

CAUSE NO. DC-21-12504

<p>HARRIET NICHOLSON,</p> <p><i>Plaintiff,</i></p> <p>v.</p> <p>NATIONSTAR MORTGAGE LLC,</p> <p><i>Defendant.</i></p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>IN THE DISTRICT COURT</p> <p>192nd JUDICIAL DISTRICT</p> <p>DALLAS COUNTY, TEXAS</p>
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PLAINTIFF’S VERIFIED MOTION TO RECUSE JUDGE RAY WHELESS AND KRISTINA WILLIAMS PURSUANT TO TRCP 1, TRCP 18

TO THE COURT:

NOW COMES Harriet Nicholson and files this her timely “Motion to Recuse Judge Ray Wheless and Kristina Williams” and would show unto the Court the following:

Plaintiff’s motion is timely because Ms. Nicholson began to notice the unfairness, bias, prejudice and partiality of the Court as stated infra on November 29, 2021. When a recusal motion is timely filed, Rule 18a leaves a trial judge with no discretion—the trial judge must either recuse himself or refer the motion for another judge to decide. See Rule 18a(c). A timely filed recusal motion triggers the trial judge's duty to recuse or to refer. The trial judge has no such duty when a recusal motion is not timely filed. See Arnold, 853 S.W.2d at 544-45.

Plaintiff's Request to Recuse Senior Judge Wheless from any further proceedings in the pending case pursuant to Texas Rules of Procedure 1, 18(a) and 18(b)

On November 22, 2021, Judge Wheless heard Plaintiff's Motion for Summary Judgment via zoom and rendered judgment, "Denying Plaintiff's Motion for Summary Judgment." in open court. "Judgment is rendered when the trial court officially announces its decision in open court or by written memorandum filed with the clerk." [*S & A Rest. Corp. v. Leal*, 892 S.W.2d 855, 857 \(Tex. 1995\)](#).¹

On November 23, 2021, Plaintiff filed her "Motion for Sanctions."²

On November 24, 2021, Plaintiff filed a "Letter to the Court" asking the Court to enter judgment. "Entry of judgment is a purely ministerial act by which the trial court's judgment is made of record and preserved." [*Skidmore*, 781 S.W.2d at 673](#).³

On November 29, 2021, Plaintiff filed a "Motion to Rule" asking for entry of judgment rendered on November 22, 2021.⁴

On November 22, 2021, Judge Wheless heard six motions in the 192nd District Court; signing three orders, including orders in case DC-21-14655 and

¹ See Ex. A, Dallas County, Texas Court Porals Record Search Dc-21-12504 Harriet Nicholson v. Nationstar Mortgage, LLC

² Id.

³ Id.

⁴ Id.

DC-20-049700 that were scheduled to be heard at 1:30 pm more than three hours after Plaintiff's scheduled hearing.⁵

Upon information and belief, the Court delayed entry of Plaintiff's "entry of judgment" and refused to rule on Plaintiff's Objections to Defendant's evidence orchestrating a calculated scheme with Defendant to allow Defendant an opportunity to file its "Motion to Declare Plaintiff a Vexatious Litigant" to stay the case and deny Plaintiff the opportunity to file a Permissive Appeal; hear Plaintiff's Motion for Sanctions that was filed on November 23, 2021 and scheduled to be heard on December 6, 2021; and rule on Plaintiff's Objections to Defendant's Summary Judgment Evidence in its Amended Response to Plaintiff's Motion for Summary Judgment.

On November 29, 2021 at 2:40 p.m., Tenesa Shaw, 192nd District Court's court reporter, sent Ms. Nicholson and Brenda Hard-Wilson an email, advising the Court would be unavailable on December 6, 2021 to hear her "Motion for Sanctions" however, Ms. Shaw failed to address Defendant's Motion to Exceed that was scheduled the same day at 9:30 a.m. and advising to reschedule Plaintiff's Motion as stated to wit:⁶

⁵ Plaintiff request the Court to take judicial notice of its own records, Plaintiff's Motion to Rule filed on November 29, 2021.

⁶ See Ex. Tenesa Shaw's Email, 11.29.21

DC-21-12504 - Nicholson v Nationstar Mortgage, LLC

From: Tenesa Shaw (tenesa.shaw@dallascounty.org)
To: harrietcholson@yahoo.com; bhard-wilson@mcguirewoods.com
Cc: Veronica.Vaughn@dallascounty.org
Date: Monday, November 29, 2021, 02:40 PM CST

Ms. Nicholson and Ms. Hard-Wilson,

There is a hearing scheduled December 6, 2021, at 10:15 a.m. that needs to be reset.

The Court is unavailable on December 6.

Please call the clerks to reschedule your hearing.

Tenesa Shaw, CSR
Official Court Reporter
192nd District Court
600 Commerce Street, Suite 710-C
Dallas, Texas 75202

On November 29, 2021 at 4:27p.m., Defendant filed “Defendant’s Motion to Declare Plaintiff a Vexatious Litigant.”⁷

⁷ See Ex. A

CAUSE NO. DC-21-12504

HARRIET NICHOLSON,	§	IN THE DISTRICT COURT OF
	§	
<i>Plaintiff,</i>	§	
	§	
vs.	§	DALLAS COUNTY, TEXAS
	§	
NATIONSTAR MORTGAGE LLC,	§	
	§	
<i>Defendant.</i>	§	192nd JUDICIAL DISTRICT

**MOTION TO DECLARE PLAINTIFF
HARRIET NICHOLSON A VEXATIOUS LITIGANT**

On November 30, 2021, Defendant filed its “Notice of Stay”⁸ which stated to wit:

WHEREFORE, pursuant to TEX. CIV. PRAC. & REM. CODE § 11.052(a), this lawsuit is stayed—thereby cancelling all calendared hearings and responses to motions until such time as the Court can hear the November 29, 2021 Motion to Declare Plaintiff Harriet Nicholson a Vexatious Litigant.

