

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

Joanna Burke )  
Plaintiff ) **CIVIL ACTION No.**  
 ) **4:24-cv-00897**  
 )  
 vs. )  
 )  
 Deutsche Bank National Trust Company, PHH )  
 Mortgage Corporation, AVT Title Services, )  
 LLC, Mackie Wolf Zientz & Mann, PC, Judge )  
 Tami Craft aka Judge Tamika Craft-Demming, )  
 Judge Elaine Palmer, Sashagaye Prince, Mark D )  
 Hopkins, Shelley L Hopkins, Hopkins Law, )  
 PLLC, John Doe, and/or Jane Doe )  
 )  
 Defendants )  
 )  
 )

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**REPLY TO PHH HOPKINS MOTION TO CLARIFY**

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE AND ALL  
INTERESTED PARTIES:

In unison with this reply, Plaintiff has replied to this court in these proceedings in relation to PHH Hopkins response to Plaintiff’s Emergency Motion to Remand. In light of the question of jurisdiction in relation to the snap removal of this case from Harris County District Court, Plaintiff requests the court address that question first before briefing or responses are required by the parties. Furthermore, it should be documented that PHH Hopkins filed the Motion to Clarify during the automatic stay, an additional violation and as such, if the court does determine it has jurisdiction over these proceedings, Plaintiff would request the Motion to Clarify be stricken.

RESPECTFULLY submitted this 7<sup>th</sup> day of April, 2024.



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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on April 7, 2024 as stated below on the following:

**VIA U.S. Mail:**

Nathan Ochsner  
Clerk of Court  
P. O. Box 61010  
Houston, TX 77208

**VIA e-Mail:**

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COUNSEL FOR  
PHH MORTGAGE CORPORATION



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