

**If you obtained a residential mortgage loan originated and/or acquired by PHH and/or its affiliates from January 1, 2007 through December 31, 2009 and, in connection with that loan, purchased private mortgage insurance that was included within PHH's captive mortgage reinsurance agreements, or if you are the successor, heir and/or assignee of such persons**

## **You May Receive \$875 From a Class Action Settlement<sup>1</sup>**

*A federal court authorized this Notice. This is not a solicitation from a lawyer.*

*Para una notificación en español, visite [www.PHHMISettlement.com](http://www.PHHMISettlement.com) o llame 1-855-779-8982.*

- A settlement has been reached in the class action lawsuit pending in the Eastern District of California entitled *Munoz, et al. v. PHH Corp., et. al.*, Case No. 1:08-cv-00759-MMB-BAM (the "Action").
- Efrain Munoz, Leona Lovette, Stephanie Melani, John Hoffman, and Daniel Maga, II (collectively "Plaintiffs" or "Class Representatives") allege that PHH Corp., PHH Mortgage Corp., PHH Home Loans, LCC, and Atrium Insurance Corp. (collectively "Defendants") violated the law which prohibits the payment of kickbacks in connection with mortgage settlement services. Defendants have denied any wrongdoing. The Court hasn't decided who is right. Instead, the parties agreed to a settlement to avoid more litigation.
- You are receiving this Notice because Defendants' records indicate that you obtained a loan originated and/or acquired by PHH and/or its affiliates from January 1, 2007 through December 31, 2009 and, in connection with that loan, purchased private mortgage insurance that was included within PHH's captive mortgage reinsurance agreements and therefore, *you may be a member of the proposed Settlement Class*.
- Under the proposed Settlement, Defendants have agreed to pay **\$875 per loan** to Settlement Class Members who file a valid Claim Form, which is included with this Notice.
- Case updates will be provided on the Settlement Website [www.PHHMISettlement.com](http://www.PHHMISettlement.com) or by calling the toll-free hotline at 1-855-779-8982.
- If you are a Settlement Class Member, your legal rights will be affected whether you act or don't act. Please read this Notice carefully.

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<sup>1</sup> Each loan obtained by a person meeting this class definition will be defined as a single "Settlement Class Member," regardless of the number of original obligors on such loan, and only one claim will be allowed per loan / Settlement Class Member.

## A Summary of Your Rights and Choices:

*Please Read This Notice Carefully-Your Legal Rights Are Affected Even If You Do Not Act*

YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENT		
<b>File a Claim</b>	This is the only way to get money from the Settlement. <i>See</i> Question 9 below.	August 11, 2026
<b>Exclude yourself from the Settlement Class</b>	You will get no money, but you will keep your rights to sue Defendants about the claims alleged in this case. <i>See</i> Question 14 below.	November 10, 2025
<b>Object to the Settlement</b>	Write to the Court explaining why you don't like the Settlement. <i>See</i> Question 16 below.	November 10, 2025
<b>Go to the Final Approval Hearing</b>	Ask to speak in Court about the Settlement. <i>See</i> Question 23 below.	December 17, 2025
<b>Do Nothing</b>	You won't get money from the Settlement and you will give up your rights to sue Defendants about the claims alleged in this case. <i>See</i> Question 11 below.	

- These rights and options – **and the deadlines to exercise them** – are explained in more detail in this Notice. The deadlines may be moved, canceled, or otherwise modified, so please check the Settlement Website, [www.PHHMISettlement.com](http://www.PHHMISettlement.com), regularly for updates and further details.
- The Court still has to decide whether to approve the proposed Settlement. Payments to Settlement Class Members will be made: (1) if the Court finally approves the Settlement; and (2) **ONLY AFTER** entry of judgment by the Court and any appeal has been fully and finally resolved. We don't know if there will be any appeals or how long any appeal would take. Please be patient.