On December 2, 2021, after a detailed audit of the docket entries of the instant case, Plaintiff saw Judge Wheless signed an Order Denying Plaintiff’s Motion for Summary Judgment on November 30, 2021 after Defendant filed its Motion to Declare Plaintiff a Vexatious Litigant in violation of Texas Civil Practice and Remedies Code 11.052(a)⁹. However, Judge Wheless refused to rule on

⁸ See Ex. A

⁹ See Harriet Nicholson’s Declaration, paragraph 8.

Plaintiff's Objections to Defendant's Evidence that was filed on November 19, 2021.

Based on the facts supra, Plaintiff questions the impartiality of Judge Wheless and respectfully requests his recusal of any further proceedings in the pending instant case in the interest of justice, fairness, impartiality and due process.

Plaintiff's Request to Recuse Judge Kristina Williams and her Court from any further proceedings in the pending case pursuant to Texas Rules of Prodcuedure 1, 18(a) and 18(b)

On November 18, 2021, Defendant filed its Motion for Leave to Exceed Page Limit and it was scheduled to be heard on December 6, 2021 at 9:30 a.m. (See Ex. A).

On November 23, 2021, Plaintiff filed her "Motion for Sanction" and it was scheduled to be heard on December 6, 2021 at 10:15 a.m.

On November 29, 2021, Tenesa Shaw, 192nd District Court's court reporter, sent Ms. Nicholson an email¹⁰ advising the Court would be unavailable on Decemer 6, 2021 to hear her "Motion for Sanctions" and advising to reschedule as stated to wit:

¹⁰ See Ex. B, Tenesa Shaw's 11.29.21 email

DC-21-12504 - Nicholson v Nationstar Mortgage, LLC

From: Tenesa Shaw (tenesa.shaw@dallascounty.org)
To: harrietcholson@yahoo.com; bhard-wilson@mcguirewoods.com
Cc: Veronica.Vaughn@dallascounty.org
Date: Monday, November 29, 2021, 02:40 PM CST

Ms. Nicholson and Ms. Hard-Wilson,

There is a hearing scheduled December 6, 2021, at 10:15 a.m. that needs to be reset.

The Court is unavailable on December 6.

Please call the clerks to reschedule your hearing.

Tenesa Shaw, CSR
Official Court Reporter
192nd District Court
600 Commerce Street, Suite 710-C
Dallas, Texas 75202

On November 29, 2021, Ms. Shaw exceeded her duties as an official court reporter pursuant to Texas Government Code 52.046 by sending the email advising “Plaintiff’s Motion for Sanctions” should be rescheduled this action does not fall within the court reporter’s duty and responsibilities. Upon information and belief, Ms. Shaw was involved in ex parte communication with Defendant’s counsel because she copied Veronica Vaughn on the email.

On November 29, 2021 at 4:27p.m., Defendant filed “Defendant’s Motion to Declare Plaintiff a Vexatious Litigant.”¹¹

FILED
11/29/2021 4:27 PM
FELICIA PITRE
DISTRICT CLERK
DALLAS CO., TEXAS
Trevia Parker-Ayodele DEPUTY

CAUSE NO. DC-21-12504

HARRIET NICHOLSON,	§	IN THE DISTRICT COURT OF
<i>Plaintiff,</i>	§	
	§	
vs.	§	DALLAS COUNTY, TEXAS
	§	
NATIONSTAR MORTGAGE LLC,	§	
<i>Defendant.</i>	§	192nd JUDICIAL DISTRICT

**MOTION TO DECLARE PLAINTIFF
HARRIET NICHOLSON A VEXATIOUS LITIGANT**

On November 30, 2021, Defendant filed its “Notice of Stay”¹² which stated to wit:

WHEREFORE, pursuant to TEX. CIV. PRAC. & REM. CODE § 11.052(a), this lawsuit is stayed—thereby cancelling all calendared hearings and responses to motions until such time as the Court can hear the November 29, 2021 Motion to Declare Plaintiff Harriet Nicholson a Vexatious Litigant.

On December 1, 2021, Ms. Vaughn, the 192nd District Court Coordinator advised via email,¹³ she added hearings back to the docket in violations of the

¹¹ See Ex. A

¹² Id.

¹³ Ex. C, Veronica Vaughn’s email 12.01.21

automatic stay pursuant Texas Civil Practices and Remedies Code 11.052(a) and after Defendant's "Notice to Stay" to the Court filed on December 1, 2021.

However, the Court intentionally reset Plaintiff's Motion for Sanctions that was previously scheduled to be heard on December 6, 2021 to January 7, 2022 following the hearing of Defendant's Vexatious Litigant motion.

RE: [External Sender]RE: DC-21-12504 Case Closed as per Dallas County, Texas Court portals

From: Veronica Vaughn (veronica.vaughn@dallascounty.org)

To: harrietcholson@yahoo.com; bhard-wilson@mcguirewoods.com

Date: Wednesday, December 1, 2021, 02:49 PM CST

[I have added the hearings back to the docket](#)

[Dec 7th at 11:15 a.m. Motion for Leave](#)

[Jan 7th at 2 p.m. Motion for Sanctions](#)

On December 1, 2021, Ms. Vaughn's email¹⁴ advised, "Counsel, please contact the Court clerk at 214-653-7748 to schedule a hearing on the Motion Vexatious Litigant" violating the Texas Government. This conduct violates Section 81.101 of the Texas Government Code- advancing legal advice (Recommends a

¹⁴ Ex. D, Veronica Vaughn's email 12.01.21

specific course of conduct a person should take in an actual or potential legal proceeding)¹⁵ :

RE: [External Sender]RE: DC-21-12504 Case Closed as per Dallas County, Texas Court portals

From: Veronica Vaughn (veronica.vaughn@dallascounty.org)

To: harrietcholson@yahoo.com; bhard-wilson@mcguirewoods.com

Date: Wednesday, December 1, 2021, 04:19 PM CST

All,

Per the Court,

The hearing regarding page limits stays since it is related to the motion to declare vexatious litigant.

