Financial Services Webinar Series

CFPB Mortgage Servicing Amendments

Part 3. What You Need to Know: Bankruptcy

September 27, 2016

Presented by:
Jonathan Kolodziej, Chris Hawkins, and Alexandra Dugan

Timeline

November 20, 2014
• CFPB issues proposed rule and opens comment period

March 16, 2015
• Comment period on proposal closes
• To date, CFPB has received and posted 200 comments

April 26, 2016
• Report summarizing testing of bankruptcy periodic statement forms is published in the Federal Register and reopens comment period

May 26, 2016
• Comment period on report and testing method/results closes
• To date, CFPB has received and posted 20 comments

August 4, 2016
• CFPB releases final amendments to existing rules in Regulations X and Z, along with interpretive rule on FDCPA compliance
Summary

Initial release of Mortgage Servicing Rules did not contain exemptions for borrowers in bankruptcy, but Interim Final Rule issued October 2013 granted a reprieve with respect to problematic communication requirements.

The 2016 Final Rule contains bankruptcy requirements covering primarily two key topics:
   1. Early Intervention
   2. Periodic billing statements

In the absence of a bankruptcy exemption or bankruptcy-specific modification, the Mortgage Servicing Rules apply to loans in bankruptcy.

Effective date:
   • 18 months from date published in Federal Register for periodic billing statement requirements for borrowers in bankruptcy
   • 12 months from date published in Federal Register for early intervention requirements

Early Intervention
Early Intervention – Live Contact

Current Rule
• A servicer shall contact the borrower no later than the 36th day of delinquency, and promptly inform the borrower of loss mitigation options, if appropriate
  • This is a recurring obligation for each delinquency
• Servicers are exempt from the early intervention requirements while the borrower is a debtor in bankruptcy

Amended Rule
• Exemption for live contact remains intact while any borrower on an account is a debtor in bankruptcy
• Adds clarity regarding when a servicer must resume compliance

Early Intervention – Written Notice

Current Rule
• A servicer must provide the borrower with an early intervention written notice not later than the 45th day of the borrower's delinquency
  • This is a recurring obligation, but the written notice does not have to be sent more than once during any 180-day period
• Servicers are exempt from this requirement while the borrower is a debtor in bankruptcy.

Amended Rule
• Partial exemption for the written notice obligation
• Modified timing requirements
• Modified content for written notice
• Provides clarity regarding when a servicer must resume full compliance
Early Intervention – Written Notice
Partial Exemption

- While any borrower on a mortgage loan is a debtor in bankruptcy, the servicer, with respect to that mortgage loan, is exempt from the written notice requirement if
  - No loss mitigation option is available, or
  - Any borrower on the mortgage loan has provided a cease communication request in accordance with Section 805(c) of the FDCPA

Early Intervention – Written Notice
Modified Timing

- If a borrower is delinquent when the bankruptcy petition under title 11 of the United States Code is filed, written notice must be sent no later than 45 days after the filing
- If the borrower is not delinquent when the bankruptcy petition is filed, but subsequently becomes delinquent while a debtor in bankruptcy, written notice must be provided not later than the 45th day of the borrower’s delinquency
- Modified timing requirements apply regardless of whether the servicer provided the written notice in the preceding 180-day period
- Early Intervention written notice is not required more than once during a single bankruptcy case
Early Intervention – Written Notice
Modified Content

- Content requirements of § 1024.39(b)(2) still apply:
  - Statement encouraging borrower to contact servicer;
  - Telephone number for assigned servicer personnel;
  - If applicable, a brief description of examples of loss mitigation options that may be available;
  - If applicable, either application instructions or statement regarding how the borrower can obtain more information; and
  - HUD counseling information
- Early Intervention written notice may not contain a request for payment when sent to a borrower that is a debtor in bankruptcy

