

Civil Action No. 4:21-cv-2591

4. Defendants expressly reserve the right to identify and call as witnesses additional persons other than those listed below, if, during the course of discovery and investigation relating to this action, Defendants learn that such additional persons have knowledge of relevant matters.

5. These disclosures are made subject to and without limiting any of the foregoing reservations. Defendants make these disclosures in the belief that an appropriate confidentiality order and rational production limitations can and will be agreed upon by counsel at an appropriate time, should they become necessary.

B. Disclosures

1. **The correct names of the parties to the action.** The correct names of the parties to this action are as follows:

- a. Joanna Burke;
- b. John Burke;
- c. Ocwen Loan Servicing, LLC now known as PHH Mortgage Corporation (“PHH”) as the Successor by Merger;
- d. Mark Daniel Hopkins;
- e. Shelley Hopkins; and
- f. Hopkins Law, PLLC.

2. **The name, and if known, address and telephone number of any potential parties to the action.** Defendants are not aware of any additional potential parties to this action.

3. **Rule 26(a)(1)(A)(i).** Defendants believe at present the following individuals have discoverable information about the subject matter of this litigation and may provide testimony that Defendants may use for support in this case:

| <u>Names</u> | <u>Subjects of Information</u> |
|--|---|
| Joanna Burke 46 Kingwood Greens Drive Kingwood, Texas 77339 | Plaintiff has knowledge of the loan, the default in the loan, the foreclosure of the Property, and multiple lawsuits filed by Plaintiff surrounding the Property. |
| John Burke 46 Kingwood Greens Drive Kingwood, Texas 77339 | Plaintiff has knowledge of the loan, the default in the loan, the foreclosure of the Property, and multiple lawsuits filed by Plaintiff surrounding the Property. |
| Ocwen Loan Servicing, LLC now known as PHH Mortgage Corporation ("PHH") as the Successor by Merger c/o Shelley L. Hopkins Mark D. Hopkins Hopkins Law, PLLC 3 Lakeway Centre Ct., Suite 110 Austin, TX 78734 | Knowledge of the Plaintiffs' loan, foreclosure of the Property and litigation history. |

4. **Rule 26(a)(1)(A)(ii).** Defendants' description by category of their Rule 26(a)(1)(A)(ii) disclosures is as follows: Defendants Ocwen/ PHH's business records relating to Plaintiffs' mortgage loan, prior litigation history; all pleadings and documents filed by Plaintiffs in any other action pertaining to the subject loan or property

5. **Rule 26(a)(1)(A)(iii).** Nothing to be disclosed at this time. Defendants' investigation is continuing, and if there are any required disclosures under this category, they will be disclosed via supplementary disclosures under Rule 26(e).

6. **Rule 26(a)(1)(A)(iv).** Nothing to be disclosed at this time. Defendants' investigation is continuing, and if there are any required disclosures under this category, they will be disclosed via supplementary disclosures under Rule 26(e).

Dated: November 23, 2021.

Respectfully submitted,

HOPKINS LAW, PLLC

By: /s/ Mark D. Hopkins
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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of November 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF filing system, and will send a true and correct copy to the following:

VIA CM/RRR # 7021 1970 0000 4526 6637

AND VIA REGULAR MAIL:

John Burke
46 Kingwood Greens Drive
Kingwood, Texas 77339

PRO SE PLAINTIFF

VIA CM/RRR # 7021 1970 0000 4526 6644

AND VIA REGULAR MAIL:

Joanna Burke
46 Kingwood Greens Drive
Kingwood, Texas 77339

PRO SE PLAINTIFF

/s/ Mark D. Hopkins

Mark D. Hopkins