

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DEBRA MEEKER-SERENO

§

§

v.

§

CIVIL ACTION NO. 4:22-CV-01923

§

**DEUTSCHE BANK NATIONAL
TRUST COMPANY**

§

§

STIPULATION OF DISMISSAL WITHOUT PREJUDICE

TO THE HONORABLE DISTRICT COURT JUDGE:

Pursuant to the Federal Rule of Civil Procedure, Plaintiff Debra Meeker-Sereno hereby stipulates and agrees to the following:

1. Plaintiff filed her Original Petition, Application for Injunctive Relief, and Request for Disclosures in the 127th Judicial Court of Harris County, Texas on May 31st 2022
2. Defendant filed its Notice of Removal on June 13th 2022.
3. Plaintiff no longer desires to pursue her causes of action against Defendant at this time.
4. Plaintiff as well as Defendant shall bear their own attorney's fees, expert fees, and litigation expenses incurred in litigating these claims.
5. Accordingly, Plaintiff requests that the Court dismiss this lawsuit without prejudice against filing same in the future.

WHEREFORE, PREMISES CONSIDERED, the Plaintiff hereto requests that the Court enter the attached Order dismissing the above-entitled and numbered cause without prejudice with costs of court being assessed against the party incurring same.

Respectfully submitted,

VILT LAW, P.C.

By: /s/ Robert C. Vilt
ROBERT C. VILT
Texas Bar Number 00788586
Federal Bar Number 20296
Email: clay@viltlaw.com
5177 Richmond Avenue, Suite 1142
Houston, Texas 77056
Telephone: 713.840.7570
Facsimile: 713.877.1827
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that a conference was held on the merits of this motion on January 4th 2023 with Nicholas Frame and he is not opposed to the relief sought herein.

/s/ Robert C. Vilt
ROBERT C. VILT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was forwarded to all counsel of record pursuant to Rule 21a of the Texas Rules of Civil Procedure on this the 4th day of January, 2023.

Mark D. Cronenwett,
Nicholas Frame,
MACKIE WOLF ZIENTZ & MANN, P. C.
14160 North Dallas Parkway, Suite 900
Dallas, Texas 75254
Telephone: 214.635.2650
Facsimile: 214.635.2686

/s/ Robert C. Vilt
ROBERT C. VILT