

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

NICHOLE WILLIAMS, et al.)	
)	
Plaintiffs,)	
)	
v.)	No. 09-CV-1959 ADM JJG
)	
TIMOTHY F. GEITHNER, et al.)	DECLARATION OF INGRID
)	BECKLES IN SUPPORT OF
)	DEFENDANTS’ OPPOSITION
)	TO PLAINTIFFS’ MOTION
)	FOR A PRELIMINARY
)	INJUNCTION
Defendants.)	

I, Ingrid Beckles, state the following based on my personal knowledge, or review of certain documents:

1. I am the Senior Vice President for Default Asset Management for the Federal Home Loan Mortgage Corporation (“Freddie Mac”). I have held this position since 2003. My job responsibilities include developing and implementing loss mitigation strategies for Freddie Mac, and I have oversight responsibility for Freddie Mac’s Non-Performing Loan servicing. I have been employed by Freddie Mac since 2001.

2. Freddie Mac receives inquiries by telephone, mail and email from and on behalf of homeowners seeking assistance with respect to the Making Home Affordable program (“MHA”), including HAMP.

3. Most inquiries are made, or forwarded, to the following departments or units at Freddie Mac: the toll-free telephone line (1-800-FREDDIE), Corporate Compliance Department, Legal Division, Borrower Outreach Department, Government and Industry Relations Department, or various senior executive officers and Board members.

4. Inquiries can generally be divided into consumer inquiries, which concern issues with specific loans (including a servicer’s evaluation of a loan’s eligibility for HAMP), and non-consumer inquiries, which do not relate to a particular loan but do involve HAMP issues (for example, a complaint regarding a particular servicer’s general compliance with HAMP).

5. To supplement the Homeowner’s HOPE Hotline and the HAMP Support Center, Freddie Mac has procedures intended to appropriately address consumer and non-

consumer inquiries, including those that involve whether a homeowner has received appropriate consideration under HAMP.

6. Freddie Mac's Non-Performing Loans unit's ("NPL") responsibilities include investigating consumer inquiries regarding a servicer's application of Freddie Mac's HAMP guidelines to Freddie Mac loans (other than basic program questions that can be addressed by Freddie Mac's 1-800-FREDDIE process). NPL is empowered to contact servicers directly to determine if they have properly applied HAMP guidelines and, if necessary, instruct servicers to apply the guidelines again. NPL also has the option of applying the HAMP guidelines itself and directing the servicer to correct any mistakes NPL discovered during its independent review. NPL may then inform the borrower regarding the resolution of his or her inquiry, or may direct the servicer to so inform the borrower.

7. In an effort to address certain consumer inquiries, including complaints regarding the misapplication of HAMP guidelines, Freddie Mac recently established the Escalated Case Unit ("ECU"). For these consumer inquiries, the role of ECU is to log the inquiry, ensure the inquiry is directed to the appropriate department at Freddie Mac (including the NPL discussed above)—or the servicer—for investigation, inform (or confirm that the servicer has informed) the borrower regarding the resolution of his or her inquiry, and keep a record of the resolution of the inquiry.

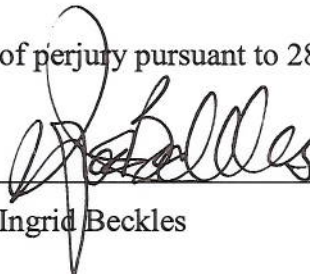
8. If a consumer inquiry does not relate to a Freddie Mac loan, Freddie Mac's review process calls for it to forward the inquiry to Making Home Affordable Compliance at Fannie Mae.

9. Freddie Mac refers non-consumer inquiries involving HAMP to Making Home Affordable Compliance at Treasury.

10. As of August 3, 2009, Freddie Mac has also implemented a "second look" review process intended to further reduce erroneous denials of HAMP applications.

I declare the foregoing under penalty of perjury pursuant to 28 U.S.C § 1746.

Executed on September 16, 2009.



Ingrid Beckles