

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

Jeff Samuels. PLAINTIFF

§

V.

§ Case Number: 4:23-cv-04687

PHH MORTGAGE CORPORATION,  
AVT TITLE SERVICES LLC,  
DEUTSCHE BANK NATIONAL  
TRUST CO.,  
POWER DEFAULT SERVICES INC.,

§  
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§  
§  
§

United States Courts  
Southern District of Texas  
**FILED**

NOV 15 2024

Nathan Ochsner, Clerk

**PLAINTIFF'S RESPONSE FOR A MOTION TO REMAND TO DEFENDANT'S  
AVT TITLE SERVICES, LLC'S MOTION TO DISMISS PLAINTIFF JEFF SAMUELS'  
CLAIMS**

Plaintiff filed this Response to DEFENDANT'S AVT TITLE SERVICES, LLC'S MOTION TO DISMISS PLAINTIFF JEFF SAMUELS' CLAIMS! AVT Title Services, LLC is a legitimate party to this legal proceeds due to the fraudulent acts committed by the Defendant.

**I. INTRODUCTION AND BACKGROUND**

1. At the time of the closing, at the Title Co, Plaintiff was not present to signed any closing documents, therefore, the Title Co had Plaintiff's spouse at that time to sign on Plaintiff's behalf. There was no 'Power of Attorney' signed by the Plaintiff in order for the transaction to commence nor did the title company inform me that my spouse at the time would sign on my behalf.
2. Therefore, according to Federal law relating to 'Mortgage Fraud' and 'Loan Fraud' pursuant to **18 U.S.C. § 1014 and 18 U.S.C. § 1341.**
3. The Defendent all so violated Texas Section 27.01(a), (b), (C) - Fraud in Real Estate.

**Before the Honorable**

Alfred H Bennett

**PLACE:**

Courtroom: **9A**

United States District Court

515 Rusk Ave

Houston, TX

**DATE: August 9, 2024**

**TIME: 9:30 a.m.**

**TYPE OF PROCEEDING:** Initial Conference

**CERTIFICATE OF SERVICE**

Jeff Samuels, Pro Se Plaintiff

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I certify that a true and correct copy of the foregoing has been forwarded in accordance with the Texas Rules of Civil Procedure on May 21, 2024, as follows:

Via e-mail

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