

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CYNTHIA STEWART JENKINS,

Plaintiff,

v.

**PHH MORTGAGE CORPORATION
dba PHH MORTGAGE SERVICES and
NEWREZ LLC,**

Defendants.

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Civil Action No. 4:21-cv-1168

UNOPPOSED MOTION TO EXTEND ANSWER DEADLINE

Defendants, PHH Mortgage Corporation d/b/a PHH Mortgage Services, successor by merger to Ocwen Loan Servicing, LLC, and NewRez LLC (“Defendants”), hereby file this *Unopposed Motion to Extend Answer Deadline* (the “Motion”), respectfully stating as follows:

1. Plaintiff filed this lawsuit on April 9, 2021, alleging claims against Defendants for communications and actions that occurred after entry of a bankruptcy discharge order and settlement of a previous lawsuit, and asserting causes of action for violation of the Texas Debt Collection Act, violation of the Fair Debt Collection Practices Act, violation of the bankruptcy discharge injunction, and invasion of privacy. Doc. 1.

2. Defendants seek additional time to prepare their answer in response to Plaintiff’s complaint, until and including May 19, 2021. Plaintiff is not opposed to this extension. This Motion is not being filed for purposes of delay, but in the interest of judicial economy and so that justice may be done. Good cause exists for granting the relief requested. In light of the current status of this matter, Defendants will suffer prejudice if required to abide by the current deadline to answer the complaint.

WHEREFORE, Defendants respectfully request that the Court grant this Motion and enter an order extending the answer deadline in this matter, until and including May 19, 2021. A proposed order is submitted herewith reflecting the new answer deadline.

Respectfully submitted,

/s/ Vincent J. Hess

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Defendants conferred with Plaintiff's counsel on May 3, 2021, regarding the subject of this Motion. Plaintiff is not opposed to the relief sought in this Motion.

/s/ Vincent J. Hess

Vincent J. Hess

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 4th day of May, 2021, a copy of the above and foregoing was served *via ECF* pursuant to the Federal Rules of Civil Procedure to:

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Counsel for Plaintiff

/s/ Vincent J. Hess

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