## WHAT THIS NOTICE CONTAINS

<b>Basic Information.....</b>	<b>4</b>
1. Why did I get this Notice? .....	4
2. What is a class action? .....	4
3. What is this lawsuit about? .....	4
<b>Who is in the Settlement? .....</b>	<b>4</b>
4. How do I know if I am a member of the Settlement Class? .....	4
5. What if I am not sure if I am included in the Settlement Class? .....	4
<b>The Benefits of the Settlement .....</b>	<b>4</b>
6. What does the Settlement provide?.....	4
7. How much will my payment be? .....	5
8. There is more than one borrower on my PHH Loan. Will each of us get a payment? .....	5
<b>How to Get a Payment.....</b>	<b>5</b>
9. What do I need to do to get a payment?.....	5
10. When will I get my payment? .....	5
<b>Remaining in the Settlement Class.....</b>	<b>5</b>
11. What happens if I do nothing? .....	5
12. If I remain in the Settlement Class, what claims am I settling?.....	5
<b>Excluding yourself from the Settlement Class (“Opting Out”).....</b>	<b>6</b>
13. What if I don’t want to be in the Settlement Class? .....	6
14. How do I exclude myself from the Settlement Class?.....	6
<b>Objecting to the Settlement.....</b>	<b>6</b>
15. May I object to the Settlement? .....	6
16. How do I object to the Settlement?.....	6
17. What is the difference between objecting to the Settlement and excluding myself from the Settlement Class? .....	7
<b>The Lawyers Representing You .....</b>	<b>7</b>
18. Do I have a lawyer representing my interests in this class action?.....	7
19. How will the lawyers be paid?.....	7
20. Should I get my own lawyer? .....	8
<b>The Final Approval Hearing.....</b>	<b>8</b>
21. When and where will the Court decide whether to approve the Settlement? .....	8
22. Must I attend the Final Approval Hearing? .....	8
23. Can I attend the Final Approval Hearing? .....	8
<b>Getting More Information .....</b>	<b>8</b>
24. Where do I get more information?.....	8

## BASIC INFORMATION

### 1. Why did I get this Notice?

A Court authorized this Notice to inform Settlement Class Members about this class action and the proposed Settlement, and about all of their rights and options before the Court decides whether to approve the Settlement. This Notice explains the lawsuit, the Settlement and what benefits are available under the Settlement, and Settlement Class Members' legal rights.

### 2. What is a class action?

In a class action, one or more people called plaintiffs or class representatives sue on behalf of a group or a "class" of people who have similar claims. In a class action, the court resolves the issues for all class members at the same time, except for those who exclude themselves from the class.

### 3. What is this lawsuit about?

Class Representatives, who, like you, obtained residential mortgage loans from Defendants and are members of the Settlement Class (defined below), allege that Defendants violated Section 8 of the RESPA statute. In particular, they allege that PHH required certain borrowers to pay premiums, in connection with their mortgage loan payments, for private mortgage insurance. The mortgage insurers who received those payments then entered into reinsurance agreements with PHH's affiliate, Atrium, whereby Atrium was to assume some of the risk on the loan in exchange for a portion of the premiums paid by the borrowers to the mortgage insurers.

Plaintiffs allege that Atrium assumed either no real or an insufficient amount of the risk of those mortgages. Thus, the reinsurance arrangements were merely kickbacks to PHH (and Atrium) in exchange for the referral of business to the mortgage insurers. As a result of this conduct, Plaintiffs allege the Settlement Class overpaid for mortgage insurance.

Defendants deny these allegations and argue that the reinsurance agreements were appropriate and standard reinsurance involving meaningful transfer of risk. Defendants have given numerous defenses to the claims made in this Action, including that the Settlement Class of borrowers did not overpay for mortgage insurance.

The Court has not formed an opinion on certain core elements of Plaintiffs' claims that would impact the ultimate outcome of the case.

