

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)

**MOTION OF PHH CORPORATION, PHH MORTGAGE CORPORATION, PHH
HOME LOANS, LLC, ATRIUM INSURANCE CORPORATION, AND ATRIUM
REINSURANCE CORPORATION REQUESTING A LIST OF DOCUMENTS
WITHHELD BY ENFORCEMENT COUNSEL**

Pursuant to 12 C.F.R. § 1081.206(c), respondents PHH Corporation, PHH Mortgage Corporation, PHH Home Loans, LLC, Atrium Insurance Corporation, and Atrium Reinsurance Corporation (collectively “Respondents”), request that this tribunal order Enforcement Counsel to produce a list of withheld documents. To date, no such list has been produced despite undersigned counsel’s specific written request. Indeed, Enforcement Counsel has taken the position that it will not produce such a list unless this tribunal orders it do so. Because such a list is essential to Respondents’ ability to ascertain whether Enforcement Counsel has produced all required materials under Rule 206 and to determine whether Enforcement Counsel has not improperly withheld any materials necessary to Respondents’ defense, Respondents respectfully request that this tribunal enter the accompanying proposed order submitted herewith. Such a request is timely as Enforcement Counsel previously indicated that it would provide such a list, yet no list has been forthcoming.

This Motion is based upon the accompanying Brief in Support of Respondents' Motion, all pleadings and other papers filed in this proceeding, and such other matters as may be presented to the tribunal at the time of any hearing.

Dated: April 2, 2014

Respectfully submitted,

WEINER BRODSKY KIDER PC

By: /s/ David M. Souders

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CERTIFICATION OF SERVICE

I hereby certify that on the 2nd day of April, 2014, I caused a copy of the foregoing Respondents’ Motion, Accompanying Brief and Proposed Order to be filed with the Office of Administrative Adjudication and served by electronic mail on the following parties:

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