

ClaimID: <<ClaimID>>

PIN: <<PIN>>

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

If you closed on a mortgage loan originated by PHH Corporation, PHH Mortgage Corporation, PHH Home Loans, LLC, or any of their affiliates and paid title-, escrow-, or closing-related charges to Title Resource Group LLC or any of its affiliates, you could get a payment from a class action settlement.

A federal court has authorized this Notice. This is not a solicitation from a lawyer. Please read this Notice carefully and completely.

THIS NOTICE MAY AFFECT YOUR RIGHTS. PLEASE READ IT CAREFULLY.

- A proposed Settlement has been reached in a class action lawsuit concerning whether borrowers who obtained a mortgage loan from PHH Corporation, PHH Mortgage Corporation, PHH Home Loans, LLC, or their affiliates (including loans where PHH Mortgage Corporation provided origination services for its Private Label Solutions Partners) on or after November 25, 2014 and on or before November 25, 2015 (the “Class Period”) were improperly referred for title-, escrow-, or closing-related services from Title Resource Group LLC or its affiliates in exchange for things of value.
- You are receiving this Notice because Defendants’ records indicate that you may be included in this Settlement as a “Class Member” because you may have paid for these title-, escrow-, or closing-related services. Based upon Defendants’ records, the amount of title-, escrow-, and closing- related charges that you paid, if any, is listed on page 4.
- Your legal rights will be affected whether you act or do not act. Therefore, you should read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:

DO NOTHING	If you choose to do nothing you will remain in the Settlement and receive a Settlement payment. However, you will give up your rights to be part of any other lawsuit or legal proceeding against the Defendants or Defendants’ Releasees about the claims made in this case and released by the Amended Stipulation of Settlement.
SUBMIT A CLAIM FORM DUE DATE: MAY 14, 2018	If you disagree with the amount listed on page 4 and can show you paid a different amount of title-, escrow-, and closing- related charges to Title Resource Group LLC or any of its affiliates in a transaction covered by the Settlement, you may submit a Claim Form for that amount.
EXCLUDE YOURSELF DUE DATE: MAY 14, 2018	Remove yourself from the Settlement. Get no payment from it. This is the only option that allows you to be part of any other lawsuit or legal proceeding against the Defendants or Defendants’ Releasees about the claims made in this case and released by the Amended Stipulation of Settlement.
OBJECT DUE DATE: MAY 14, 2018	Write to the Court about why you do not like the Settlement.
GO TO A HEARING ON AUGUST 16, 2018	Speak in Court about the fairness of the Settlement.

BASIC INFORMATION

1. Why did I get this Notice?

A federal court authorized this because you have the right to know about the proposed Settlement of this class action lawsuit and about all of your rights and options before the Court decides whether to grant final approval of the Settlement. This notice explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Hon. Fernando M. Olguin of the United States District Court for the Central District of California, Southern Division is overseeing this class action. The case is known as *Dodge, et al. v. PHH Corporation, et al.*, Case No. 8:15-cv-01973-FMO-AFM (the “Action”). The people who filed this lawsuit are called the “Plaintiffs” and the companies they sued, PHH Corporation, PHH Mortgage Corporation, PHH Broker Partner Corporation (together the “PHH Defendants”), PHH Home Loans, LLC, RMR Financial, LLC, NE Moves Mortgage LLC (together the “PHH Home Loans Defendants”), Realogy Group LLC, Realogy Holdings Corp., Realogy Intermediate Holdings LLC, Title Resource Group LLC, West Coast Escrow Company, TRG Services Escrow, Inc., Equity Title Company, NRT LLC, Realogy Services Group LLC, and Realogy Services Venture Partner LLC (together the “Realogy Defendants”), are all called the “Defendants.”

QUESTIONS? GO TO WWW.REALESTATEFEESETTLEMENT.COM OR CALL 866-651-8299

2. What is this lawsuit about?

The Plaintiffs claimed that borrowers who closed on a mortgage loan with the PHH Defendants or the PHH Home Loans Defendants during the Class Period were improperly referred for title-, escrow-, and closing-related services to Title Resource Group LLC or its affiliates (who are among the Realogy Defendants) in exchange for certain things of value and that this practice violated a federal statute called the Real Estate Settlement Procedures Act (“RESPA”), 12 U.S.C. § 2607, *et seq.*

The Defendants deny these and all other claims made in the Action. By entering into the Settlement, the Defendants are not admitting that they did anything wrong.

