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February 2, 2023

Honorable Christine Weems  
Judge Presiding  
281st Judicial District Court  
201 Caroline, 14th Floor  
Houston, Texas 77002

**RE: REQUEST FOR EMERGENCY HEARING RE: PLAINTIFF'S  
APPLICATION FOR TEMPORARY RESTRAINING ORDER**  
*Christopher B. Navarro Plaintiff v. Freedom Mortgage Corporation Defendant*  
*Cause No. 202306813; 281<sup>st</sup> Civil District Court House of Harris County*

Dear Honorable Judge Weems:

Please allow this letter to serve as a request for an emergency hearing setting regarding Plaintiff's Application for Temporary Restraining Order ("TRO") that was filed with and incorporated into the Plaintiff's Original Verified Petition ("Petition") in the above styled and numbered cause.

Plaintiff's undersigned counsel hereby respectfully requests that the Court schedule a hearing on Plaintiff's Application for a TRO before the scheduled foreclosure sale date of his homestead property that is posted and scheduled to occur on Tuesday, February 7, 2023. As set forth in the Petition and Application, if the Defendant proceeds with the foreclosure sale Plaintiff will suffer an immediate and irreparable harm and will have no adequate remedies under the law, and the Defendant will commit the foregoing before notice and a hearing on Plaintiff's Application for Temporary Injunction. Plaintiff will suffer an irreparable harm if the Defendant, and/or any of their agents, employees, attorneys, trustees, substitute trustees, successors and/or assigns are not restrained immediately because Plaintiff will lose legal fee simple title to, ownership, and possession of his homestead residence, which is unique and irreplaceable, and there is no adequate remedy at law to grant Plaintiff complete, final and equitable relief.

Thank you for your assistance in this matter, and please feel free to contact me should you have any questions.

Respectfully submitted,

*/s/ John G. Helstowski*

John G. Helstowski

State Bar No. 24078653

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Attorney for Plaintiff

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#### Case Contacts

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