

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re: Bank of America Home Affordable
Modification Program (HAMP) Contract
Litigation

No. 1:10-md-02193-RWZ

DECLARATION OF CAROLE RICHTER
IN SUPPORT OF DEFENDANT'S MOTION FOR A PROTECTIVE
ORDER REGARDING CONFIDENTIAL INFORMATION

FILED UNDER SEAL

I, Carole Richter, state as follows:

1. I am Human Resources Manager for Urban Settlement Services, LLC d/b/a Urban Lending Solutions (“Urban Lending”). In this role, I am responsible for, among other things, maintaining the personnel files of Urban Lending’s employees. As part of my job, I have become familiar with the personnel file of Christopher Orris.


2. [REDACTED]

[REDACTED]

3. This Declaration is based upon my personal knowledge, and/or review of business records and information kept in the regular course of Urban Lending Solutions’ business and available to me in the course of my duties at Urban Lending Solutions, as well as information provided to me by Urban Lending Solutions employees.

[Remainder of this page intentionally left blank]

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct this 23rd day of August, 2012.



Carole Richter

CERTIFICATE OF SERVICE

I, James W. McGarry, hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies shall be served by first class mail postage prepaid on all counsel who are not served through the CM/ECF system on August 24, 2012.

/s/ James W. McGarry