

CAUSE NO. 2025-00366

BEAU ESCHETE,

Plaintiff,

v.

PHH MORTGAGE CORPORATION,

Defendant.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

189TH JUDICIAL DISTRICT

**DEFENDANT'S NOTICE OF REMOVAL TO THE UNITED STATES DISTRICT
COURT, SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION**

PLEASE TAKE NOTICE THAT pursuant to 28 U.S.C. §§ 1332, Defendant PHH Mortgage Corporation ("**PHH**") filed removal papers with the Clerk of the United States District Court for the Southern District of Texas, Houston Division, regarding the above-styled action. A copy of the Notice of Removal (without its accompanying exhibits) is attached hereto as Exhibit 1 and incorporated by reference.

PHH respectfully requests that the 189th Judicial District Court in Harris County, Texas proceed no further in this action unless and until such time as the action may be remanded by order of the United States District Court for the Southern District of Texas.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ
A Professional Corporation**

By: /s/ Emily Stroope

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***Attorneys for Defendant PHH Mortgage
Corporation***

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been forwarded in accordance with the Texas Rules of Civil Procedure on February 20, 2025, as follows:

Via eFile Texas

Erick DeLaRue

2800 Post Oak Boulevard, Suite 4100

Houston, TX 77056

Email: erick.delarue@delaruelaw.com

Attorney for Plaintiff

/s/ Emily Stroope

EMILY STROOPE

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.

Julia O'Boyle on behalf of Emily Stroope

Bar No. 24070692

joboyle@bakerdonelson.com

Envelope ID: 97615051

Filing Code Description: Notice

Filing Description: Defendants Notice of Removal to the United States

District Court Southern District of Texas Houston Division

Status as of 2/21/2025 8:12 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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