# IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

DOROTHY L. MOORE,	
Plaintiff,	
v. )	Case No. 2:21-cv-02575-SHL-tmp U.S. District Court Judge Sheryl H. Lipman
PHH MORTGAGE CORPORATION; HSBC BANK USA, NATIONAL ASSOCIATION, AS TRUSTEE FOR ACE SECURITIES CORP., HOME EQUITY LOAN TRUST, SERIES 2005- HE4; and MACKIE WOLF ZIENTZ & MANN,	
Defendants.	

## JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

COME NOW the Parties, Plaintiff Dorothy L. Moore, and Defendants, PHH Mortgage Corporation, HSBC Bank USA, National Association, as Trustee for Ace Securities Corp., Home Equity Loan Trust, Series 2005-HE4, and Mackie Wolf Zientz & Mann, P.C. (collectively, the "Parties"), by and through counsel, hereby stipulate to the dismissal of Plaintiff's claims, with prejudice, and state as follows:

- 1. The Parties have settled the above captioned matter and are executing the necessary settlement agreements.
- 2. The above captioned matter should be fully and finally dismissed, with prejudice, with each Party to bear its own attorneys' fees and costs as per the proposed Agreed Order of Dismissal. The Parties request that the Court retain jurisdiction for the sole purpose of enforcing the settlement agreement among the Parties.

WHEREFORE, PREMISES CONSIDERED, the Parties jointly pray for the entry of an Agreed Order of Dismissal as pursuant to the provisions hereof, with each Party to bear her or its own cost relative thereto.

THIS, the 6th day of April, 2022.

Respectfully submitted,

### /s/ Joseph V. Ronderos

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## /s/ Rob T. Lieber Jr. (w/ permission JVR)

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### /s/ Curtis D. Johnson, Jr. (w/ permission JVR)

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#### **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this day, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send a notification of such filing to the following:

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THIS, the 6th day of April, 2022.

/s/ Joseph V. Ronderos

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