However, the sanctions hearing is cancelled and can be rescheduled after the vexatious litigant hearing.

Counsel, please contact the court clerk at 214-653-7748 to schedule a hearing on the Motion Vexatious Litigant

Ms. Vaughn's email proves the Court was providing the Defendant to have its "Motion for Leave" to be heard before "Defendant's Motion for Vexatious Litigant" was heard and "Plaintiff's Motion for Sanctions" would be **cancelled and can be rescheduled after the vexatious litigant hearing in violation of the automatic** stay pursuant to TCPRC 11.052(a).¹⁶

The Court's hearing any motions in violation of the automatic stay imposed under Texas Civil Practices and Remedies Code 11.052 would be void.

¹⁵ Plaintiff request the Court to take judicial notice of [Legal Information vs \(txcourts.gov\)](https://www.txcourts.gov).

¹⁶

Based on the facts supra, Judge Kristina Williams' Court has shown bias and have chosen to violate the automatic stay to the Defendant's advantage. Plaintiff questions the impartiality of Judge Kristina Williams and her Court.

Plaintiff requests Judge Williams recusal, transfer the instant case to a different Court in the the interest of justice, fairness, and due process.

PRAYER

Plaintiff prays Judge Wheless and Judge Williams recused themselves from the instant case and assign the case to a different court in the interest of justice, fairness, impartiality, and due process and any other relief Plaintiff is justly entitled.

Respectfully submitted,
/s/ Harriet Nicholson
Harriet Nicholson
2951 Sants Sabina Drive
Grand Prairie, Texas 75052
817-217-0245
harrietnicholson@yahoo.com

VERIFICATION


I verify and declare I have prepared and reviewed Plaintiff's Motion to Recuse Judge Wheless and Judge Williams and concludes that every factual statement in the motion is true and correct to the best of my knowledge, supported by competent evidence attached to Harriet Nicholson's Declaration to support Plaintiff's Motion to Recuse Judge Wheless and Jusge Williams and all records

attached to Harriet Nicholson's Declaration is true and correct copies of the original documents.

/s/ Harriet Nicholson 

My name is Harriet Nicholson. My date of birth is October 7, 1966 and my address is 2951 Santa Sabina Drive. Grand Prairie, Texas 75052 in Tarrant County, Texas in the United States of America. I declare under penalty of perjury that the foregoing is true and correct, based on personal knowledge and all exhibits attached and referenced are true and correct copies of the original documents.

Executed in Tarrant County, State of Texas on the 5th day December 5, 2021


/s/ Harriet Nicholson
Declarant

CERTIFICATE OF SERVICE

On December 5, 2021, I certify I served all counsel of record pursuant to Texas Rules of Civil Procedure.

/s/ Harriet Nicholson

<p>HARRIET NICHOLSON, <i>Plaintiff,</i> v. NATIONSTAR MORTGAGE LLC, <i>Defendant.</i></p>	<p>§ § § § § § § § § §</p>	<p>IN THE DISTRICT COURT 192nd JUDICIAL DISTRICT DALLAS COUNTY, TEXAS</p>
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Harriet Nicholson’s Declaration to Support Plaintiff’s Motion to Recuse Judge Wheless and Judge Williams

1. On September 7, 2021, I filed case DC-21-12504 under the Texas Declaratory Judgment Act collaterally attacking a void judgment rendered in the 48th District Court for lack of jurisdiction. (Ex. A)
2. On September 7, 2021, the only issue I had before the Court is to vacate the void judgment for lack of jurisdiction from the 48th District Court.
3. On November 22, 2021, I attended a hearing via zoomm on “Plaintiff’s Motion for Summary Judgment” whereby Judge Wheless announced he was denying the “Plaintiff’s Motion for Summary Judgment.”(Ex. A)
4. On November 23, 2021, I filed a “Motion for Sanctions” against Defendant. (Ex. A)
5. On November 29, 2021 at 2:47 p.m., I received an email from Tenesa Shaw, Court Reporter, advising the Court was unavailable on December 6, 2021 at 10:15 a.m.(Ex. B)

6. On November 29, 2021 at 4:17p.m., I was served Defendant's Motion to Declare Plaintiff a Vexatious Litigant.(Ex. A)
7. On November 29, 2021, I filed a Motion to Rule on Plaintiff's Motion For Summary Judgment, Motion to Strike, and Plaintiff's Objections to Defendant's Evidence to support its Amended Response to Plaintiff's Motion for Summary Judgment.(Ex. A)
8. On November 29, 2021, I began to notice the bias, prejudice, and partiality of Judge Wheless, Tenesa Shaw, Veronica Vaughn, and Judge Williams Court from the actions taken by the Court between November 29, 2021 - December 1, 2021.
9. On November 30, 2021, I was served a "Notice of Stay" advising all calendared hearings were cancelled.(Ex. A)
10. On December 1, 2021, 2:41 p.m., I received an email from Veronica Vaughn advising, "I have added the hearings back to the docket.(Ex.C)
11. On December 1, 2021, 4:19 p.m., I received an email from Veronica Vaughn, advising Defendant's Motion to Exceed would be heard, however, Plaintiff's Motion for Sanctions would be cancelled and can be scheduled after the vexatious litigant motion. (Ex. D)

12. On December 2, 2021, I audited the docket entries of the instant case and saw an order entered by Judge Wheless “Denying Plaintiff’s Motion for Summary Judgment.”, (Ex. A)

My name is Harriet Nicholson. My date of birth is October 7, 1966 and my address is 2951 Santa Sabina Drive. Grand Prairie, Texas 75052 in Tarrant County, Texas in the United States of America. I declare under penalty of perjury that the foregoing is true and correct, based on personal knowledge and all exhibits attached are true and correct copies of the original documents.