## WHO IS IN THE SETTLEMENT?

### 4. How do I know if I am a member of the Settlement Class?

You are a Settlement Class Member if you fit the definition below:

All persons who obtained residential mortgage loans originated and/or acquired by PHH and/or its affiliates from January 1, 2007 through December 31, 2009, and, in connection therewith, purchased private mortgage insurance and whose loans were included within PHH's captive mortgage reinsurance agreements, including the successors, heirs and/or assigns of such persons.<sup>2</sup>

Excluded from the Settlement Class are: (a) Defendants' officers, directors, and employees; (b) Defendants' affiliates and affiliates' officers, directors, and employees; (c) the Released Persons (as defined below in Question 12); (d) all persons who have previously excluded themselves from the certified Class (Dkt. 230, 288, 314); and (e) any Settlement Class Member who timely and properly excludes themselves from the Settlement Class.

Please Note: If you are a Settlement Class Member and you wish to get a payment from the Settlement, you must submit a valid Claim Form postmarked (if mailed), or online via the website [www.PHHMISettlement.com](http://www.PHHMISettlement.com), no later than **August 11, 2026**.

### 5. What if I am not sure if I am included in the Settlement Class?

If you are still not sure whether you are included in the Settlement Class, you can get more information at [www.PHHMISettlement.com](http://www.PHHMISettlement.com), or by calling or writing the Settlement Administrator listed in Question 24.

## THE BENEFITS OF THE SETTLEMENT

### 6. What does the Settlement provide?

Defendants have agreed to pay **\$875 per loan** to Settlement Class Members who file a valid Claim Form. Defendants have also agreed not to object to a request that the Court award Settlement Class Counsel litigation expenses up to \$2,100,000

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<sup>2</sup> Each loan obtained by a person meeting this class definition will be defined as a single "Settlement Class Member," regardless of the number of original obligors on such loan, and only one claim will be allowed per loan / Settlement Class Member.

and attorneys' fees up to \$9,031,000, as well as Settlement administration costs of up to \$500,000, and payments of up to \$5,000 to each of the Class Representatives (*See* Question 19). The payment of these fees and expenses has no impact on the amounts Settlement Class Members will get.

#### **7. How much will my payment be?**

**A Settlement Class Member that files a valid Claim Form by August 11, 2026, may get a payment of \$875 per loan** (*See* Question 8 for information about loans with co-borrowers).

Defendants, Class Representatives, and their respective counsel make no representation concerning any potential tax consequences or tax reporting obligations that you may have by getting a payment from the Settlement. You should consult your own tax advisor(s) regarding tax reporting.

#### **8. There is more than one borrower on my PHH Loan. Will each of us get a payment?**

No. Settlement Class Members who are co-borrowers will only get one payment from the Settlement, issued jointly to all co-borrowers.

In the event there are multiple Settlement Class Members listed as co-borrowers and there are multiple addresses listed for those Settlement Class Members, the check will be mailed to the address associated with the co-borrower who files the Claim Form. In the case that more than one Claim Form is filed for one affected loan, the check will be mailed to the address associated with the co-borrower who files the *first* Claim Form for that loan.

Defendants, Defendants' Counsel, Class Representatives, and Settlement Class Counsel will have no liability to any co-borrower arising from any claim regarding the division of such funds among co-borrowers.

### **HOW TO GET A PAYMENT**

#### **9. What do I need to do to get a payment?**

Eligible Settlement Class Members must complete and timely submit a valid Claim Form by mail to the address below or online at [www.PHHMISettlement.com](http://www.PHHMISettlement.com). To submit by mail, complete and mail the Claim Form included in this Notice at page 10 to:

***Munoz, et al. v. PHH Corp., et al.***  
**c/o JND Legal Administration**  
**P.O. Box 91304**  
**Seattle, WA 98111**

If submitting your Claim Form by mail, it must be postmarked by **August 11, 2026**. If you prefer, you may complete and submit a Claim Form online at [www.PHHMISettlement.com](http://www.PHHMISettlement.com). If you submit a Claim Form online, you must submit it by **August 11, 2026**.

