### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

DIANNE DORMAN,

Plaintiff,

v.

DEUTSCHE BANK NATIONAL

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR SECURITIZED ASSET BACKED RECEIVABLES LLC TRUST 2007-NC1, MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2007-NC1 and PHH MORTGAGE CORPORATION,

Defendants.

CIVIL ACTION NO. 4:24-cv-00024-P

#### DEFENDANTS' UNOPPOSED MOTION TO SUBSTITUTE COUNSEL

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Defendants Deutsche Bank National Trust Company, as Trustee for Securitized Asset Backed Receivables LLC Trust 2007-NC1, Mortgage Pass-Through Certificates, Series 2007-NC1 ("Deutsche Bank") and PHH Mortgage Corporation ("PHH", collectively "Defendants") file this Unopposed Motion to Substitute Counsel and respectfully requests the withdrawal of Mark D. Cronenwett of Mackie Wolf Zientz & Mann, P.C., and the substitution of Robert T. Mowrey, Matthew K. Hansen, and Taneska L. Jones of Locke Lord LLP as its counsel of record. In support of this Motion, Deutsche Bank and PHH show the Court the following:

1. Deutsche Bank and PHH are represented by Mark D. Cronenwett of Mackie Wolf Zientz & Mann, P.C. His address is Mackie Wolf Zientz & Mann, P.C., 14160 North Dallas Parkway, Suite 900, Dallas, Texas 75254. Deutsche Bank and PHH have retained new counsel to

represent its interests in this case—Robert T. Mowrey, Matthew K. Hansen, and Taneska L. Jones. Mr. Mowrey, Mr. Hansen, and Ms. Jones are admitted to practice law in the State of Texas and in the United States District Court for the Northern District of Texas, and they have consented to serve as counsel for Deutsche Bank and PHH in this proceeding. Their contact information is below.

- 2. Plaintiff Dianne Dorman is unopposed to the relief requested in this Motion.
- 3. This Motion is not sought for delay, but so that justice may be served.

For these reasons, Deutsche Bank and PHH request that the Court grant this Motion, permit the substitution of Robert T. Mowrey, Matthew K. Hansen, and Taneska L. Jones of Locke Lord LLP as its counsel of record and the withdrawal of Mark D. Cronenwett of Mackie Wolf Zientz & Mann, P.C., and grant Deutsche Bank and PHH such other and further relief to which they may be entitled.

Respectfully submitted,

#### /s/ Mark D. Cronenwett

Mark D. Cronenwett - Attorney-in Charge Texas Bar No. 00787303 mcronenwett@mwzmlaw.com MACKIE WOLF ZIENTZ & MANN, P.C. 14160 North Dallas Parkway, Suite 900 Dallas, Texas 75254 (214) 635-2650 (Telephone) (214) 635-2686 (Facsimile)

# WITHDRAWING COUNSEL FOR DEFENDANTS

-AND-

#### /s/ Taneska L. Jones

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### Taneska L. Jones

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(713) 229-2563 (Facsimile)

## SUBSTITUTING COUNSEL FOR DEFENDANTS

### **CERTIFICATE OF CONFERENCE**

I hereby certify that on the 26<sup>th</sup> day of January 2024, I conferred via phone with counsel for Plaintiff, Ryan Daniel, and Plaintiff is unopposed to the relief requested by this Motion.

#### **CERTIFICATE OF SERVICE**

The undersigned certifies that on January 26, 2024, a true and correct copy of the foregoing document was delivered to the following *via ECF* consistent with the Federal Rules of Civil Procedure:

Ryan Daniel 1525 US Highway 380, Suite 500 #102 Dallas, Texas 75033 T: (469) 688-0621 Email: ryan@ryandaniellaw.com Counsel for Plaintiff Dianne Dorman

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Withdrawing Counsel for Defendants
Deutsche Bank and PHH

/s/ Taneska L. Jones

Counsel for Defendants Deutsche Bank and PHH Mortgage

### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

DIANNE DORMAN, § § § Plaintiff, § v. § § CIVIL ACTION NO. 4:24-cv-00024-P DEUTSCHE BANK NATIONAL § TRUST COMPANY, AS TRUSTEE § FOR SECURITIZED ASSET BACKED **RECEIVABLES LLC TRUST 2007-**§ NC1, MORTGAGE PASS-THROUGH § § **CERTIFICATES, SERIES 2007-NC1** and PHH MORTGAGE § CORPORATION, § § Defendants.

## ORDER GRANTING DEFENDANTS' UNOPPOSED MOTION TO SUBSTITUTE COUNSEL

On this day, the Court considered the Unopposed Motion to Substitute Counsel filed by Deutsche Bank National Trust Company, as Trustee for Securitized Asset Backed Receivables LLC Trust 2007-NC1, Mortgage Pass-Through Certificates, Series 2007-NC1 ("Deutsche Bank") and PHH Mortgage Corporation ("PHH", collectively "Defendants"). Because this Motion is unopposed, and because this Court finds the Motion well founded, the Court hereby **GRANTS** the Motion and **ORDERS** that Robert T. Mowrey, Matthew K. Hansen, and Taneska L. Jones of Locke Lord LLP be substituted into this case as counsel of record for Deutsche Bank and PHH.

The Court further **ORDERS** that Mark D. Cronenwett of Mackie Wolf Zientz & Mann, P.C. is withdrawn from this case as counsel of record for Deutsche Bank and PHH.

**SO ORDERED**, on this \_\_\_\_\_, 2024.

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The Honorable Mark T. Pittman United States District Judge

### **AGREED AS TO FORM AND SUBSTANCE:**

/s/ Mark D. Cronenwett

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## WITHDRAWING COUNSEL FOR DEFENDANTS

-AND-

/s/ Taneska L. Jones

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# SUBSTITUTING COUNSEL FOR DEFENDANTS

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