Executed in Tarrant County, State of Texas on the 5th day December 5, 2021

/s/ Harriet Nicholson
Declarant

EX. A

(DC-21-12504 192ND DISTRICT COURT DOCKET ENTRIES)

Case Information

DC-21-12504 | HARRIET NICHOLSON vs. NATIONSTAR MORTGAGE, LLC

Case Number
DC-21-12504
File Date
09/07/2021

Court
192nd District Court
Case Type
OTHER (CIVIL)

Judicial Officer
WILLIAMS, KRISTINA M
Case Status
INACTIVE

Party

PLAINTIFF
NICHOLSON, HARRIET

Address
2951 SANTA SABINA DRIVE
GRAND PRARIE TX 75052

Active Attorneys ▼
Pro Se

DEFENDANT
NATIONSTAR MORTGAGE, LLC

Address
BY SERVING ITS REGISTERED AGENT, CORPORATION SERVICE
COMPANY
211 E. 7TH STREET
SUITE 620
DALLAS TX 78701-3218

Active Attorneys ▼
Attorney
SUTTON, HEATHER N
Retained

Lead Attorney
HARD-WILSON, BRENDA A.
Retained

Events and Hearings

09/07/2021 NEW CASE FILED (OCA) - CIVIL
09/07/2021 ORIGINAL PETITION ▼ ORIGINAL PETITION
09/09/2021 AMENDED PETITION ▼ AMENDED PETITION FOR DECLARATORY JUDGMENT
09/09/2021 REQUEST FOR SERVICE ▼ REQUEST FOR SERVICE
09/09/2021 ISSUE CITATION
09/13/2021 REQUEST FOR SERVICE ▼ REQUEST
09/13/2021 ISSUE CITATION ▼ ISSUE CITATION - NATIONSTAR MORTGAGE, LLC ISSUE CITATION - NATIONSTAR MORTGAGE, LLC Comment ORIGINAL/AMENDED
09/15/2021 CITATION ▼ Unserviced Anticipated Server ESERVE Anticipated Method Comment NATIONSTAR MORTGAGE, LLC
09/15/2021 CITATION ▼ Unserviced Anticipated Server CERTIFIED MAIL Anticipated Method Comment NATIONSTAR MORTGAGE,LLC

