

UNITED STATES OF AMERICA
Before the
CONSUMER FINANCIAL PROTECTION BUREAU

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.)

**RESPONDENTS' NOTICE REGARDING DISCOVERY REQUESTS
PROPOUNDED IN *MUNOZ* LITIGATION FOR PRODUCTION
OF CFPB INVESTIGATIVE FILE AND THIRD-PARTY DOCUMENTS**

Pursuant to paragraph 14 of the Protective Order Governing Discovery Material (Doc. 48), as amended (Doc. 178), counsel for Respondents PHH Corporation, PHH Mortgage Corporation, PHH Home Loans, LLC, Atrium Insurance Corporation, and Atrium Reinsurance Corporation (collectively "Respondents"), hereby provide notice of discovery requests seeking the production of specified documents, filings and transcripts from the above-referenced matter, portions of which are redacted and/or protected from disclosure pursuant to the terms of the Protective Order.

Respondents, who are also Defendants in the case of *Munoz v. PHH Corp., et al.*, No. 1:08-cv-759 (E.D. Cal.), have been served with Plaintiffs' Third Set of Requests for Production of Documents ("*Munoz* Document Requests"), a copy of which is attached hereto as Exhibit A. Among other things, Plaintiffs in the *Munoz* case are seeking production of the CFPB's entire investigative file and any third-party documents Respondents received in connection with this enforcement action, *see* Doc. Request Nos. 2 and 3, along with "[u]nredacted versions of all

briefing; exhibits; transcripts; expert reports; expert, third party, or party deposition transcripts; or other documents filed or lodged in the CFPB Enforcement Action[,]” as well as the final hearing transcript. Doc. Request Nos. 5 and 6.

Under Fed. R. Civ. P. 34, Respondents/Defendants’ responses to the *Munoz* Document Requests are due on September 1, 2015, although Plaintiffs have requested expedited responses. While Respondents may serve objections to certain of the Document Requests, it is their present intention to produce, subject to the terms of the protective order in the *Munoz* case, all of the documents they received from the CFPB, *i.e.*, its investigative file, as well as unredacted versions of all filings and transcripts in this action on September 1, 2015.

Dated: July 31, 2015

Respectfully submitted,

WEINER BRODSKY KIDER PC

By: /s/ David M. Souders
Mitchel H. Kider, Esq.
David M. Souders, Esq.
Sandra B. Vipond, Esq.
Michael S. Trabon, 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 31st day of July, 2015, I caused a copy of the foregoing Notice Regarding Discovery Requests Propounded in *Munoz* Litigation for Production of CFPB Investigative File and Third-Party Documents, with attached Exhibit, to be filed with the Office of Administrative Adjudication and served by electronic mail on the following parties:

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

/s/ Hazel Berkoh
Hazel Berkoh