

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' NOTICE REGARDING REQUEST TO  
PRODUCE THIRD PARTY DOCUMENTS IN THE MUNOZ LITIGATION**

Counsel for Respondents PHH Corporation, PHH Mortgage Corporation, PHH Home Loans, LLC, Atrium Insurance Corporation, and Atrium Reinsurance Corporation (collectively "Respondents"), hereby provide notice regarding a request they received from counsel for the plaintiffs in *Munoz v. PHH Corp., et al.*, No. 1:08-cv-759 (E.D. Cal.), for the production of third party documents obtained by Respondents in connection with this matter. Specifically, counsel for the *Munoz* plaintiffs is taking the position that, pursuant to an Order entered in the *Munoz* case compelling Respondents to produce to plaintiffs any documents they *produced* to the CFPB in connection with its investigation, Respondents are also required to produce any documents they *received* from Enforcement Counsel as part of the government's disclosure obligations, including documents obtained from the third party mortgage insurers who have intervened in this

matter. A copy of the April 4, 2014 letter received from plaintiffs' counsel is attached as Exhibit A hereto.<sup>1</sup>

Respondents will take the position that they are not required to produce the requested materials, but wanted to provide notice to the Bureau and intervenors in this matter whose interests are affected by this request.

Dated: April 10, 2014

Respectfully submitted,

WEINER BRODSKY KIDER PC

By: /s/ David M. Souders  
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<sup>1</sup> As the tribunal may recall, on March 25, 2014, counsel for the *Munoz* plaintiffs attempted to attend the hearing but was asked to leave the courtroom because of the confidential nature of the evidence being presented. *See* March 25, 2014 Transcript at 298-302.

**CERTIFICATION OF SERVICE**

I hereby certify that on the 10th day of April, 2014, I caused a copy of the foregoing Notice Regarding Request to Produce Third Party Documents in the *Munoz* Litigation to be filed with the Office of Administrative Adjudication and served by electronic mail on the following parties:

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/s/ Hazel Berkoh  
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