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December 16, 2025

VIA ECF

Hon. M. Miller Baker
Court of International Trade
1 Federal Plaza
New York, New York 10278

**Re: *Munoz et al. v. PHH Corp.*, 1:08-cv-00759-MMB-BAM, Settlement
Administration**

Dear Judge Baker:

We represent Defendants in the above-referenced action. We write jointly with Class Counsel in advance of tomorrow's final approval hearing to inform the Court of an agreed-upon modification to the administration of the settlement as contemplated by section VI.E of the Settlement Agreement, Dkt. 614-2.¹

Specifically, the Parties have agreed to modify the Claim Review Process detailed in section I.G of the Settlement Agreement to extend the timeline by which Settlement Relief checks are to be remitted to Settlement Class Members for accepted Claims submitted before the Effective Date. The Settlement Administrator will finalize the process of validating claims received prior to the Effective Date on or before April 16, 2026, and will remit

¹ Unless otherwise defined, all capitalized and abbreviated terms have the same meaning as in the Settlement Agreement.



Hon. M. Miller Baker

December 16, 2025

Page 2

the appropriate Settlement Relief by check to Settlement Class Members for accepted Claims submitted before the Effective Date on or before May 11, 2026. The reason for the modification is to ensure appropriate cash management for the first tranche of accepted Claims. Counsel for Defendants will be prepared to address the modification at tomorrow's hearing should the Court have questions.

The Parties are in agreement regarding the modification of the timeline, and believe it is a “development[] in the effectuation and administration of th[e Settlement] Agreement,” that section VI.E thereof contemplates will be “dealt with as agreed upon by the Settling Parties.” The Parties are further in agreement that nothing about the modification impacts the Court's approval of the settlement or the notice provided to Settlement Class Members. The Parties nonetheless are providing notice of the modification to the Court in advance of tomorrow's hearing, and will further require the Settlement Administrator to post a copy of this notice on the settlement website.

We look forward to discussing the settlement with the Court tomorrow, and answering any questions the Court may have regarding the settlement, including those questions detailed in Dkt. 623.



Hon. M. Miller Baker
December 16, 2025
Page 3

Respectfully submitted,

/s/ Sabrina M. Rose-Smith

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Attorney for Defendants
PHH Corporation, PHH Mortgage
Corporation, PHH Home Loans, LLC,
and Atrium Insurance Corporation

cc: All Counsel of Record (via ECF)

/s/ Joseph H. Meltzer

(as authorized on December 16, 2025)

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Hon. M. Miller Baker
December 16, 2025
Page 4

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Eastern District of California by using the CM/ECF system on December 16, 2025. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on December 16, 2025.

/s/ Sabrina M. Rose-Smith

Sabrina M. Rose-Smith