.Mahmud@cfpb.gov	Jennifer M. Keas jkeas@foley.com
Jane Byrne janebyrne@quinnemanuel.com	
William Burck williamburck@quinnemanuel.com	
Scott Lerner scottlerner@quinnemanuel.com	

/s/ Michael Trabon  
Michael Trabon