

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

NICK BHAGIA, ET AL
Plaintiffs,

v.

PHH MORTGAGE SERVICES, INC.
Defendant.

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CIVIL ACTION NO. 4:22-CV-00452

**PLAINTIFFS’ RESPONSE TO DEFENDANT’S MOTION FOR SUMMARY
JUDGMENT**

Plaintiffs Nick Bhagia (“Bhagia”) and Saihat Corp. (“Saihait”) do not dispute the facts as articulated in the Defendant’s Motion For Summary Judgment filed by Defendant PHH Mortgage Services, Inc., and have no substantive response to the legal arguments and authorities which are cited in the Motion.

Respectfully submitted,

JERRY L. SCHUTZA

By: /s/ Jerry L. Schutza
Jerry L. Schutza
SBN: 17853800
815 Walker, Ste. 1453
Houston, Texas 77002
Telephone: (713) 963-9988
Email: schutzalaw@yahoo.com

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of September 2023, a true and correct copy of the foregoing instrument was forwarded by e-service, email, certified mail, return receipt requested, and/or by hand delivery and/or by fax transmission to counsel of record and any Pro Se parties.

Nick Frame

/s/ Jerry L. Schutza

Jerry L. Schutza