Early Intervention
Resuming Compliance

- A servicer that was exempt due to a borrower’s bankruptcy must resume compliance after the next payment due date that follows the earliest of the following events:
  - The bankruptcy case is dismissed;
  - The bankruptcy case is closed; and
  - The borrower reaffirms personal liability for the mortgage loan
- Live contact and written notice exemptions continue to apply with respect to a mortgage loan for which the borrower has discharged personal liability
  - Must resume compliance with the modified written notice requirements if the borrower has made any partial or periodic payment after commencement of the bankruptcy case
Early Intervention

CFPB Rationale for Written Notice Requirements
• The CFPB sought to balance the desire to provide information about loss mitigation options to borrowers in bankruptcy with the concerns about sending communications that could be viewed as stay violations

Key Considerations/Takeaways
• Servicers should ensure that bankruptcy milestones are accurately and quickly updated in the system of record
• The early intervention amendments become effective 12 months after the publication date

Periodic Billing Statements
Periodic Billing Statements
Borrowers in Bankruptcy

Current Rule
• Periodic billing statements must be provided for each billing cycle, unless an exemption applies
• A servicer is exempt from sending periodic billing statements for a mortgage loan while the consumer is a debtor in bankruptcy

Amended Rule
• Servicers must send modified periodic billing statements to borrowers in bankruptcy, unless the borrower is exempt
• Modified content requirements
• When a modified statement is required, the modified statement may be sent to any or all primary obligors, even if one of the primary obligors is not a debtor in bankruptcy

Periodic Billing Statements
Bankruptcy Exemption

• Billing statements are not required if:
  • The borrower is in a bankruptcy case or the borrower has discharged personal liability for the mortgage loan pursuant to 11 U.S.C. 727, 1141, 1228, or 1328; and
    o The borrower requests that the servicer cease providing a periodic statement or coupon book in writing;
    o The plan provides for a surrender, avoidance of the lien or does not provide for, the payment of pre-bankruptcy arrearage or the maintenance of payments due;
    o The bankruptcy court order provides for the lien to be avoided, the stay to be lifted or for the servicer to cease providing a periodic statement or coupon book in writing; or
    o A statement of intention is provided for surrender and the borrower has not made a partial or complete payment after the bankruptcy case
Periodic Billing Statements
Bankruptcy Exemption

• Exemption no longer applies if:
  ▪ The debtor reaffirms personal liability; or
  ▪ Any consumer on the loan requests in writing that the servicer provide periodic statements
    o Unless a court enters an order requiring the servicer to cease sending statements
• A servicer may establish an address that the consumer must use to request to opt in or opt out of periodic statements
  ▪ Same address must be designated for opt-in and opt-out requests
  ▪ Servicer must notify the consumer of the address in a manner that is reasonably designed to inform the consumer of the address
  ▪ A consumer’s written request to opt-in or opt-out is effective as of the date of receipt by the servicer

Periodic Billing Statements
Bankruptcy Exemption

• Servicer must transition to sending a modified billing statement, or back to an unmodified billing statement, when any of the following triggers applies:
  ▪ Borrower becomes a debtor in bankruptcy
  ▪ Borrower ceases to be a debtor in bankruptcy
  ▪ Servicer ceases to qualify for an exemption from the billing statement requirements
• Transitional single-billing-cycle exemption
  ▪ Servicers are exempt from sending a billing statement for a single billing cycle when one of the above trigger events occurs within 14 days of the next payment due date
• Timing of first modified or unmodified statement after transition
  ▪ Mailed within a reasonably prompt time after first payment due date or end of courtesy period
**Periodic Billing Statements**

**Bankruptcy Exemption**

**CFPB Rationale for Exemption Requirements**
- The exemptions are tailored to apply to borrowers who have provided some indication that they do not intend to retain the property or affirmatively requested not to receive periodic statements.

**Key Considerations/Takeaways**
- Servicers should ensure that their system of record accurately tracks data points to determine whether an exemption applies, such as surrender or lift of stay.
- Servicers should ensure that reliable logic is utilized to identify when a borrower in bankruptcy is exempt from the periodic statement requirement.