09/21/2021 ISSUE CITATION ▼

ISSUE CITATION - NATIONSTAR MORTGAGE, LLC

Comment
AMENDED

09/21/2021 ISSUE CITATION ▼

ISSUE CITATION - NATIONSTAR MORTGAGE, LLC

Comment
AMENDED - CERT MAIL - 9214 8901 0661 5400 0167 0365 80

09/22/2021 CITATION ▼

Return Unserved
09/23/2021

Anticipated Server
CERTIFIED MAIL

Anticipated Method
Actual Server
CERTIFIED MAIL

Returned
09/23/2021

Comment
NATIONSTAR MORTGAGE, LLC

09/23/2021 RETURN OF SERVICE ▼

RETURN OF SERVICE - NATIONSTAR MORTGAGE, LLC

Comment
EXECUTED CITATION - NATIONSTAR MORTGAGE, LLC - CERT MAIL

09/23/2021 CITATION ▼

Served
09/27/2021

Anticipated Server
CERTIFIED MAIL

Anticipated Method
Actual Server
CERTIFIED MAIL

Returned
09/28/2021

Comment
REISSUE - NATIONSTAR MORTGAGE, LLC

09/27/2021 RETURN OF SERVICE ▼

RETURN OF SERVICE - NATIONSTAR MORTGAGE, LLC

Comment

EXECUTED CITATION - NATIONSTAR MORTGAGE, LLC - CERT MAIL

10/11/2021 MOTION - RETAIN ▼

MOTION - RETAIN

10/11/2021 NON-SIGNED PROPOSED ORDER/JUDGMENT ▼

PROPOSED ORDER TO RETAIN

Comment

TO RETAIN

10/14/2021 ORIGINAL ANSWER - GENERAL DENIAL ▼

ORIGINAL ANSWER

10/26/2021 SCHEDULING ORDER ▼

SCHEDULING ORDER

Comment

- UNIFORM / LEVEL 2

10/27/2021 SCHEDULING ORDER ▼

AMENDED SCHEDULING ORDER

Comment

AMENDED - LEVEL 2

10/27/2021 MISCELLANEOUS EVENT ▼

REQUEST TAKE JUDICIAL NOTICE-PLAINTIFF

Comment

REQUEST TAKE JUDICIAL NOTICE

10/28/2021 MOTION - SUMMARY JUDGMENT ▼

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

11/01/2021 DISMISSAL FOR WANT OF PROSECUTION ▼

192 DWOPNO ACTION Notice

Hearing Time

9:00 AM

Cancel Reason

REQUESTED BY ATTORNEY/PRO SE

11/01/2021 Non Jury Trial ▼

192nd Cover Letter

192nd Cover Letter

192ND TRIAL RESET LETTER NON-JURY

192ND TRIAL RESET LETTER NON-JURY

Judicial Officer

WILLIAMS, KRISTINA M

Hearing Time

9:00 AM

Cancel Reason

BY COURT ADMINISTRATOR

11/01/2021 NOTICE OF HEARING / FIAT ▼

ZOOM - PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Comment

- ZOOM CONFERENCE - ON PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

11/04/2021 NON-SIGNED PROPOSED ORDER/JUDGMENT ▼

PROPOSED ORDER TRADITIONAL SUMMARY JUDGMENT/DECLARATORY JUDGMENT

Comment

PROPOSED TRADITIONAL SUMMARY JUDGMENT/DECLARATORY JUDGMENT

11/12/2021 NOTICE OF APPEARANCE ▼

NOTICE OF APPEARANCE

11/12/2021 RESPONSE ▼

RESPONSE/IN OPPOSITION/PLAINTIFF SUMMARY JUDGMENT-DEFENDANT

Comment

IN OPPOSITION/PLAINTIFF SUMMARY JUDGMENT-DEFENDANT

11/15/2021 RESPONSE ▼

RESPONSE/AMD RESPONSE/OPPOSITION/PLTF SUMMARY JUDGMENT-DEFENDANT

Comment

AMENDED RESPONSE/IN OPPOSITION/PLAINTIFF SUMMARY JUDGMENT-DEFENDANT

11/15/2021 NON-SIGNED PROPOSED ORDER/JUDGMENT ▼

PROPOSED ORDER DENYING PLAINTIFF SUMMARY JUDGMENT

Comment

PROPOSED ORDER DENYING PLAINTIFF SUMMARY JUDGMENT

11/17/2021 MOTION - LEAVE ▼

DEFENDANT OPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT

Comment

- OPPOSED / TO EXCEED PAGE LIMIT

11/17/2021 NON-SIGNED PROPOSED ORDER/JUDGMENT ▼

PROPOSED ORDER - GRANTING LEAVE TO EXCEED PAGE LIMIT

Comment

- GRANTING LEAVE TO EXCEED PAGE LIMIT

11/18/2021 MOTION - LEAVE ▼

DEFENDANT'S OPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT TO DECLARE PLAINTIFF A VEXATIOUS LITIGANT

Comment

- OPPOSED / EXCEED PAGE LIMIT / DECLARE PLAINTIFF A VEXATIOUS LITIGANT

11/18/2021 NON-SIGNED PROPOSED ORDER/JUDGMENT ▼

PROPOSED ORDER - OPPOSED LEAVE TO EXCEED PAGE LIMIT TO DECLARE PLAINTIFF A VEXATIOUS LITIGANT

Comment

- OPPOSED LEAVE / EXCEED PAGE LIMIT / DECLARE PLAINTIFF A VEXATIOUS LITIGANT

11/19/2021 MOTION - STRIKE ▼

PF MOTION STRIKE DEF AMENDED RESP TO PF'S MSJ AND PF'S RESPONSE AND OBJ TO DEF AMENDED RESPONSE

Comment

DEFENDANT'S AMENDED RESPONSE TO PLAINTIFF'S MSJ AND PLAINTIFF'S RESPONSE AND OBJECTIONS TO DEFENDANT'S AMEDNED RESP

11/22/2021 Motion - Summary Judgment ▼

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

ZOOM - PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

RESPONSE/IN OPPOSITION/PLAINTIFF SUMMARY JUDGMENT-DEFENDANT

RESPONSE/AMD RESPONSE/OPPOSITION/PLTF SUMMARY JUDGMENT-DEFENDANT

PROPOSED ORDER DENYING PLAINTIFF SUMMARY JUDGMENT

Judicial Officer

WILLIAMS, KRISTINA M

Hearing Time

10:15 AM

Comment

30 MINS - P/MSJ FILED 10/28/2021 - (VIA ZOOM) - SET BY HARRIET NICHOLSON - 817-217-0245 zoom link 970 1001 1832 sent 11/17

11/22/2021 RESPONSE ▼

RESPONSE/SUPPLEMENTAL REPLY/DEF AMENDED RESPONSED/PLTF SUMMARY JUDGMENT-PLAINTIFF

Comment

PLAINTIFF/SUPPLEMENTAL REPLY/DEFENDANTS AMENDED RESPONSE/PLAINTIFF SUMMARY JUDGMENT

11/22/2021 NON-SIGNED PROPOSED ORDER/JUDGMENT ▼

ORDER ON PLAINTIFF'S MSJ

Comment

ORDER ON PLAINTIFF'S MSJ

11/22/2021 NOTICE OF HEARING / FIAT ▼

NOTICE OF HEARING RE: MOTION FOR LEAVE

Comment

RE: MOTION FOR LEAVE

11/23/2021 MOTION - SANCTIONS ▼

MOTION FOR SANCTIONS

11/23/2021 NON-SIGNED PROPOSED ORDER/JUDGMENT ▼

PROPOSED ORDER PLTF MOTION FOR SANCTIONS.pdf

Comment

ORDER GRANTING PLAINTIFF HARRIET NICHOLSON MOTION FOR SANCTIONS

11/23/2021 NOTICE OF HEARING / FIAT ▼

NOTICE HEARING/SANCTIONS

Comment

SANCTIONS

11/24/2021 CORRESPONDENCE - LETTER TO FILE ▼

REQUESTING A DECISION ON PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Comment

- REQUESTING A DECISION ON PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