**The Claim Form is posted at [www.PHHMISettlement.com](http://www.PHHMISettlement.com) and can also be obtained from the Settlement Administrator by calling 1-855-779-8982 or writing to the above address.**

#### **10. When will I get my payment?**

Payments will be made to eligible Settlement Class Members who submit a valid Claim Form after the Court grants "final approval" to the Settlement and, if there are any appeals, after all appeals are resolved. If there are any appeals, resolving them can take time. Please be patient.

### **REMAINING IN THE SETTLEMENT CLASS**

#### **11. What happens if I do nothing?**

If you do nothing, you won't get any money from this Settlement. But, unless you exclude yourself from the Settlement Class, you also won't be able to bring a lawsuit or be part of any other lawsuit against Defendants for the claims being resolved by this Settlement.

#### **12. If I remain in the Settlement Class, what claims am I settling?**

If the Settlement becomes final, you (as a "Settlement Class Releasor") will be releasing Defendants and certain related persons and entities (the "Released Persons") from all the claims identified in the Settlement Agreement ("the Released Claims") in exchange for the Settlement payment. The Settlement Agreement, available at [www.PHHMISettlement.com](http://www.PHHMISettlement.com), contains a provision titled, "III. Releases," which you should read carefully. It defines the terms "Settlement Class Releasors," "Released Persons" and "Released Claims" with specific descriptions, in accurate legal terminology.

In summary, the provision provides that upon entry of the Final Approval Order and Final Judgment in this Action, each Settlement Class Member who has not opted out of the Settlement, will be deemed to have fully and forever discharged Defendants, and any affiliated persons or entities, from any and all claims or liabilities, known or unknown, that were raised or could have been raised in this Action.

### **EXCLUDING YOURSELF FROM THE SETTLEMENT CLASS (“OPTING OUT”)**

#### **13. What if I don’t want to be in the Settlement Class?**

If you decide to exclude yourself from the Settlement Class, you may be able to sue Defendants on your own for the claims being resolved by the Settlement **provided you obtained your loan on or after June 2, 2007**. However, you will not get any money from the Settlement, and Settlement Class Counsel will no longer represent you. If you want to get money from the Settlement, do not exclude yourself and file a Claim Form.

**If you obtained your loan before June 2, 2007**, you will not be able to sue Defendants on your own even if you exclude yourself from the Settlement Class because at the time the Complaint in this case was originally filed (June 2, 2008), the statute of limitations had run, barring claims arising out of conduct occurring before June 2, 2007. If you want to receive any recovery for the conduct at issue in the Complaint based upon a loan originating between January 1, 2007 and June 1, 2007, do not exclude yourself from the Settlement Class, and file a Claim Form.

#### **14. How do I exclude myself from the Settlement Class?**

To exclude yourself from the Settlement Class, send a written “Request for Exclusion” to the Settlement Administrator that it is postmarked or emailed by no later than **November 10, 2025**. Your written request must include:

- Your full name, address, telephone number;
- Your loan number with address of the property for which the loan was attached;
- A statement that you want to exclude yourself from the Settlement Class;
- The case name and number: *Munoz, et al. v. PHH Corp., et al.*, Case No. 1:08-cv-00759-MMB-BAM, and
- Your personal signature. Electronic signatures, including DocuSign, are invalid and will not be considered personal signatures.

Requests to exclude yourself from the Settlement Class must be sent to the following address:

***Munoz, et al. v. PHH Corp., et al.***  
**c/o JND Legal Administration**  
**P.O. Box 91304**  
**Seattle, WA 98111**

You can also email a complete and legible scanned copy or photograph of the signed written request to ***info@PHHMISettlement.com***.

You may not exclude Settlement Class Members other than yourself.

Class Representatives, through Settlement Class Counsel, and Defendants will have the right, but not the obligation, to terminate the Settlement in the event that the total number of timely and valid requests for exclusion from the Settlement Class exceeds a certain amount as negotiated by the Parties.