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**Periodic Billing Statements**

**Content**
- Servicers must provide a periodic statement or coupon book to consumers in bankruptcy (or that have received a discharge in bankruptcy), with modifications to account for the bankruptcy status and the specific chapter of bankruptcy in which the consumer is a debtor.
- Sample forms
  - CFPB provided a sample form for accounts in Chapter 7 or 11, and a separate sample form for accounts in Chapter 12 or 13.
- Servicers may use terminology other than that found on the samples, so long as the new terminology is commonly understood.
- Statements may be modified as necessary to facilitate compliance with applicable law or a court order.
Periodic Billing Statements
Content

- CFPB rationale for modified content requirements:
  - The benefit to consumers of providing the modified information in the periodic statements outweighs the burden on servicers
  - The disclosures and modifications to the account information will mitigate the risk that a statement violates the automatic stay and/or discharge order
  - The information required on the modified Chapter 12/13 periodic statements will assist consumers in making timely payments and tracking progress in their cases
  - Even with respect to Chapter 7 cases in which the consumer has received a discharge, periodic statements can assist the consumer in making the payments necessary to retain the residence.

Key Considerations/Takeaways

- Modified statements remove essentially all references to delinquency/late payments
- The servicer may use “contractual” basis for applying all payments received instead of a “bankruptcy” basis.
- The servicer still must be able to provide a running accounting with respect to the consumer’s progress toward repaying the prepetition arrearage
- There still may be a gap with respect to when post-petition “ongoing” payments from a trustee should be considered delinquent.
Periodic Billing Statements
Content – All Bankruptcy Types

• Statement (or coupon book) **may omit:**
  - The amount of any late payment fee, and the date on which that fee will be imposed if payment has not been received
  - The length of the consumer’s delinquency
  - The possible risks, such as foreclosure, and expenses, that may be incurred if the delinquency is not cured
  - A notice of whether the servicer has made the first notice or filing required by applicable law for any judicial or non-judicial foreclosure process, if applicable

• Statement (or coupon book) **must include:**
  - A statement identifying the consumer’s status as a debtor in bankruptcy or the discharged status of the mortgage loan
  - A statement that the periodic statement is for informational purposes only
Periodic Billing Statements
Content – Chapters 12 and 13

• With respect to a mortgage loan in which any consumer with primary liability is a debtor in a Chapter 12 or Chapter 13 case, additional modifications apply

• Statements (or coupon books) may omit certain information that is normally required when the consumer is more than 45 days delinquent:
  ▪ Account history showing the previous six months or the period since the last time the account was current, whichever is shorter
  ▪ A notice indicating any loss mitigation program to which the consumer has agreed, if applicable
  ▪ The total payment amount needed to bring the account current
  ▪ HUD counseling information

Periodic Billing Statements
Content – Chapters 12 and 13

• Amount Due on statement (or coupon book) may be limited to:
  ▪ Date and amount of post-petition payment due; and
  ▪ Any post-petition fees and charges imposed by the servicer

• Explanation of Amount Due on statement (or coupon book) may be limited to:
  ▪ Monthly post-petition payment amount, including a breakdown showing how much, if any, will be applied to principal, interest and escrow;
  ▪ Total sum of any post-petition fees or charges imposed since the last statement; and
  ▪ Any post-petition payment amount past due

<table>
<thead>
<tr>
<th>Explanation of Payment Amount (Post-Petition Payment)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Principal</td>
<td>$3,113.63</td>
</tr>
<tr>
<td>Interest</td>
<td>$1,059.75</td>
</tr>
<tr>
<td>Escrow (Fees and Insurance)</td>
<td>$379.00</td>
</tr>
<tr>
<td><strong>Regular Monthly Payment</strong></td>
<td>$4,542.44</td>
</tr>
<tr>
<td>Total Fees and Charges</td>
<td>$130.00</td>
</tr>
<tr>
<td>Past Due Amount</td>
<td>$3,569.88</td>
</tr>
</tbody>
</table>

The Payment Amount does not include any amount that was paid due before you filed for bankruptcy.
Periodic Billing Statements
Content – Chapters 12 and 13