11/29/2021 NON-SIGNED PROPOSED ORDER/JUDGMENT ▼

PROPOSED ORDER/MOTION RULE./STRIKE DEF/AMENDED RESPONSE/RULE/PLTF
OBJECTIONS/EVIDENCE

Comment

PROPOSED MOTION RULE/STRIKE DEFENDANTS AMENDED RESPONSE/RULING PLAINTIFFS
OBJECTIONS DEFENDANTS EVIDENCE

11/29/2021 RESPONSE ▼

RESPONSE/DEF/LEAVE EXCEED PAGE LIMIT-PLAINTIFF

Comment

TO DEFEFENDANT LEAVE/EXCEED PAGE LIMIT-PLAINTIFF

11/29/2021 WITNESS LIST ▼

WITNESS LIST/12-6-21/SANCTIONS-PLAINTIFF

Comment

12-6-21/SANCTIONS-PLAINTIFF

11/29/2021 EXHIBIT LIST ▼

EXHBIT LIST/12-6-21/SANCTIONS HEARING-PLAINTIFF

Comment

12-6-21/SANCTION HEARING-PLAINTIFF

11/29/2021 MOTION - MISCELLANOUS ▼

PLAINTIFF'S MOTION TO RULE

Comment

- RULE ON MOTION FOR SUMMARY JUDGMENT

11/29/2021 NOTICE OF HEARING / FIAT ▼

NOTICE OF HEARING - MOTION TO RULE

Comment

MOTION TO RULE

11/29/2021 NON-SIGNED PROPOSED ORDER/JUDGMENT ▼

11.29.21 PROPOSED ORDER GRANTING PLTF'S MOTION TO RULE_STRIKE_OBJ TO EVIDENCE.pdf

Comment

PROPOSED ORDER - GRANTING PLAINTIFF'S MOTION TO RULE ON MOTION FOR SUMMARY
JUDGMENT

11/29/2021 NOTICE OF HEARING / FIAT ▼

NOTICE HEARING/SANCTIONS

Comment

SANCTIONS

11/29/2021 MOTION - MISCELLANEOUS ▼

MOTION DECLARE/HARRIET NICHOLSON/VEXATIOUS LITIGANT-DEFENDANT

Comment

DECLARE/HARRIET NICHOLSON/VEXATIOUS LITIGANT

11/30/2021 MOTION - ENTER ORDER ▼

MOTION ENTER ORDER-PLAINTIFF

Comment

PLAINTIFF

11/30/2021 NOTICE OF HEARING / FIAT ▼

NOTICE HEARING/AMENDED NOTICE HEARING/ LEAVE EXCEED/AMENDED VEXATIOUS LITIGANT

Comment

AMENDED NOTICE HEARING/LEAVE EXCEED/AMENDED VEXATIOUS LITIGANT

11/30/2021 ORDER - DENY ▼

ORDER - DENY - PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Comment

- PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

11/30/2021 MOTION - STAY ▼

DEFENDANT'S NOTICE OF STAY PROCEEDINGS

Comment

- NOTICE / PROCEEDINGS

11/30/2021 INACTIVATE CASE (OCA)

12/01/2021 NON-SIGNED PROPOSED ORDER/JUDGMENT ▼

PROPOSED ORDER DECLARE/HARRIET NICHOLSON/VEXATIOUS LITIGANT

Comment

DEFENDANT/DECLARE PLAINTIFF HARRIET NICHOLSON/VEXATIOUS LITIGANT

12/02/2021 MOTION HEARING ▼

REQUESTING A DECISION ON PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

PROPOSED ORDER/MOTION RULE./STRIKE DEF/AMENDED RESPONSE/RULE/PLTF
OBJECTIONS/EVIDENCE

PLAINTIFF'S MOTION TO RULE

NOTICE OF HEARING - MOTION TO RULE

Judicial Officer
SMITH, CRAIG

Hearing Time
9:00 AM

Cancel Reason
REQUESTED BY JUDGE

Comment
15 MINS - P/M/RULE FILED 11/29/21 - (IN PERSON) - SET BY HARRIET NICHOLSON - 817-217-0245

12/07/2021 Motion - Leave ▼

PROPOSED ORDER - OPPOSED LEAVE TO EXCEED PAGE LIMIT TO DECLARE PLAINTIFF A
VEXATIOUS LITIGANT

DEFENDANT'S OPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT TO DECLARE PLAINTIFF A
VEXATIOUS LITIGANT

NOTICE OF HEARING RE: MOTION FOR LEAVE

RESPONSE/DEF/LEAVE EXCEED PAGE LIMIT-PLAINTIFF

NOTICE HEARING/AMENDED NOTICE HEARING/ LEAVE EXCEED/AMENDED VEXATIOUS LITIGANT

Judicial Officer
WILLIAMS, KRISTINA M

Hearing Time
10:15 AM

Cancel Reason
CASE CLOSED

Comment
30 MINS - D/M/LEAVE FILED 11/18/21 - (VIA ZOOM) - SET BY CINDY BOYD - 704-560-3008 zoom link
sent 11/22 to Cindy Boyd

01/07/2022 Motion - Sanctions ▼

MOTION FOR SANCTIONS

PROPOSED ORDER PLTF MOTION FOR SANCTIONS.pdf

NOTICE HEARING/SANCTIONS

PLAINTIFF'S MOTION TO RULE

NOTICE HEARING/SANCTIONS

MOTION ENTER ORDER-PLAINTIFF

Judicial Officer
WILLIAMS, KRISTINA M

Hearing Time
1:00 PM

Cancel Reason
CASE CLOSED

Comment

30 MINS - P/M/SANCTIONS FILED 11/23/21 - (VIA ZOOM) - SET BY HARRIET NICHOLSON - 817-217-0245; PL MTN ENTER ORDER FILED 11/30/2021; PL MNT RULE ON MSJ FILED 11/29/2021 (VIA ZOOM) HARREIT NICHOLSON 817-217-0245

