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

ROSALIE CONNER,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
PHH MORTGAGE CORPORATION,	§	CIVIL ACTION NO. 4:20-CV-02128
DEUTSCHE BANK TRUST COMPANY	§	
AMERICAS, AS TRUSTEE FOR RALI	§	
SERIES 2006-QS6, POWER DEFAULT	LT § §	
SERVICES,		
	§	
Defendants.	§	

SUGGESTION OF BANKRUPTCY AND NOTICE OF AUTOMATIC STAY

Defendants PHH Mortgage Corporation ("PHH"), Deutsche Bank Trust Company Americas, as Trustee for Residential Accredit Loans, Inc., Mortgage Asset-Backed Pass-Through Certificates, Series 2006-QS6¹ ("Deutsche"), and Power Default Services² ("PDS") (collectively "Defendants") file this Suggestion of Bankruptcy and Notice of Automatic Stay, and in support thereof, would respectfully show as follows:

1. Plaintiff Rosalie Conner ("Plaintiff") filed her bankruptcy petition under Chapter 13, Title 11 of the United States Code (the "Bankruptcy Code") on June 1, 2020. The bankruptcy is pending before the United Stated Bankruptcy Court for the Southern District of Texas, Houston

¹ Incorrectly named herein as Deutsche Bank Trust Company Americas, as Trustee for Rali Series 2006-QS6.

² PDS is a nominal defendant that has been improperly joined. In any event, PDS is incorporated in Delaware and has its principal place of business in Georgia, and therefore PDS is a citizen of Delaware and Georgia for diversity purposes.

Division, under Case No. 20-32875. A true and correct copy of the Notice of Bankruptcy Case Filing is attached as **Exhibit A.**

- 2. As a result of Plaintiff's filing of bankruptcy, Section 362 of the Bankruptcy Code operates as a stay, applicable to all entities, of (i) the commencement of a judicial, administrative, or other action or proceeding against Plaintiff that was or could have been commenced before the commencement of the bankruptcy, or to recover a claim against Plaintiff that arose before the commencement of the bankruptcy; (ii) the enforcement, against Plaintiff or against the property of the estates, of a judgment obtained before the commencement of the bankruptcy; (iii) any act to obtain possession of property of the estates or of property from the estates or to exercise control over property of the estates; and (iv) any act to create, perfect, or enforce a lien against the property of the estates.
 - 3. This stay became effective automatically upon the filing of the bankruptcy.

Respectfully submitted,

LOCKE LORD LLP

<u>/s/ Jennifer McCammon</u>

Robert T. Mowrey (Attorney-in-Charge)

State Bar No. 14607500

S.D. No. 9529

rmowrey@lockelord.com

LOCKE LORD LLP

2200 Ross Avenue, Suite 2800

Dallas, Texas 75201-6776

(214) 740-8000

(214) 740-8800 (facsimile)

B. David L. Foster

State Bar No. 24031555

S.D. No. 35961

dfoster@lockelord.com

LOCKE LORD LLP

600 Congress Avenue, Suite 2200

Austin, Texas 78701

(512) 305-4700 (Telephone)

(512) 305-4800 (Facsimile)

Jennifer McCammon

State Bar No. 24101983

S.D. No. 2996936

Jennifer.mccammon@lockelord.com

LOCKE LORD LLP

JPMorgan Chase Tower

600 Travis Street, Suite 2800

Houston, Texas 77002

Telephone: (713) 226-1200

Facsimile: (713) 223-3717

COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served upon the following via certified mail, return receipt requested and regular U.S. Mail pursuant to the Federal Rules of Civil Procedure on June 17th, 2020.

Rosalie Conner 21006 James Long Court Richmond, Texas 77469 *Pro Se Plaintiff*

/s/ Jennifer McCammon
Jennifer McCammon