

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

Robert T. Mowrey - Attorney-in-Charge

Texas Bar No. 14607500

S.D. Texas Bar No. 9529

rmowrey@lockelord.com

Locke Lord LLP

2200 Ross Avenue, Suite 2800

Dallas, Texas 75201-2750

Telephone: (214) 740-8496

B. David L. Foster

Texas Bar No. 24031555

dfoster@lockelord.com

LOCKE LORD LLP

300 Colorado Street, Suite 2100

Austin, Texas 78701

Telephone: (512) 305-4700

Facsimile: (512) 305-4800

Taneska L. Jones

Texas Bar No. 24106151

S.D. Texas Bar No. 3171280

tanaska.jones@lockelord.com

LOCKE LORD LLP

600 Travis Street, Suite 2800

Houston, Texas 77002

Telephone: (713) 226-1563

Facsimile: (713) 229-2563

**COUNSEL FOR DEFENDANTS
DEUTSCHE BANK AND PHH**

-AND-

/s/ Jeffrey C. Jackson

Jeffrey C. Jackson

Texas Bar No. 24065485

jeff@jjacksonpllc.com

Jeffrey Jackson & Associates, PLLC

2500 E. TC Jester Boulevard, Suite 285

Houston, Texas 77008

Telephone: (713) 861-8833

Facsimile: (713) 682-8866

**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:

Jeffrey C. Jackson

Jeffrey Jackson & Associates, PLLC

2500 E. TC Jester Boulevard, Suite 285

Houston, Texas 77008

Telephone: (713) 861-8833

Facsimile: (713) 682-8866

jeff@jjacksonpllc.com

Counsel for Plaintiffs

/s/ Taneska L. Jones

Counsel for Defendants Deutsche Bank and PHH