

**CAUSE NO. 202237679**

**DEUTSCHE BANK NATIONAL TRUST  
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  
RAMOS AND THE HEIRS AT LAW OF  
CONSUELO RAMOS, DECEASED**

*Defendants*

**RE: 7030 HAZEN STREET  
HOUSTON, TX 77074**

**IN THE DISTRICT COURT OF**

**HARRIS COUNTY, TEXAS**

**61st JUDICIAL DISTRICT**

**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 29<sup>th</sup> day of February 2024, a true and correct copy of the foregoing has been sent to:

Carlos O. Ramos  
7030 Hazen Street  
Houston, TX 77074  
*Via Certified Mail and First Class Mail*

Karla Ramos  
7030 Hazen Street  
Houston, TX 77074  
*Via Certified Mail and First Class Mail*

Esperanza Ramos  
7030 Hazen Street  
Houston, TX 77074  
*Via Certified Mail and First Class Mail*

Jeffrey B. Hardaway  
2002 West Grand Pkwy N  
Suite 150  
Katy, TX 77449  
*Via email: [jhardaway@bartleypears.com](mailto:jhardaway@bartleypears.com)*



---

Ronny George

Unofficial Copy Office of Marilyn Burgess District Clerk


**VERIFICATION**

STATE OF TEXAS                   §  
   §  
COUNTY 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 29<sup>th</sup> day of February 2024.

  
\_\_\_\_\_  
Ronny George

Unofficial Copy Office of Marilyn Burgess District Clerk

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

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

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jeffrey Ben Hardaway	24038254	jhardaway@bartleypears.com	2/29/2024 11:57:01 AM	SENT
Katie Costa		kcosta@logs.com	2/29/2024 11:57:01 AM	SENT
Ronny George		rgeorge@logs.com	2/29/2024 11:57:01 AM	SENT
Emily Humphreys		ehumphreys@LOGS.com	2/29/2024 11:57:01 AM	SENT

Unofficial Copy Office of Marilyn Burgess District Clerk