

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

**U.S. BANK N.A., AS TRUSTEE FOR
THE REGISTERED HOLDERS OF
MASTR ASSET BACKED SECURITIES
TRUST, 2006-AM1, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES
2006-AM1**

Plaintiff,

v.

**VENISSA FORD A/K/A VENISSA
MOSLEY, JASON MOSLEY, QUINTEN
TYLER, CHERYL AHAMBA, BERNAL
LINDSEY, BERMOINE LINDSEY, JR.,
DESTINY ROSS, JERMOINE LINDSEY,
ELAINE JACKSON A/K/A ELAINE
JACKSON LINDSEY, AS NEXT-
FRIEND OF A.L., A MINOR, ADRAIN
LINDSEY, MARCUS LINDSEY, AND
DIANA LINDSEY**

Defendants.

Civil Action No. 4:22-cv-3499

AGREED MOTION TO CONTINUE REINSTATEMENT DEADLINE

COME NOW, Plaintiff U.S. Bank N.A., As Trustee for the Registered Holders of MASTR Asset Backed Securities Trust, 2006-AM1, Mortgage Pass-Through Certificates, Series 2006-AM1 (“U.S. Bank” or “Plaintiff”) and Defendant Diana Lindsey, as Independent Executor of the Estate of Leal Lindsey (“Defendant”) (collectively, the Parties”) and file this their Agreed Motion to Continue Reinstatement Deadline and respectfully show the Court as follows:

1. On March 18, 2025, the Parties filed their Joint Notice of Settlement announcing an agreement had been reached to resolve this matter contingent upon the sale of the subject property. [ECF Doc. No. 76].

2. On March 24, 2025, the Court entered an Order of Dismissal, requiring any Motion for Reinstatement to be filed within 60 days of the Order.

3. The Parties are still coordinating with the seller's agent and title company to provide all required documents to facilitate the sale of the property and pay off of the lien. The Parties believe a resolution can be reached without the need for further litigation but more time is required to close the sale.

4. Accordingly, the Parties are requesting to continue the reinstatement deadline 30 days to allow for the sale of the subject property.

5. The continuance is not sought for purposes of delay, but so that justice may be done.

PRAYER

For these reasons, Plaintiff moves the Court to continue the reinstatement deadline thirty (30) days to allow for additional time to finalize the sale of the Property. The Parties further requests all other relief to which it may be entitled.

Respectfully submitted,

By: /s/ John M. Gregory
JOHN M. GREGORY
Attorney in Charge
Texas Bar No. 24138787
Southern District Bar No. 3869561
jgregory@mwzmlaw.com

MACKIE WOLF ZIENTZ & MANN, P.C.
14160 N. Dallas Parkway, Suite 900
Dallas, Texas 75254
Phone: (214) 635-2650
Facsimile: (214) 635-2686
Attorneys for Plaintiff

And

By: /s/ Mark A. Carrigan with permission
MARK A. CARRIGAN
Texas Bar No. 03875200
eservice@carriganlawgroup.com

CARRIGAN LAW GROUP, P.C.
3100 Timmons Lane, Suite 210
Houston, Texas 77027
Telephone: 713-337-3950
Facsimile: 888-858-2140

ATTORNEY FOR DEFENDANT

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that the Parties have conferred via email regarding the contents of this motion. The Parties agree to the relief requested.

/s/ John M. Gregory _____

JOHN M. GREGORY

CERTIFICATE OF SERVICE

The undersigned certifies that on May 21, 2025, a true and correct copy of the foregoing document was delivered to the following counsel of record in the manner described below:

Mark A. Carrigan
3100 Timmons Lane, Suite 210
Houston, Texas 77027
Phone: 713-337-3950 / Fax: 888-858-2140
Email: eservice@carriganlawgroup.com
*Attorney for Defendant Diana Lindsey, as
Independent Executor of the Estate of Leal Lindsey*

/s/ John M. Gregory _____

JOHN M. GREGORY