3. Why is this a class action?

In a class action, one or more people, called the Class Representatives (in this case Neil Dodge, Sheri Dodge, Ram Agrawal, and Sarita Agrawal), sue on behalf of all people who have similar claims. Together all of these people are called a Class or Class Members. One court resolves all of the issues for all Class Members, except for those Class Members who exclude themselves from the Class.

4. Why is there a Settlement?

The Class Representatives and the Defendants do not agree about the claims made in this Action. The Action has not gone to trial and the Court has not decided in favor of either the Class Representatives or the Defendants. Instead, the Class Representatives and the Defendants have agreed to settle the Action. The Class Representatives and their lawyers believe the Settlement is best for all Class Members because of the risks associated with continued litigation and the nature of the defenses raised by the Defendants.

WHO IS INCLUDED IN THE SETTLEMENT

5. How do I know if I am part of the Settlement?

If you received this Notice in the mail, you are a Class Member. Specifically, you are included in the Class as a “Class Member” if on or after November 25, 2014 and on or before November 25, 2015, you (1) closed on a mortgage loan originated by PHH Corporation, PHH Mortgage Corporation, PHH Home Loans, LLC, or any of their affiliates (including loans where PHH Mortgage Corporation provided origination services on behalf of any PLS Partners), and (2) paid title-, escrow-, or closing-related charges in connection with that mortgage loan to Title Resource Group LLC or any of its affiliates.

Affiliates of (1) PHH Corporation, (2) PHH Mortgage Corporation, and (3) PHH Home Loans LLC; and PLS Partners		
Axiom Financial/Axiom Financial LLC	Axiom Residential Lending	Banco Popular North America
Bank of America, N.A.	Burnet Mortgage Services	Cartus Home Loans/Cartus Home Loans, LLC
Century 21 Mortgage/Century 21 Mortgage Corporation	Coldwell Banker Home Loans/Coldwell Banker Home Loans, LLC	Coldwell Banker Mortgage/Coldwell Banker Mortgage Corporation
Comerica Bank	ERA Home Loans/ERA Home Loans, LLC	ERA Mortgage/ERA Mortgage Corporation
First Capital	Goldman Sachs Bank USA	HSBC Bank USA, N.A.
Instamortgage.com/ Instamortgage.com Corporation	KeyBank National Association	Landover Mortgage, LLC
Long Island Mortgage Group, Inc.	Morgan Stanley Private Bank, National Association	Mortgage California
MortgageSave.com/ MortgageSave.com Corporation	NE Moves Mortgage, LLC	Northfield Bank
Pacific Access Mortgage, LLC	PHH Home Loans, LLC	PHH Home Mortgage LLC
PHH Mortgage Capital LLC	PHH Mortgage Corporation	Princeton Capital
RMR Financial, LLC	Rocky Mountain Mortgage Loans	Speedy Title & Appraisal Review Services LLC
Sunbelt Lending Services	TIAA-CREF Trust Company, FSB	UBS Bank USA
UBS AG, Tampa Branch		

