

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' MOTION TO QUASH OR, IN THE ALTERNATIVE, TO MODIFY
ENFORCEMENT COUNSEL'S SUBPOENA REQUIRING PRODUCTION OF ALL
COMMUNICATIONS BETWEEN RESPONDENTS AND THE MI COMPANIES**

Pursuant to 12 C.F.R. §§ 1081.208(h)(1) and (2), Respondents PHH Corporation, PHH Mortgage Corporation, PHH Home Loans, LLC, Atrium Insurance Corporation, and Atrium Reinsurance Corporation (collectively, "Respondents"), request that the Tribunal quash or, in the alternative, modify Enforcement Counsel's subpoena. As set forth more fully in the accompanying memorandum, the communications sought by Enforcement Counsel either do not exist or are not relevant to the proceedings. Further, the subpoena is unreasonable, oppressive, and unduly burdensome and, given the stage of the proceedings, it would be highly prejudicial to require Respondents to undertake the document search that would be required to comply with the subpoena as written.

Accordingly, Respondents move to quash the subpoena or, in the alternative, to modify the subpoena to limit it to communications between Respondents and any MI after July 21, 2011, relating solely to the possibility of Atrium/Atrium Re either resuming and/or entering into new captive mortgage reinsurance arrangements either now or in the future.

Dated: May 27, 2014

Respectfully submitted,

WEINER BRODSKY KIDER PC

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