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

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§	Civil Action No. 4:22-cv-03146
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PLAINTIFF'S MOTION TO CONTINUE INITIAL CONFERENCE

Deutsche Bank National Trust Company, as Trustee for Fremont Home Loan Trust 2002-2, Asset-Backed Certificates, Series 2002-2 ("Deutsche Bank" or "Plaintiff") files this *Motion to Continue Initial Conference* ("Motion") and shows the Court as follows:

- 1. Plaintiff filed its *Original Complaint* ("Complaint") on September 14, 2022, against Defendant Dianna Freeman [ECF Doc. No. 1].
 - 2. On September 15, 2022, a Summons was issued on Defendant [ECF Doc No. 4].
 - 3. Plaintiff is still completing service on Defendant Dianna Freeman.
- 4. The Initial Conference for this matter is set for October 19, 2022, at 10:20 AM. [ECF No. 5].
- 5. For these reasons, Plaintiff respectfully requests a continuance of the initial conference by 60 days in order to successfully complete service on Defendant Dianna Freeman, to file the corresponding returns of service, and to allow the required time for Defendant to file an answer.

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6. 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 initial conference for 60 days. Plaintiff further requests all other relief to which it may be entitled.

Respectfully submitted,

By: /s/ Nicholas M. Frame

MARK D. CRONENWETT

Texas Bar No. 00787303 Southern District Admission#21340 Attorney in Charge mcronenwett@mwzmlaw.com

NICHOLAS M. FRAME

State Bar No. 24093448 Southern District Admission #3121681 Of Counsel nframe@mwzmlaw.com

MACKIE WOLF ZIENTZ & MANN, P.C.

14160 North Dallas Parkway, Suite 900

Dallas, TX 75254

Telephone: 214-635-2650 Facsimile: 214-635-2686

ATTORNEYS FOR PLAINTIFF