

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HARRIET NICHOLSON,

Plaintiff,

v.

**BANK OF AMERICA and
COUNTRYWIDE HOME LOANS,
INC.**

Defendants.

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C.A. NO. 3:21-cv-1779-G-BK

**DEFENDANTS BANK OF AMERICA, N.A. AND
COUNTRYWIDE HOME LOANS, INC.'S
MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

Pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, Defendants Bank of America N.A. ("BANA"), improperly named as "Bank of America," and Countrywide Home Bank Loans, Inc. ("CHLI") respectfully request that the Court dismiss in its entirety the Amended Complaint (Doc. 15) filed by Plaintiff Harriet Nicholson. Defendants' Brief in support of this Motion, along with an Appendix, are being concurrently filed herewith.

Dated: September 27, 2021

Respectfully submitted,

By: /s/ Connie Flores Jones
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***ATTORNEYS FOR DEFENDANTS
BANK OF AMERICA, N.A. AND
COUNTRYWIDE HOME LOANS, INC.***

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of September 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system and caused a copy of same to be delivered to pro se Plaintiff Harriet Nicholson via regular U.S. mail and email at the following:

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Pro Se Plaintiff

/s/ Connie Flores Jones
Connie Flores Jones