

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.)

JOINT STIPULATED MOTION FOR A PROTECTIVE ORDER

Pursuant to 12 C.F.R. § 1081.119, and on behalf of the following entities:

Consumer Financial Protection Bureau Office of Enforcement;
PHH Corporation, Respondent;
PHH Mortgage Corporation, Respondent;
PHH Home Loans, LLC, Respondent;
Atrium Insurance Corporation, Respondent;
Atrium Reinsurance Corporation, Respondent;
United Guaranty, Third Party;
Mortgage Guaranty Insurance Corporation, Third Party;
Old Republic International Corporation, Third Party;
Genworth Financial, Inc., Third Party;
Milliman, Inc., Third Party;
Radian Group, Inc., Third Party; and
Essent Guaranty, Inc., Third Party.

Respondents submit the attached proposed Protective Order Governing Discovery Material.

In support of this Motion, the Respondents and Third Parties assert that each produced documents to the Department of Housing and Urban Development (HUD) or the Bureau in response to one or more investigations about captive mortgage reinsurance arrangements. Each has received notice from the Bureau that these documents are likely to be produced to Respondents in this proceeding and may potentially be used as evidence in a public hearing. The

Respondents and Third Parties produced these documents in response to numerous investigative requests from HUD and the Bureau over several years. Thus, the investigative file is comprised of a mix of ordinary business records, confidential and commercial financial information, sensitive personal or financial information, and sensitive information relevant to one or more of the parties' competitors.

In light of this history, the movants proffer a protective order that establishes several classes of confidential materials and provides for a 5-day sealing period on submissions to the Office of Administrative Adjudication so that any party or third party with records at issue can redact sensitive materials prior to public disclosure. Enforcement Counsel note that such an elaborate structure and mechanism may not be appropriate or necessary in other administrative proceedings, rather, this protective order derives from a consensus agreement among the many interests in this instance in light of the investigation's history.

Respectfully submitted,

WEINER BRODSKY KIDER PC

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Corporation, and Atrium Reinsurance
Corporation

Dated: February 28, 2014

CERTIFICATION OF SERVICE

I hereby certify that on the 28th day of February, 2014, I caused a copy of the foregoing Joint Stipulated Motion for a Protective Order, and proposed Order, to be filed with the Office of Administrative Adjudication and served by electronic mail on the following parties who have consented to electronic service:

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