### **OBJECTING TO THE SETTLEMENT**

#### **15. May I object to the Settlement?**

Yes. If you are a Settlement Class Member, and you have not requested to exclude yourself from the Settlement Class, you may object to any aspect of the Settlement, including the fairness of the Settlement, or Settlement Class Counsel’s requests for attorneys’ fees, expenses, and/or Class Representatives’ incentive awards.

#### **16. How do I object to the Settlement?**

To object to the Settlement, you (or your lawyer if you have one) must file a written objection with the Court and send the objection to Settlement Class Counsel and Defendants’ Counsel. Your objection must be postmarked and filed with the Court on or before **November 10, 2025**. Your written objection should include any supporting materials, papers, or briefs that you want the Court to consider. Your written objection must include:

- A detailed statement of your objection(s), as well as the specific reasons, if any, for each such objection, including all evidence, argument, and legal authority you wish to bring to the Court’s attention;
- Your full name, current address, and telephone number;

- The loan number and address of the property to which the loan was attached;
- A statement that you object to the Settlement, in whole or in part, and whether your objection applies only to you or to the entire Settlement Class, and whether you intend to appear at the Final Approval Hearing, and whether you will be represented by separate counsel; and
- This statement, followed by your signature: “I declare under penalty of perjury under the laws of the United States of America that [insert your name] is a member of the Settlement Class.”

You must file your objection with the Court and mail copies to the addresses below no later than **November 10, 2025**.

Court	Class Counsel	Defense Counsel
Clerk of the Court U.S. District Court Eastern District of California 4-200 Robert T. Matsui United States Courthouse 501 I Street Sacramento, CA 95814	Joseph H. Meltzer KESSLER TOPAZ MELTZER & CHECK, LLP 280 King of Prussia Road Radnor, PA 19087 jmeltzer@ktmc.com	Richard Strassberg GOODWIN PROCTER LLP The New York Times Building 620 Eighth Avenue New York, NY 10018-1405 rstrassberg@goodwinlaw.com

Any lawyer representing a Settlement Class Member for the purpose of making objections must also file a Notice of Appearance with the Court and mail the Notice to Counsel (*See* Question 23).

#### 17. What is the difference between objecting to the Settlement and excluding myself from the Settlement Class?

To object to the Settlement, you must remain a Settlement Class Member. An objection allows your views on the Settlement to be heard in Court. You will be bound by the terms and conditions of the Settlement if the Settlement is approved, even if the Court rules against your objection. If you objected to the Settlement but the Court approves the Settlement, as long as you have filed a valid Claim Form by **August 11, 2026**, you may still get money from the Settlement.

When you exclude yourself or opt out of the Settlement Class, you are no longer a Settlement Class Member. You will not be bound by the Settlement. You lose the right to object to the Settlement and you will not get any payment from the Settlement. However, you keep your right to sue Defendants for the same claims in another lawsuit.

### THE LAWYERS REPRESENTING YOU

#### 18. Do I have a lawyer representing my interests in this class action?

Yes. The Court has appointed lawyers to represent you and other Settlement Class Members. These lawyers are called Settlement Class Counsel. You do not have to pay for Settlement Class Counsel. They will ask the Court to approve an award for fees and expenses to be paid by Defendants. Defendants have agreed not to object to such requests (*See* Question 19).

The following attorneys and law firms are Settlement Class Counsel:

Settlement Class Counsel	
Joseph H. Meltzer Terence S. Ziegler Donna Siegel Moffa Lisa Lamb Port KESSLER TOPAZ MELTZER & CHECK, LLP 280 King of Prussia Road Radnor, PA 19087	Stephen G. Larson Paul A. Rigali Steven E. Bledsoe Catherine Owens LARSON LLP 555 South Flower Street, Suite 4400 Los Angeles, CA 90071

#### 19. How will the lawyers be paid?

Settlement Class Counsel will ask the Court to approve an award of attorneys’ fees up to \$9,031,00 and a reimbursement amount of up to \$2,100,00 for the costs and expenses incurred in litigating the case. Defendants have agreed not to object to these requests which will be paid separate and apart from the \$875 per loan that they have agreed to pay to Settlement Class Members who file a valid Claim Form.