• Transaction Activity on statement (or coupon book) **must include:**
  ▪ All post-petition payments
  ▪ All pre-petition payments
  ▪ Payments of post-petition fees and charges
  ▪ Post-petition fees and charges the servicer has imposed since last statement

• Source of payments need not be identified

<table>
<thead>
<tr>
<th>Transaction Activity (7/20 to 8/19)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Date</strong></td>
</tr>
<tr>
<td>---------</td>
</tr>
<tr>
<td>8/10/15</td>
</tr>
<tr>
<td>8/13/15</td>
</tr>
<tr>
<td>8/16/15</td>
</tr>
</tbody>
</table>

Periodic Billing Statements
Content – Chapters 12 and 13

• If applicable, servicer **must disclose** information regarding the pre-petition arrearage:
  ▪ Total of all pre-petition payments received since last statement
  ▪ Total of all pre-petition payments received since beginning of the consumer’s bankruptcy case
  ▪ Current balance of the consumer’s pre-petition arrearage

• These items must be grouped in close proximity to each other and located on the first page of the statement, or, alternatively, on a separate page enclosed with the periodic statement or in a separate letter

<table>
<thead>
<tr>
<th>Summary of Amounts Past Due Before Bankruptcy Filing (Pre-Petition Arrearage)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Paid Last Month</strong></td>
</tr>
<tr>
<td><strong>Total Paid During Bankruptcy</strong></td>
</tr>
<tr>
<td><strong>Current Balance</strong></td>
</tr>
</tbody>
</table>
Periodic Billing Statements
Content – Chapters 12 and 13

• Statement (or coupon book) must include, as applicable:
  ▪ A statement that the amount due includes only post-petition payments and does not include other payments that may be due under the terms of the consumer’s bankruptcy plan

  The Payment Amount does not include any amount that was past due before you filed for bankruptcy.

  ▪ If the consumer’s bankruptcy plan requires the consumer to make the post-petition mortgage payments directly to a bankruptcy trustee, a statement that the consumer should send the payment directly to the trustee and not the servicer

  if your bankruptcy plan requires you to send your regular monthly mortgage payments to the Trustee, do not send your payment to us. Instead, you should send your payment to the Trustee.

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Important Messages

We have not received all of your mortgage payments due since you filed for bankruptcy. This statement may not show recent payments you sent to the Trustee that the Trustee has not yet forwarded to us. Please contact your attorney or the Trustee if you have questions.

*Partial Payments: Any partial payments listed here are not applied to your mortgage, but instead are held in one or more separate suspense accounts. Once we receive funds equal to a full monthly payment, we will apply those funds to your mortgage.
Periodic Billing Statements

Coupon Books

- Required disclosures may be included anywhere in the coupon book provided to the consumer, or on a separate page enclosed with the coupon book.
- Upon request, servicer must make available to the consumer (by telephone, in writing, in person, or electronically if consumer consents) the pre-petition arrearage information.
- The same “general” bankruptcy modifications apply to coupon books.
  - Delinquency/foreclosure information may be omitted.
  - Other accounting information:
    - Amount Due
    - Explanation of Amount Due
    - Transaction Activity
    - Additional Disclosures

Sample Forms

Chapter 7/11 Sample Periodic Statement

<table>
<thead>
<tr>
<th>Springside Mortgage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Service: 1-800-955-3134</td>
</tr>
<tr>
<td><a href="http://www.springsideremortgage.com">www.springsideremortgage.com</a></td>
</tr>
<tr>
<td>Jordan and Gina Smith</td>
</tr>
<tr>
<td>4300 Jones Drive</td>
</tr>
<tr>
<td>Memphis, TN 38119</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Bankruptcy Message</th>
</tr>
</thead>
<tbody>
<tr>
<td>Our records show that either you are a debtor in bankruptcy, or you discharged personal liability to your mortgage loan in bankruptcy. We are sending this statement to you for informational and compliance purposes only. It is not an attempt to collect a debt against you. If you want to stop receiving statements, write to us.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mortgage Statement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Statement Date: 8/27/2015</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Account Number</th>
<th>1234567</th>
</tr>
</thead>
<tbody>
<tr>
<td>Payment Date</td>
<td>9/1/2015</td>
</tr>
<tr>
<td>Payment Amount</td>
<td>$1,000.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Explanation of Payment Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Principle</td>
</tr>
<tr>
<td>Interest</td>
</tr>
<tr>
<td>Escrow (Taxes and Insurance)</td>
</tr>
<tr>
<td>Total Escrow Amount</td>
</tr>
<tr>
<td>Tilt Tax and Charges</td>
</tr>
<tr>
<td>Paid Uplift Amount</td>
</tr>
<tr>
<td>Total Paydown Amount</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Account Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outstanding Principal</td>
</tr>
<tr>
<td>Interest Rate (End of October 2015)</td>
</tr>
<tr>
<td>Prepayment Penalty</td>
</tr>
</tbody>
</table>
# Periodic Billing Statements
## Sample Forms