Affiliates of Title Resource Group LLC		
Accredited Real Estate Academy	Guardian Title Agency, LLC	Riverbend Title Agency, LLC
American Title Company of Houston	Guardian Title Company	Riverbend Title, LLC
Bromac Title Services LLC	Horizon Settlement Services	Rocky Mountain Title
Burnet Title Holding LLC	Independence Title Company	RT Title Agency, LLC
Burnet Title LLC	Keystone Closing Services LLC	Secured Land Transfers LLC
Burnet Title of Indiana, LLC	Keystone Title Services	Settlement Services of Pittsburgh
Burnet Title of Wisconsin	Keystone Transfer Services	Skyline TRG Title Agency
Century 21 Settlement Services	Lakecrest Relocation Services	St. Joe Title Services, LLC
Closing Works	Landmark Title	St. Mary's Title Services, LLC
Coldwell Banker New England Title	Landway Settlement Services	Sunbelt Title Agency
Coldwell Banker Settlement Services	Mardan Settlement Services	Terra Coastal Escrow, Inc.
Coldwell Banker Settlement Services of Pittsburgh	Market Street Commercial Title Company	Texas American Relocation Services
Coldwell Banker Settlement Services of Western Pennsylvania	Market Street Settlement	Texas American Title Company
Commercial Title Resource Group	Market Street Settlement Group, LLC	The Masiello Group Closing Services, LLC
Convenient Closing Services	MASettlement	Title Resource Group Agency
Cornerstone Title Company	Mercury Title, LLC	Title Resource Group LLC
Cypress Title Corporation	Metro Title, LLC	Title Resource Group of Minnesota
Equity Closing	Mid-Atlantic Settlement Services	Title Resource Group Settlement Services, LLC
Equity Closing Services Group	National Coordination Alliance	Title Resources Guaranty Company
Equity Title Company	National Coordination Alliance LLC	TRG Closing Services
Equity Title Messenger Service Holding LLC	NRT Settlement Services of Missouri, LLC	TRG Commercial
ERA Settlement Services	NRT Title Services of Maryland, LLC	TRG Services, Escrow, Inc.
First Advantage Title, LLC	Platinum Title	TRG Settlement Services, LLP
First California Escrow Corporation	Platinum Title & Settlement Services	TRG Title Agency
Florida Relocation Closing Services	Processing Solutions	TRG Vendor Management Company
Gateway Settlement Services	Progressive Title Company, Inc.	TRG/Title Resource Group Commercial
Great East Title Services	Quality Choice Title, LLC	U.S. REO
Great East Title Services of Maine	Residential Title	U.S. Title Guaranty Company of St. Charles
Great East Title Services of New Hampshire	Residential Title Agency	U.S. Title Guaranty Company
GT Agency LLC	Resource Settlement Group LLC	West Coast Escrow Company

6. What does the Settlement provide?

The Defendants will create a \$17,000,000 Settlement Fund. After deducting court-approved attorneys' fees, costs and expenses, service awards to the Class Representatives, taxes due on any interest earned by the Settlement Fund, if necessary, and any notice and claims administration expenses, the balance ("Net Settlement Fund") will be distributed to Class Members.

THE SETTLEMENT BENEFITS

7. What can I get from the Settlement?

Your share of the Net Settlement Fund will depend on, among other things: (i) the number of Class Members who exclude themselves from the Class; (ii) the amount of administrative costs, including the costs of notice; (iii) the amount awarded by the Court for attorneys' fees, costs and expenses, and service awards to the Class Representatives; and (iv) the results of Claim Forms submitted by Class Members who contest their payment amounts.

8. What will my Settlement payment be?

Based on Defendants' records, the Claims Administrator and the Class Representatives estimate you might receive a payment between 15% and 20% of the Amount Paid that is listed below.

The Amount Paid listed below comes from Defendants' business records, and reflects the total amount of the fees shown either on Lines in the 1100 series of your HUD-1 Settlement Statement, or in the section of your Closing Disclosure form, corresponding to the title-, escrow-, and closing-related charges that you paid to Title Resource Group LLC or its affiliates at closing of your real estate transaction that is a subject of the Action.

Amount Paid: \$ [REDACTED] (of which you might receive between 15% and 20% from the Settlement).

If you agree with the Amount Paid listed above, you don't need to do anything.

9. What if I disagree with the Amount Paid listed above?

If you disagree that the Amount Paid listed above accurately reflects the total amount of title-, escrow-, and closing-related charges that you paid to Title Resource Group LLC or its affiliates at closing of your real estate transaction that is a subject of the Action, you may submit a Claim Form specifying what you believe to be the accurate Amount Paid. Claim Forms are available at www.realestatefeesettlement.com or by calling 866-651-8299. Be sure to follow the Claim Form's instructions, and submit all requested information and supporting documents. The Claims Administrator will review your Claim Form and, based upon the information it contains, determine your final Settlement payment. Claim Forms are due by **May 14, 2018**.

10. How and when will I receive a Settlement payment?

If the Court grants final approval of the Settlement, you will receive a Settlement payment in the form of a check. The check will be mailed to the same address as this Notice or the address provided on your Claim Form. If you move before you receive your Settlement payment, you will need to notify the Claims Administrator in writing of your new address.

11. What am I giving up to get a Settlement payment or stay in the Class?

If you are a Class Member and you do not exclude yourself, you are choosing to remain in the Class. If the Settlement is approved and becomes final, all of the Court's orders will apply to you and legally bind you. You won't be able to sue, continue to sue, or be part of any other lawsuit against Defendants and the Defendants' Releasees about the legal issues in this Action and released by the Amended Stipulation of Settlement.

The specific rights you are giving up are called Released Plaintiffs' Claims (see next Question).

The Defendants' Releasees are PHH Corporation, PHH Broker Partner Corp., PHH Mortgage Corporation, Realogy Intermediate Holdings LLC, Realogy Holdings Corp., Realogy Group LLC, Realogy Services Venture Partner LLC, Realogy Services Group LLC, Title Resource Group LLC, West Coast Escrow Company, TRG Services Escrow, Inc., Equity Title Company, NRT LLC, PHH Home Loans, LLC, RMR Financial, LLC, NE Moves Mortgage LLC, and the PLS Partners, all and each of them, and all and each of their respective past and present parents, subsidiaries, and affiliated corporations, limited liability companies, partnerships, and other entities, the predecessors and successors in interest of any of them, and all of their respective past and present officers, directors, employees, agents, members, partners, representatives, attorneys, insurers, and assigns, in their capacities as such.

12. What are the Released Plaintiffs' Claims?

The Released Plaintiffs' Claims are any and all claims, actions, causes of action, rights or liabilities, whether arising out of federal, state, foreign, or common law, including Unknown Claims, of any Class Member, which exist or may exist against any of the Defendants' Releasees by reason of any matter, event, cause or thing that were or could have been alleged: (a) based on the facts, circumstances, transactions, events, occurrences, acts, omissions or failures to act alleged in the Action, including all RESPA claims; and (b) related to the relationships among Defendants' Releasees alleged in Plaintiffs' Fourth Amended Complaint (Dkt. 115) and Settlement Services performed by, obtained by, or paid to any of Defendants' Releasees in the Class Members' real estate transactions that are the subjects of the Action. "Settlement

Services” has the meaning set forth in RESPA, 12 U.S.C. § 2602(3). Released Plaintiffs’ Claims do not include any claims relating to the enforcement of the Settlement, any claims of any person or entity who submits a Request For Exclusion that is accepted by the Court, or any rights Class Members may have in In re PHH Lender Placed Insurance Litigation, No. 12-01117-NLH-KMW (D. N.J. Jan. 19, 2017).

Further detail and information about what you are agreeing to and giving up is detailed in the Stipulation of Settlement, which is available at www.realestatefeesettlement.com or by calling 866-651-8299.

THE LAWYERS REPRESENTING YOU

13. Do I have a lawyer in this case?

Yes, the Court has appointed Daniel S. Robinson, Robinson Calcagnie, Inc., and Evan C. Borges, Greenberg Gross LLP, as Class Counsel to represent Class Members for the purposes of this Settlement. You may hire your own lawyer at your own cost and expense if you want someone other than Class Counsel to represent you in this Action.

14. How will the lawyers be paid?

Class Counsel will file a motion asking the Court to award them attorneys’ fees of up to \$5,100,000 and for reimbursement of costs and expenses of up to \$50,000. They will also ask the Court to approve \$2,500 service awards (\$10,000 total) to the Class Representatives. If awarded, these amounts will be deducted from the Settlement Fund before making payments to Class Members. The Court may award less than these amounts. Any amounts awarded by the Court will come out of the Settlement Fund.

EXCLUDING YOURSELF FROM THE SETTLEMENT

15. How do I get out of the Settlement?

If you are a Class Member and want to keep any right you may have to sue or continue to sue the Defendants or the Defendants’ Releasees on your own based on the claims raised in this Action or released by the Released Plaintiffs’ Claims, then you must take steps to get out of the Settlement. This is called excluding yourself from – or “opting out” of – the Settlement.

To exclude yourself from the Settlement, you must fully complete and sign a Request For Exclusion. A Request For Exclusion form is available at www.realestatefeesettlement.com or by calling 866-651-8299. Mail your Request For Exclusion to the Claims Administrator at the address below, postmarked no later than May 14, 2018:

Dodge v. PHH Corporation Claims Administrator
P.O. Box 404041
Louisville, KY 40233-4041

You cannot exclude yourself by telephone or by e-mail.

16. If I exclude myself, can I still get a Settlement payment?

No. If you exclude yourself, you are telling the Court that you don’t want to be part of the Settlement. You can only get a payment if you stay in the Settlement and submit a valid Claim Form, if necessary.