Settlement Class Counsel will also request awards of up to \$5,000 be paid to each of the Class Representatives who worked with Settlement Class Counsel on behalf of the entire Settlement Class including participating in discovery and preparing to participate at trial. Like the fees and expenses, Defendants have agreed not to object to these payments and to pay them without regard to or impact upon the \$875 per loan to be paid to Settlement Class Members that file a valid Claim Form.

## **20. Should I get my own lawyer?**

You do not need to hire your own lawyer, but if you hire a lawyer to speak for you or appear in Court, your lawyer must file a Notice of Appearance (See Question 23). If you hire your own lawyer, you will have to pay for that lawyer at your own expense.

## **THE FINAL APPROVAL HEARING**

## **21. When and where will the Court decide whether to approve the Settlement?**

The Court will hold a Final Approval Hearing on **December 17, 2025**, at **10:00 a.m.**, at the United States District Court for the Eastern District of California, Robert T. Matsui United States Courthouse, Courtroom 1, 16<sup>th</sup> floor, located at 501 I Street, Sacramento, California 95814. The Court may reschedule the Final Approval Hearing without further written notice, so you should check the Settlement website or call **1-855-779-8982** if you want to find out if the Final Approval Hearing has been rescheduled.

The purpose of the Final Approval Hearing is to:

- Decide if the Settlement is fair, reasonable, adequate and in the best interests of the Settlement Class, if it should be approved, and if a judgment should be entered;
- Consider Settlement Class Counsel's requests for an award of attorneys' fees and reimbursement of expenses;
- Consider the request for incentive awards for the Settlement Class Representatives;
- Consider all objections; and
- Consider any other issues that the Court thinks are necessary.

## **22. Must I attend the Final Approval Hearing?**

No. Attendance is not required. Settlement Class Counsel are prepared to answer questions on your behalf. Settlement Class Members who filed and served written objections may (but do not have to) appear at the Final Approval Hearing, in person or through an attorney hired at their own expense.

## **23. Can I attend the Final Approval Hearing?**

Yes, anyone can attend the Final Approval Hearing and watch. If you want to appear at the Final Approval Hearing and object, in person or through an attorney hired at your own expense, you need to file the Notice of Intent to Appear with the Court, as well as mail the Notice of Intent to Appear to the addresses listed in Question 16 so that it is received by **November 10, 2025**. The Notice of Intent to Appear must contain the following information:

- The full name, address, and telephone number of the Settlement Class Member and, if applicable, the name, address, and telephone number of the Settlement Class Member's attorney (who must file a Notice of Appearance);
- The objection, including any supporting papers; and
- The name and address of any witnesses to be presented at the Final Approval Hearing, together with a statement as to the matters on which they wish to testify and a summary of the proposed testimony.

## **GETTING MORE INFORMATION**

## **24. Where do I get more information?**

This Notice only summarizes the Settlement. You can get a copy of the Settlement Agreement and other important documents at [www.PHHMISettlement.com](http://www.PHHMISettlement.com). You may also write to *Munoz, et al. v. PHH Corp., et al.*, c/o JND Legal Administration, P.O. Box 91304, Seattle, WA 98111 or call the Settlement Administrator at 1-855-779-8982.

Complete copies of public pleadings, Court rulings, and other filings are available for review and copying at the Clerk's office. The address is, United States District Court for the Eastern District of California, Robert T. Matsui United States Courthouse, Courtroom 1, 16<sup>th</sup> floor, located at 501 I Street, Sacramento, California 95814. *Please do not contact the Court or the Judge regarding this Notice.*

DATED: September 10, 2025.

BY ORDER OF THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA