

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

**ALL ABOUT EQUITY AND
INVESTMENTS, LLC,**

Plaintiff,

v.

**WELLS FARGO BANK, N.A.; AND
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.,**

Defendants.

§
§
§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 4:23-cv-01378

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiff All About Equity and investments, LLC (“Plaintiff”), Defendant Wells Fargo Bank, N.A., and Defendant Mortgage Electronic Registration Systems, Inc. (together, “Defendants”) (collectively, the “Parties”), file this *Joint Motion to Dismiss With Prejudice*, and respectfully show the Court as follows:

1. The Parties have settled all disputes between them. Accordingly, Plaintiff requests the immediate dismissal with prejudice of all of its claims against Defendants.
2. Defendants do not oppose the dismissal with prejudice of all of Plaintiff’s claims against them.
3. This joint motion is made voluntarily and freely, without any coercion or duress in any manner, and prepared jointly by the Parties.

WHEREFORE, the Parties respectfully request dismissal of all of Plaintiff’s claims against Defendants in this lawsuit with prejudice, with each party to bear his/its own costs and expenses. A proposed Order granting this relief is filed herewith.

Respectfully submitted,

/s/ Jeffrey C. Jackson

Jeffrey C. Jackson

jeff@jjacksonllp.com

Texas Bar No. 24065485

S.D. Bar No. 1024221

Charles “Danny” Brooks

danny@jjacksonllp.com

Texas Bar No. 24126064

S. D. Bar No. 3725319

JEFFREY JACKSON & ASSOCIATES, PLLC

2500 E. TC Jester Blvd., Suite 285

Houston, TX 77008

Telephone: (713) 861-8833

ATTORNEY FOR PLAINTIFF

/s/ B. David L. Foster

B. David L. Foster

Attorney-in-Charge

Texas Bar No. 24031555

S.D. Bar No. 35961

dfoster@lockelord.com

LOCKE LORD LLP

300 Colorado Street, Suite 2100

Austin, Texas 78701

Telephone: (512) 305-4700

Facsimile: (512) 305-4800

OF COUNSEL

Robert T. Mowrey

Texas Bar No. 14607500

S.D. Bar No. 9529

rmowrey@lockelord.com

LOCKE LORD LLP

2200 Ross Avenue, Suite 2800

Dallas, TX 75201

Telephone: (214) 740-8000

Facsimile: (214) 740-8800

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served on this 4th day of August 2023 via the Court's electronic service on all counsel of record.

/s/ B. David L. Foster

Attorney for Defendants