17. If I do not exclude myself, can I sue the Defendants for the same thing later?

No. Unless you exclude yourself, you give up any right to sue the Defendants or the Defendants’ Releasees for the claims that this Settlement resolves. You must exclude yourself from this Action to start or continue with your own lawsuit or be part of any other lawsuit against Defendants or the Defendants’ Releasees. If you have a pending lawsuit, speak to your lawyer in that case immediately.

OBJECTING TO THE SETTLEMENT

18. How do I tell the Court that I do not like the Settlement?

If you are a Class Member, you can tell the Court that you do not agree with all or any part of the Settlement. You can give reasons why you think the Court should not approve the Settlement. To object, you must mail a letter stating that you object to the Settlement in *Dodge, et al. v. PHH Corporation, et al.*, Case No. 8:15-cv-01973-FMO-AFM. Be sure to include your name, address, telephone number, signature, a statement containing all of the reasons you object to the Settlement, and documents sufficient to prove your membership in the Class, including the property address and date of closing of any real estate transaction that you had during the Class Period. You must also include copies of any documents you wish the Court to consider. Mail the objection to the address listed below, postmarked by May 14, 2018:

QUESTIONS? GO TO WWW.REALESTATEFEESSETTLEMENT.COM OR CALL 866-651-8299

Clerk of the Court
United States District Court
Central District of California
350 West 1st Street
Los Angeles, CA 90012

19. What is the difference between objecting and requesting exclusion?

Objecting is simply telling the Court you do not like something about the Settlement. You can object only if you stay in the Class (that is, do not exclude yourself). Requesting exclusion is telling the Court you do not want to be part of the Class or the Settlement. If you exclude yourself, you cannot object to the Settlement because it no longer affects you.

THE COURT'S FAIRNESS HEARING

20. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing on **August 16, 2018 at 10:00 a.m.** before the Honorable Fernando M. Olguin, United States District Judge for the Central District of California, United States Courthouse, 350 W. 1st Street, 6th Floor, Courtroom 6D, Los Angeles, California 90012.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and whether to approve the Settlement. If there are objections, the Court will consider them, and the Court will listen to people who have asked to speak at the hearing. The Court may also decide how much to award Class Counsel for attorneys' fees, costs and expenses, and whether to make service awards to the Class Representatives.

21. Do I have to come to the Fairness Hearing?

No. Class Counsel will answer any questions the Court may have. However, you are welcome to attend at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mail your written objection on time the Court will consider it.

22. May I speak at the Fairness Hearing?

Yes. If you wish to attend and speak at the Fairness Hearing, you must indicate this in your written objection (see Question 18). Your objection must state that it is your intention to appear at the Fairness Hearing, and must identify any witnesses you may call to testify or exhibits you intend to introduce into evidence at the Fairness Hearing. If you plan to have your attorney speak for you at the Fairness Hearing, your objection must also include your attorney's name, address, and phone number.

IF YOU DO NOTHING

23. What happens if I do nothing at all?

If you are a Class Member and you do nothing, you will receive a Settlement payment. You will also give up rights explained in Questions 11 and 12, including your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Defendants and the Defendants' Releasees about the legal issues in this Action and released by the Amended Stipulation of Settlement.

GETTING MORE INFORMATION

24. How do I get more information?

This Notice summarizes the proposed Settlement. Complete details are provided in the Amended Stipulation of Settlement. The Amended Stipulation of Settlement and other related documents are available at www.realestatefeesettlement.com or by calling 866-651-8299 or by writing to Dodge v. PHH Corporation Claims Administrator, P.O. Box 404041, Louisville, KY 40233-4041. Publicly-filed documents can also be obtained by visiting the office of the Clerk of the United States District Court for the Central District of California or reviewing the Court's online docket.

If you have questions you may contact Class Counsel at:

Robinson Calcagnie, Inc.
19 Corporate Plaza Drive
Newport Beach, CA 92660
949-720-1288

Greenberg Gross LLP
650 Town Center Drive, Suite 1700
Costa Mesa, CA 92626
949-383-2800

Please do not contact the Court regarding this notice. The Court cannot answer any questions.

QUESTIONS? GO TO WWW.REALESTATEFEESSETTLEMENT.COM OR CALL 866-651-8299