CAUSE NO. 202237679

DEUTSCHE BANK NATIONAL TRUST § IN THE DISTRICT COURT OF **COMPANY, AS TRUSTEE FOR MORGAN** § STANLEY ABS CAPITAL I INC. TRUST § 2004-HE6, MORTGAGE PASS-THROUGH § **CERTIFICATES, SERIES 2004-HE6** § § **Plaintiff** § vs. § § § **CARLOS O. RAMOS AND CONSUELO** HARRIS COUNT **RAMOS AND THE HEIRS AT LAW OF** § **CONSUELO RAMOS, DECEASED Defendants** 61st JUDICIAL DISTRICT

RE: 7030 HAZEN STREET HOUSTON, TX 77074

PLAINTIFF'S MOTION TO REINSTATE CASE AFTER NON-SUIT

COMES NOW Plaintiff, Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2004-HE6, Mortgage Pass-Through Certificates, Series 2004-HE6, and files this Motion to Reinstate Case, and in support respectfully shows the Court as follows:

- 1. Plaintiff filed its original petition on June 23, 2022, its first amended petition on March 30, 2023, and its second amended petition on May 5, 2023.
- 2. Plaintiff's suit seeks an order authorizing foreclosure against the heirs at law of a deceased mortgagor, Consuelo Ramos
- 3. An ad litem was appointed to represent the unknown heirs and locate possible heirs that need to be served with Plaintiff's petition.

- 4. Pursuant to the appointment, the ad litem filed a report identifying all additional heirs to be served.
- 5. All known heirs have been served and the unknown heirs have been served with publication.
- 6. Other than the attorney ad litem, no other party has filed an answer.
- 7. This case was set for trial on January 29, 2024, pursuant to a docket control order.
- 8. Due to an unintentional error, a non-suit was filed, non-suiting the case.
- 9. The order granting non-suit was signed on January 29, 2024.
- 10. Plaintiff humbly asks this court to reinstate the case on the Court's docket to allow Plaintiff to proceed with its Motion for Summary Judgment

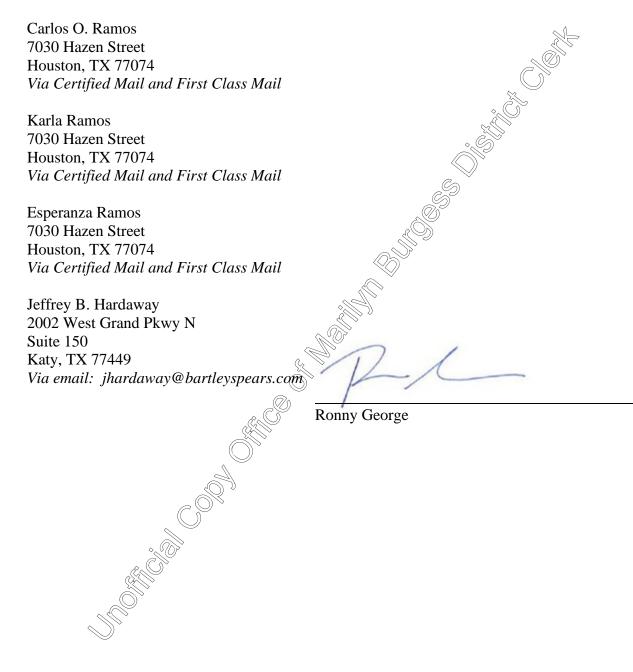
WHEREFORE, PREMISES CONSIDERED Plaintiff respectfully prays that this Court grant Plaintiff's Motion to Reinstate. Plaintiff further prays for such other relief, in equity or at law, to which it may show itself justly entitled.

Respectfully submitted,

Ronny George State Bar No. 24123104 LOGS Legal Group LLP 13105 Northwest Freeway, Suite 960 Houston, TX 77040 Telephone: (713) 462-2565 Facsimile: (847) 879-4854 Email: rgeorge@logs.com *Attorney for* Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2004-HE6, Mortgage Pass-Through Certificates, Series 2004-HE6

CERTIFICATE OF SERVICE

I certify that on this 29th day of February 2024, a true and correct copy of the foregoing has been sent to:



VERIFICATION

STATE OF TEXAS § SCOUNTY OF HARRIS §

I have read the Motion and I have personal knowledge of all the facts set forth therein based on my review of the available documents and information provided by my client, and, to the best of my knowledge, all of said facts statements, and opinions are true and correct.

My name is Ronny George, and my address is 13105 Northwest Freeway, Suite 960, Houston, Texas 77040. Pursuant to Texas Civil Practice and Remedies Code § 132, I declare under penalty of perjury that the foregoing is true and correct.

Executed in Harris County, State of Texas, on the 29th day of February 2024.

Ronny George

Automated Certificate of eService

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Emily Humphreys on behalf of Ronny George Bar No. 24123104 ehumphreys@LOGS.com Envelope ID: 85048350 Filing Code Description: Motion (No Fee) Filing Description: Motion (No Fee) Status as of 2/29/2024 12:39 PM CST

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