## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

JOHN GLENN GUTHRIE,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
OCWEN LOAN SERVICING, LLC,	§ CIVII ACTIO	ON NO. 5:21-CV-01291
REALHOME SERVICES AND	§ CIVIL ACTION	JN NO. 5:21-C v -01291
SOLUTIONS, INC., ALTISOURCE,	§	
PREMIUM TITLE SERVICES – TEXAS	§	
TITLE; HUBZU.COM; DOES 1-50,	§	
	§	
Defendants.	§	

# MOTION TO ALLOW SHAWNIKA L. HARRIS TO WITHDRAW AND SUBSTITUTION OF COUNSEL

Defendant PHH Mortgage Corporation, successor by merger to Ocwen Loan Servicing, LLC ("Defendant" or "PHH") files this Motion to Allow Shawnika L. Harris ("Ms. Harris") to Withdraw and Substitution of Counsel (the "Motion").

Ms. Harris is leaving Locke Lord LLP. Accordingly, Ms. Harris seeks to immediately withdraw as counsel for Defendant in the above-referenced matter. Defendant will not be prejudiced by Ms. Harris' withdrawal because Robert T. Mowrey and B. David L. Foster of Locke Lord LLP will remain as counsel for Defendant.

Granting this Motion will not harm or prejudice Plaintiff, nor will the granting of this Motion cause undue delay.

Additionally, please take notice that Vincent J. Hess is entering an appearance in the above-styled and numbered cause on behalf of Defendant:

Vincent J. Hess vhess@lockelord.com Texas Bar No. 09549417 LOCKE LORD LLP 2200 Ross Avenue, Ste. 2800

Dallas, Texas 75201 T: (214) 740-8000

F: (214) 740-8800

Please provide Mr. Hess with copies of all correspondence, pleadings or other documents in this case.

WHEREFORE, Defendant respectfully requests that this Motion be granted, that Ms. Harris be immediately withdrawn as counsel of record for Defendant, that the Court order the docket be amended to reflect that Ms. Harris has withdrawn as counsel for Defendant and no longer needs to be noticed of any pleadings, motions, or other documents filed or served in this case, and that Vincent J. Hess be added as counsel of record for Defendant. Defendant respectfully requests that Robert T. Mowrey and B. David L. Foster continue to be provided with copies of all correspondence, pleadings, or other documents in this case as counsel for Defendant.

Respectfully submitted,

#### LOCKE LORD LLP

#### /s/ Shawnika L. Harris

#### B. David L. Foster

State Bar No. 24031555 dfoster@lockelord.com 600 Congress Ave., Suite 2200 Austin, Texas 78701 (512) 305-4700 (512) 305-4800 (Facsimile)

#### Robert T. Mowrey

State Bar No. 14607500 rmowrey@lockelord.com

#### Vincent J. Hess

Texas Bar No. 09549417 vhess@lockelord.com

#### Shawnika L. Harris

State Bar No. 24106058 Shawnika.Harris@lockelord.com 2200 Ross Avenue, Suite 2800 Dallas, Texas 75201-6776 (214) 740-8000 (214) 740-8800 (Facsimile)

ATTORNEYS FOR DEFENDANT PHH Mortgage Corporation d/b/a PHH Mortgage Services, successor by merger to Ocwen Loan Servicing, LLC

### **CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Defendant attempted to confer with pro se Plaintiff regarding the relief sought herein and received no response.

/s/ Shawnika L. Harris

Shawnika L. Harris

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of February 2022, a true and correct copy of the foregoing document was served on the following via ECF and/or CMRRR according to the Federal Rules of Civil Procedure:

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Attorneys for REALHome Services and Solutions, Inc. Altisource Solutions, Inc. Premium Title Services of Texas, Inc. LLC

/s/ Shawnika L. Harris

Counsel for Defendant PHH Mortgage Corporation d/b/a PHH Mortgage Services, successor by merger to Ocwen Loan Servicing, LLC