

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

Joanna Burke	)	<b>CIVIL ACTION No.</b>
	)	<b>4:24-cv-00897</b>
Plaintiff	)	
	)	
vs.	)	
	)	
Deutsche Bank National Trust Company, PHH	)	
Mortgage Corporation, AVT Title Services,	)	
LLC, Mackie Wolf Zientz & Mann, PC, Judge	)	
Tami Craft aka Judge Tamika Craft-Demming,	)	
Judge Elaine Palmer, Sashagaye Prince, Mark D	)	
Hopkins, Shelley L Hopkins, Hopkins Law,	)	
PLLC, John Doe, and/or Jane Doe	)	
	)	
	)	
Defendants	)	
	)	

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

**JUN 13 2024**

**Nathan Ochsner, Clerk of Court**

**PLAINTIFF’S REPLY TO OBJECTIONS TO MOTION TO STRIKE PHH MORTGAGE CORPORATION’S MOTION TO DECLARE PLAINTIFF JOANNA BURKE AS A VEXATIOUS LITIGANT & MOTION FOR EXTENSION OF TIME**

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE AND ALL INTERESTED PARTIES:

**PHH Hopkins Failed to Provide 21-Days Safe Harbor Notice Before Filing the Motion**

In response to Plaintiff’s Motion to Strike, PHH Mortgage Corporation (“PHH”) through counsel Mark and Shelley Hopkins contends that Plaintiff’s Motion to Strike lacks merit and criticizes the Plaintiff’s legal acumen. However, PHH’s response fails to engage with the substantive legal arguments presented by the Plaintiff and instead resorts to ad hominem attacks.

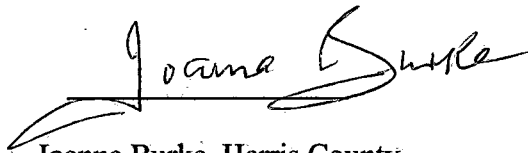
Notably, PHH’s rebuttal in section 4, titled “Motion to Strike,” lacks any reference to relevant legal authorities or attempts to address the caselaw cited by the Plaintiff.

Additionally, the precedent set forth in *Alanis v. Wells Fargo Bank*, No. SA-21-CV-01261-

JKP (W.D. Tex. Feb. 17, 2022), which received commendation for its comprehensive legal analysis, underscores the Plaintiff's ability to interpret and apply the law accurately, as affirmed by the Fifth Circuit Court in *Alanis v. Wells Fargo Bank*, No. 22-50246 (5th Cir. Dec. 22, 2022).

Given PHH's glaring failure to comply with the mandatory 21-day safe harbor provision, as stipulated by *HUDNALL v. STATE OF TEXAS* (3:22-cv-00036-KC-RFC) District Court, W.D. Texas, the Plaintiff's reliance on this precedent is well-founded. Consequently, the Motion to Strike should be granted, and any objections raised by PHH regarding the Plaintiff's Motion for an Extension of Time are rendered moot.

RESPECTFULLY submitted this 11<sup>th</sup> day of June, 2024.



Joanna Burke, Harris County  
State of Texas / Pro Se

46 Kingwood Greens Dr  
Kingwood, Texas 77339  
Phone Number: (281) 812-9591  
Fax: (866) 705-0576  
Email: joanna@2dobermans.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on June 11, 2024 as stated below on the following:

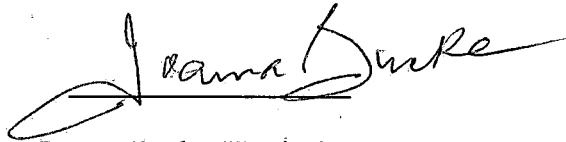
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**VIA e-Mail:**

Shelley L. Hopkins  
Mark D. Hopkins  
HOPKINS LAW, PLLC  
2802 Flintrock Trace, Suite B103  
Austin, Texas 78738  
mark@hopkinslawtexas.com  
shelley@hopkinslawtexas.com

PHH MORTGAGE CORPORATION

A handwritten signature in black ink that reads "Joanna Burke". The signature is written in a cursive style with a large, looping initial 'J'.

Joanna Burke, Harris County  
State of Texas / Pro Se

46 Kingwood Greens Dr  
Kingwood, Texas 77339  
Phone Number: (281) 812-9591  
Fax: (866) 705-0576  
Email: joanna@2dobermans.com



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