### Chapter 7/11 Sample Periodic Statement (continued)

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
<th>Charges</th>
<th>Payments</th>
</tr>
</thead>
<tbody>
<tr>
<td>7/15/15</td>
<td>Partial Payment Received</td>
<td>$0.00</td>
<td>$2,965.00</td>
</tr>
<tr>
<td>7/15/15</td>
<td>Late Fee Charged because full payment was received by 7/15/2015</td>
<td>$30.00</td>
<td>$0.00</td>
</tr>
</tbody>
</table>

### Past Payments Breakdown

<table>
<thead>
<tr>
<th>Month</th>
<th>Payments Received</th>
<th>Due Date</th>
<th>Payment Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>June</td>
<td>$2,965.00</td>
<td>7/15/15</td>
<td>$2,965.00</td>
</tr>
<tr>
<td>July</td>
<td>$2,965.00</td>
<td>8/15/15</td>
<td>$2,965.00</td>
</tr>
<tr>
<td>August</td>
<td>$2,965.00</td>
<td>9/15/15</td>
<td>$2,965.00</td>
</tr>
</tbody>
</table>

### Important Messages

*Read Payments: For partial payments that you make to your account, the regular due date in the above table is the date you pay. The balance of a partial payment will be applied to your mortgage.*

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### Springside Mortgage

P.O. Box 123411
Los Angeles, CA 90010

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### Chapter 12/13 Sample Periodic Statement

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
<th>Charges</th>
<th>Payments</th>
</tr>
</thead>
<tbody>
<tr>
<td>8/1/15</td>
<td>Partial Payment Received</td>
<td>$0.00</td>
<td>$1,259.15</td>
</tr>
</tbody>
</table>

### Important Messages

*Read Payments: For partial payments that you make to your account, the regular due date in the above table is the date you pay. The balance of a partial payment will be applied to your mortgage.*

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### Springside Mortgage

Confidence Services: 8-009-11-11-22-34
www.springsidemortgage.com

Jordan and Dave Smith
940 Brown Avenue
Memphis, TN 38109

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### Mortgage Statement

Statement Date: 8/30/2015

<table>
<thead>
<tr>
<th>Account Number</th>
<th>Payment Date</th>
<th>Payment Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>1234567</td>
<td>9/7/2015</td>
<td>$1,460.84</td>
</tr>
</tbody>
</table>

### Explanation of Payment Amount

<table>
<thead>
<tr>
<th>Memo (Preferred Payment)</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Principal</td>
<td>$51,936.00</td>
</tr>
<tr>
<td>Interest</td>
<td>$1,259.15</td>
</tr>
<tr>
<td>Existing Taxes and Insurance</td>
<td>$0.00</td>
</tr>
<tr>
<td>Total Payment Amount</td>
<td>$53,195.15</td>
</tr>
</tbody>
</table>