11/14/2022 Non Jury Trial ▼

192ND TRIAL RESET LETTER NON-JURY

192ND TRIAL RESET LETTER NON-JURY

Judicial Officer

WILLIAMS, KRISTINA M

Hearing Time

9:00 AM

Cancel Reason

CASE CLOSED

Financial

NICHOLSON, HARRIET

Total Financial Assessment	\$392.00
Total Payments and Credits	\$392.00

9/9/2021	Transaction Assessment			\$292.00
9/9/2021	CREDIT CARD - TEXFILE (DC)	Receipt # 59312-2021-DCLK	NICHOLSON, HARRIET	(\$292.00)
9/13/2021	Transaction Assessment			\$8.00
9/13/2021	CREDIT CARD - TEXFILE (DC)	Receipt # 60754-2021-DCLK	NICHOLSON, HARRIET	(\$8.00)
9/14/2021	Transaction Assessment			\$8.00
9/14/2021	CREDIT CARD - TEXFILE (DC)	Receipt # 61104-2021-DCLK	NICHOLSON, HARRIET	(\$8.00)
9/21/2021	Transaction Assessment			\$76.00
9/21/2021	PAYMENT (CASE FEES)	Receipt # 63277-2021-DCLK	NICHOLSON, HARRIET	(\$76.00)
9/21/2021	Transaction Assessment			\$8.00
9/21/2021	PAYMENT (CASE FEES)	Receipt # 63285-2021-	NICHOLSON,	(\$8.00)

DC-21-12504 PLAINTIFF'S MOTION TO RECUSE JUDGE RAY WHELESS AND JUDGE KRISTINA WILLIAMS

Documents

ORIGINAL PETITION
AMENDED PETITION FOR DECLARATORY JUDGMENT
REQUEST FOR SERVICE
REQUEST
ISSUE CITATION - NATIONSTAR MORTGAGE, LLC
ISSUE CITATION - NATIONSTAR MORTGAGE, LLC
ISSUE CITATION - NATIONSTAR MORTGAGE, LLC
ISSUE CITATION - NATIONSTAR MORTGAGE, LLC
RETURN OF SERVICE - NATIONSTAR MORTGAGE, LLC
RETURN OF SERVICE - NATIONSTAR MORTGAGE, LLC
192 DWOPNO ACTION Notice
PROPOSED ORDER TO RETAIN
MOTION - RETAIN
ORIGINAL ANSWER
192nd Cover Letter
192nd Cover Letter
192ND TRIAL RESET LETTER NON-JURY
192ND TRIAL RESET LETTER NON-JURY
SCHEDULING ORDER
192ND TRIAL RESET LETTER NON-JURY
192ND TRIAL RESET LETTER NON-JURY
AMENDED SCHEDULING ORDER
REQUEST TAKE JUDICIAL NOTICE-PLAINTIFF
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT
ZOOM - PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT
PROPOSED ORDER TRADITIONAL SUMMARY JUDGMENT/DECLARATORY JUDGMENT
NOTICE OF APPEARANCE
RESPONSE/IN OPPOSITION/PLAINTIFF SUMMARY JUDGMENT-DEFENDANT
RESPONSE/AMD RESPONSE/OPPOSITION/PLTF SUMMARY JUDGMENT-DEFENDANT
PROPOSED ORDER DENYING PLAINTIFF SUMMARY JUDGMENT

DEFENDANT OPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT
PROPOSED ORDER - GRANTING LEAVE TO EXCEED PAGE LIMIT
PROPOSED ORDER - OPPOSED LEAVE TO EXCEED PAGE LIMIT TO DECLARE PLAINTIFF A
VEXATIOUS LITIGANT
DEFENDANT'S OPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMIT TO DECLARE PLAINTIFF A
VEXATIOUS LITIGANT
PF MOTION STRIKE DEF AMENDED RESP TO PF'S MSJ AND PF'S RESPONSE AND OBJ TO DEF
AMENDED RESPONSE
RESPONSE/SUPPLEMENTAL REPLY/DEF AMENDED RESPONSED/PLTF SUMMARY JUDGMENT-
PLAINTIFF
ORDER ON PLAINTIFF'S MSJ
NOTICE OF HEARING RE: MOTION FOR LEAVE
MOTION FOR SANCTIONS
PROPOSED ORDER PLTF MOTION FOR SANCTIONS.pdf
NOTICE HEARING/SANCTIONS
REQUESTING A DECISION ON PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT
PROPOSED ORDER/MOTION RULE./STRIKE DEF/AMENDED RESPONSE/RULE/PLTF
OBJECTIONS/EVIDENCE
RESPONSE/DEF/LEAVE EXCEED PAGE LIMIT-PLAINTIFF
WITNESS LIST/12-6-21/SANCTIONS-PLAINTIFF
EXHBIT LIST/12-6-21/SANCTIONS HEARING-PLAINTIFF
PLAINTIFF'S MOTION TO RULE
NOTICE OF HEARING - MOTION TO RULE
11.29.21 PROPOSED ORDER GRANTING PLTF'S MOTION TO RULE_STRIKE_OBJ TO EVIDENCE.pdf
NOTICE HEARING/SANCTIONS
MOTION DECLARE/HARRIET NICHOLSON/VEXATIOUS LITIGANT-DEFENDANT
PROPOSED ORDER DECLARE/HARRIET NICHOLSON/VEXATIOUS LITIGANT
MOTION ENTER ORDER-PLAINTIFF
NOTICE HEARING/AMENDED NOTICE HEARING/ LEAVE EXCEED/AMENDED VEXATIOUS LITIGANT
ORDER - DENY - PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT
DEFENDANT'S NOTICE OF STAY PROCEEDINGS

EX. B

**(TENESA SHAW'S 192ND DISTRICT
COURT REPORTER'S EMAIL)**

RE: [External Sender]Re: DC-21-12504 - Nicholson v Nationstar Mortgage, LLC

From: Tenesa Shaw (tenesa.shaw@dallascounty.org)
To: harrietnicholson@yahoo.com; bhard-wilson@mcguirewoods.com
Cc: Veronica.Vaughn@dallascounty.org
Date: Monday, November 29, 2021, 03:39 PM CST

Yes. The Court is unavailable on December 6.

