

In Re: Case No.: 18-16859-CMG
National Management and Preservation Chapter: 11
Services LLC d/b/a National Field Network Judge: Christine M. Gravelle, U.S.B.J.

NOTICE OF PROPOSED COMPROMISE or SETTLEMENT OF CONTROVERSY

National Management and Preservation Services LLC d/b/a National Field Network, the Debtor in this case proposes a compromise, or to settle a claim and/or action as described below. If you object to the settlement or compromise, you must file a written objection with the Clerk of the United States Bankruptcy Court, and serve it on the person named below not later 7 days before the hearing date.

Address of the Clerk: United States Bankruptcy Court
Clarkson S. Fisher US Courthouse
402 East State Street
Trenton, NJ 08608

If an objection is filed, a hearing will be held before the Honorable Christine M. Gravelle, U.S.B.J. on August 7, 2018 at 10:00 a.m. at the United States Bankruptcy Court, courtroom no. 3, Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, NJ 08608 (hearing to be scheduled for at least 28 days from the date of the filing of the notice). If no objection is filed the clerk will enter a *Certification of No Objection* and the settlement may be completed as proposed.

Nature of action: Prior to the Petition Date, the Debtor and Reverse Mortgage Solutions, Inc. ("RMS") entered into a Master Services Agreement ("MSA") wherein the Debtor provided certain services to RMS. Prior to the Petition Date the MSA was terminated. Pursuant to the contract, certain data received by the Debtor during the term of the contract was explicitly identified in that contract as property of RMS. RMS has asserted that if its data is not turned over, it will seek an order compelling the Debtor to turnover its data. The data is presently stored at the Debtor and with a third party.

Pertinent terms of settlement: The Debtor shall authorize the transfer of a copy of the data from the third party and cooperate in the transfer of a copy of the data located on its server as directed by RMS, at RMS's sole cost. RMS will permit the Debtor to retain a complete copy of all of the data at the Debtor's cost. Nothing herein shall waive, affect or alter any and all other claims, causes of action defenses the parties have or may have against one another.

Objections must be served on, and requests for additional information directed to:

Name: Brian L. Baker

Address: Ravin Greenberg, LLC, 24 Commerce Street, Suite 420, Newark, NJ 07102

Telephone No.: (973) 226-1500