

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.)

**DECLARATION OF MADELINE FLANAGAN IN
SUPPORT OF RESPONDENTS' MOTION FOR CLARIFICATION**

I, Madeline Flanagan, pursuant to 28 U.S.C. § 1746, declare:


1. I am a Senior Vice President and General Counsel for PHH Mortgage Corporation (“PHH Mortgage”), and work at the Company’s headquarters in Mount Laurel, New Jersey.
2. In the time since the Consumer Financial Protection Bureau’s (the “Bureau”) issuance of the initial Civil Investigative Demand, I have been closely involved with Respondents’ defense to the Bureau’s allegations.
3. During the first week of the hearing, March 24-28, 2014, I attended each day of proceedings, except for the last day. Before, during, and after the proceedings, I met with counsel for Respondents to discuss matters relating to the hearing. While I had intended to be present at the hearing on Friday, March 28, I was unable to attend due to an issue that arose at the last minute and required my immediate attention. Further, the other member of my department involved and familiar with this matter happened to be out of the country on that last day, making him unavailable to attend on short notice.

4. Relocation of the hearing to Washington, D.C., will significantly increase the expense and time commitment required for my attendance. This will include additional travel time, as well as lodging and transportation expenses. Attending the hearing in Washington, D.C., over a period of multiple consecutive weeks will also conflict with the various other obligations I have as the General Counsel for PHH Mortgage, making it unlikely that I will be able to attend for any substantial period of time. Notably, while in attendance at the hearing in Washington, D.C., I will be unable to commute to and from my office in the mornings and evenings, to meet with my staff and address other pressing matters, as was feasible while the hearing was held in Philadelphia. Moreover, to the extent I need to attend to another matter in my office, it would preclude me from sending another member of my staff on short notice to the hearing in Washington, D.C., which would be feasible if the hearing is held in Philadelphia, as originally planned.

5. It is my desire, as General Counsel of PHH Mortgage, that either I, or someone else from my office, attend each day of the hearing. While I will not be in attendance during the week of May 19-23 due to a surgery scheduled for May 16, I do intend to send another attorney in my stead. As explained above, conducting the hearing in Washington, D.C., will impede my ability to ensure that PHH Mortgage has a representative present at each day of the proceeding.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 15th day of April, 2014.



Madeline Flanagan, Esq.