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

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§	Civil Action No. 4:24-cv-00415
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## JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiffs Avery Shepherd and Ninora Shepherd ("Plaintiffs") and Defendants Deutsche Bank National Trust Company, as Trustee for Argent Securities Inc., Asset-Backed Pass-Through Certificates, Series 2005-W2 ("Deutsche Bank") and PHH Mortgage Corporation ("PHH," collectively "Defendants") file this Joint Stipulation of Dismissal with Prejudice ("Stipulation"). Plaintiffs and Defendants, by and through their undersigned counsel, hereby stipulate and agree that, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), all claims and causes of action asserted, or could have been asserted, by Plaintiffs against Defendants are hereby dismissed with prejudice. This Stipulation is meant to address all claims Plaintiffs have brought against Defendants in this lawsuit.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants jointly request that the Court enter the attached Order of Dismissal with Prejudice dismissing all claims and causes of

ORDER 137228449v.1 action asserted, or could have been asserted, by Plaintiffs against Defendants with prejudice. Plaintiffs and Defendants additionally request that all taxable costs, expenses, and attorneys' fees be borne by the party incurring same.

Date: May 31, 2024.

Respectfully submitted,

#### /s/ Taneska L. Jones

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# COUNSEL FOR PLAINTIFFS AVERY SHEPHERD AND NINORA SHEPHERD

#### **CERTIFICATE OF SERVICE**

The undersigned certifies that on May 31, 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:

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