Tenesa Shaw, CSR

Official Court Reporter

192nd District Court

600 Commerce Street, Suite 710-C

Dallas, Texas 75202

214-653-7766

From: Harriet Nicholson <harrietnicholson@yahoo.com>
Sent: Monday, November 29, 2021 3:38 PM
To: bhard-wilson@mcguirewoods.com; Tenesa Shaw <Tenesa.Shaw@dallascounty.org>
Cc: Veronica Vaughn <Veronica.Vaughn@dallascounty.org>
Subject: [External Sender]Re: DC-21-12504 - Nicholson v Nationstar Mortgage, LLC

:30Ms. Shaw,

Is the Court unavailable for the meeting scheduled for Defendant's Motion to be heard at 9:30am the same day as well?

On Monday, November 29, 2021, 02:40:37 PM CST, Tenesa Shaw <tenesa.shaw@dallascounty.org> wrote:

Ms. Nicholson and Ms. Hard-Wilson,

There is a hearing scheduled December 6, 2021, at 10:15 a.m. that needs to be reset.

The Court is unavailable on December 6.

Please call the clerks to reschedule your hearing.

Tenesa Shaw, CSR

Official Court Reporter

192nd District Court

600 Commerce Street, Suite 710-C

Dallas, Texas 75202

214-653-7766

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EX. C

**(VERONICA VAUGHAN'S 192ND
DISTRICT COURT'S COURT
COORDINATOR EMAIL 1)**

RE: [External Sender]RE: DC-21-12504 Case Closed as per Dallas County, Texas Court portals

From: Veronica Vaughn (veronica.vaughn@dallascounty.org)

To: harrietcholson@yahoo.com; bhard-wilson@mcguirewoods.com

Date: Wednesday, December 1, 2021, 02:49 PM CST

I have added the hearings back to the docket

Dec 7th at 11:15 a.m. Motion for Leave

Jan 7th at 2 p.m. Motion for Sanctions

From: Harriet Nicholson <harrietcholson@yahoo.com>

Sent: Wednesday, December 1, 2021 2:41 PM

To: Veronica Vaughn <Veronica.Vaughn@dallascounty.org>; Brenda A. Hard-Wilson <bhard-wilson@mcguirewoods.com>

Subject: [External Sender]RE: DC-21-12504 Case Closed as per Dallas County, Texas Court portals

Dear Ms. Vaughn,

The case information on the Dallas County, Texas Court portals indicates the case is closed. Understandably the case is stayed due to the Defendant filing a Motion To Declare Vexatious Litigant filed on November 30, 2021. However, pursuant to Sec. 11.053 the court shall, conduct a hearing to determine whether to grant the motion. I respectfully request an evidential hearing as per 11.053 before the Court make a determination on the Motion to Declare Plaintiff a Vexatious Litigant.

Thanks for your consideration,

Harriet Nicholson, Plaintiff

Sec. 11.053. HEARING. (a) On receipt of a motion under Section [11.051](#), the court shall, after notice to all parties, conduct a hearing to determine whether to grant the motion.

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EX. D

**(VERONICA VAUGHAN'S 192ND
DISTRICT COURT'S COURT
COORDINATOR EMAIL 2)**

RE: [External Sender]RE: DC-21-12504 Case Closed as per Dallas County, Texas Court portals

From: Veronica Vaughn (veronica.vaughn@dallascounty.org)

To: harrietcholson@yahoo.com; bhard-wilson@mcguirewoods.com

Date: Wednesday, December 1, 2021, 04:19 PM CST

All,

Per the Court,

The hearing regarding page limits stays since it is related to the motion to declare vexatious litigant.

However, the sanctions hearing is cancelled and can be rescheduled after the vexatious litigant hearing.

Counsel, please contact the court clerk at 214-653-7748 to schedule a hearing on the Motion Vexatious Litigant

From: Harriet Nicholson <harrietcholson@yahoo.com>

Sent: Wednesday, December 1, 2021 2:41 PM

To: Veronica Vaughn <Veronica.Vaughn@dallascounty.org>; Brenda A. Hard-Wilson <bhard-wilson@mcguirewoods.com>

Subject: [External Sender]RE: DC-21-12504 Case Closed as per Dallas County, Texas Court portals

Dear Ms. Vaughn,

The case information on the Dallas County, Texas Court portals indicates the case is closed. Understandably the case is stayed due to the Defendant filing a Motion To Declare Vexatious Litigant filed on November 30, 2021. However, pursuant to Sec. 11.053 the court shall, conduct a hearing to determine whether to grant the motion. I respectfully request an evidential hearing as per 11.053 before the Court make a determination on the Motion to Declare Plaintiff a Vexatious Litigant.

Thanks for your consideration,

Harriet Nicholson, Plaintiff

Sec. 11.053. HEARING. (a) On receipt of a motion under Section [11.051](#), the court shall, after notice to all parties, conduct a hearing to determine whether to grant the motion.

Automated Certificate of eService

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Envelope ID: 59717587
Status as of 12/7/2021 10:14 AM CST

Associated Case Party: NATIONSTAR MORTGAGE, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Heather Sutton	24072378	hsutton@mcguirewoods.com	12/5/2021 3:28:14 PM	SENT
Brenda Hard-Wilson		bhard-wilson@mcguirewoods.com	12/5/2021 3:28:14 PM	SENT

Associated Case Party: HARRIET NICHOLSON

Name	BarNumber	Email	TimestampSubmitted	Status
Harriet Nicholson		harrietnicholson@yahoo.com	12/5/2021 3:28:14 PM	SENT
Harriet Nicholson		save.my.home.in.2013@gmail.com	12/5/2021 3:28:14 PM	SENT
Harriet Nicholson		nich.district@gmail.com	12/5/2021 3:28:14 PM	SENT