

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

DEBORAH JAYNE LARSON,

Plaintiff,

v.

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE FOR  
MORGAN PASS-THROUGH  
CERTIFICATES, SERIES 2005-HE1  
AND  
PHH MORTGAGE CORPORATION,

Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. 4:21-cv-00970

**JOINT STIPULATION OF DISMISSAL WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Defendants Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2005-HE1, Mortgage Pass-Through Certificates, Series 2005-HE1 and PHH Mortgage Corporation (collectively, the “*Defendants*”), and Plaintiff Deborah Jayne Larson (“*Plaintiff*”) hereby stipulate and agree to the following:

1. Plaintiff has elected to dismiss all claims in this case against Defendants with prejudice. Defendants have elected to dismiss all counterclaims in this case against Plaintiff with prejudice. Plaintiff and Defendants have agreed that they shall bear their own attorney’s fees, expert fees, litigation expenses, and all costs incurred in connection with this action.

Plaintiff and Defendants jointly request that the Court enter the attached Order dismissing with prejudice all claims in the above-entitled and numbered cause, with the parties to bear their own respective fees and costs.

Respectfully submitted,

By: 

**Brian Paino<sup>1</sup>**

State Bar No. 24065862

[bpaino@mcglinchey.com](mailto:bpaino@mcglinchey.com)

**Nicholas R. O'Conner**

State Bar No. 24110172

[noconner@mcglinchey.com](mailto:noconner@mcglinchey.com)

**MCGLINCHEY STAFFORD**

1001 McKinney, Suite 1500

Houston, Texas 77002

Telephone: (713) 520-1900

Facsimile: (713) 520-1025

*ATTORNEYS FOR DEFENDANTS*

**CRAIN, CATON & JAMES, PC**

  
\_\_\_\_\_  
**Keith Allen Taylor**

[ktaylor@craincaton.com](mailto:ktaylor@craincaton.com)

1401 McKinney, Suite 1700

Houston, Texas 77010-4035

(713) 658-2323 (Telephone)

(713) 658-1921 (Facsimile)

*ATTORNEYS FOR PLAINTIFF*

\_\_\_\_\_  
<sup>1</sup> Irvine, CA Office.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 6, 2021, a copy of the above and foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing has been forwarded to all parties, by and through their attorneys of record by operation of the Court's electronic filing system.

**Via Email**

Darlene Payne Smith

[dsmith@craincaton.com](mailto:dsmith@craincaton.com)

Keith Allen Taylor

[ktaylor@craincaton.com](mailto:ktaylor@craincaton.com)

CRAIN, CATON & JAMES, PC

1401 McKinney, Suite 1700

Houston, Texas 77010-4035

(713) 658-2323 (Telephone)

(713) 658-1921 (Facsimile)

***Attorneys for Plaintiff***

/s/ Nicholas R. O'Conner

Nicholas R. O'Conner