### Account Information

Interest Rate: 5.00%
Prepayment Penalty: 0.00%
Default Rate: 5.50%

### Transaction Activity (7/20 to 8/10)

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
<th>Charges</th>
<th>Payments</th>
</tr>
</thead>
<tbody>
<tr>
<td>7/20/15</td>
<td>Partial Payment Received</td>
<td>$0.00</td>
<td>$1,259.15</td>
</tr>
<tr>
<td>8/1/15</td>
<td>Partial Payment Received</td>
<td>$0.00</td>
<td>$1,259.15</td>
</tr>
<tr>
<td>8/15/15</td>
<td>Late Payment Charged because full payment was received by 8/15/2015</td>
<td>$0.00</td>
<td>$1,259.15</td>
</tr>
</tbody>
</table>

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Bradley
Periodic Billing Statements
Sample Forms
Chapter 12/13 Sample Periodic Statement (continued)

Breakdown of Past Payments

<table>
<thead>
<tr>
<th></th>
<th>Paid Last Month</th>
<th>Paid to Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Principal</td>
<td>$3,000</td>
<td>$8,000</td>
</tr>
<tr>
<td>Interest</td>
<td>$0.00</td>
<td>$6,000</td>
</tr>
<tr>
<td>Taxes (Fire and Insurance)</td>
<td>$0.00</td>
<td>$12,000</td>
</tr>
<tr>
<td>Total</td>
<td>$3,000</td>
<td>$16,000</td>
</tr>
</tbody>
</table>

Important Messages
We have received all of your mortgage payments due since you filed for bankruptcy.
This statement may not show recent payments you sent to the trustee that the trustee has not yet forwarded to us. Please contact your attorney or the trustee if you have questions.
*Partial Payments: Any partial payments listed here are not applied to your mortgage, but instead are held in one or more solid trust accounts. These are held only in an effort to make monthly payments, we will apply those funds to your mortgage.

Summary of Amounts Paid Due Before Bankruptcy Filing (Pre-Petition Amounts)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Past Due Wages</td>
<td>$2,563.65</td>
</tr>
<tr>
<td>Total Paid</td>
<td>$3,888.12</td>
</tr>
<tr>
<td>Current Balance</td>
<td>$11,785.98</td>
</tr>
</tbody>
</table>

Springside Mortgage

Springside Mortgage
P.O. Box 11111
Los Angeles, CA 90010

Payment Amount

<table>
<thead>
<tr>
<th>Payment Date</th>
<th>Payment Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>9/1/2016</td>
<td>$3,565.88</td>
</tr>
<tr>
<td>Addional Principal</td>
<td>$</td>
</tr>
<tr>
<td>Addional Interest</td>
<td>$</td>
</tr>
<tr>
<td>Total Amount</td>
<td>$</td>
</tr>
</tbody>
</table>

If you have not paid your mortgage in full, please refer to your monthly mortgage payment. If you have paid your mortgage in full, please refer to your monthly mortgage payment.

Key Considerations & Takeaways
Borrowers in Bankruptcy
Key Considerations & Takeaways

• Successfully implementing the requirements specific to borrowers in bankruptcy will be a challenge
  ▪ CFPB recognized that, with respect to billing statement requirements:
    o “Servicers and third-party service providers need sufficient time to coordinate, develop, and test systems required to modify periodic statements for consumers in bankruptcy”
    o Servicers “also need sufficient time to train employees regarding the bankruptcy periodic statement requirements”
  ▪ Servicers should begin implementation efforts as soon as possible
    ▪ Map out applicable requirements
    ▪ Conduct gap analyses
    ▪ Evaluate system and technological needs
    ▪ Coordinate with impacted areas of business
  ▪ Monitor for additional CFPB guidance

Questions?

Alexandra Dugan
adugan@bradley.com
615.252.4638

Chris Hawkins
chawkins@bradley.com
205.521.8556

Jonathan Kolodziej
jkolodziej@bradley.com
205.521.8235
Thank You

See below for upcoming webinars in this series.

<table>
<thead>
<tr>
<th>Date</th>
<th>Webinar</th>
</tr>
</thead>
<tbody>
<tr>
<td>October 6, 2016</td>
<td>What You Need to Know: Loss Mitigation</td>
</tr>
<tr>
<td>11:30 AM - 12:30 PM CST</td>
<td>Jonathan Kolodziej, Jason Bushby</td>
</tr>
</tbody>
</table>