

IN THE COURT OF APPEALS

STATE OF GEORGIA

DEUTSCHE BANK TRUST CO.	§	
AMERICAS, AS TRUSTEE	§	Case: A26A0631
MR. COOPER/NATIONSTAR	§	
	§	
Plaintiffs/Appellees	§	Related Previous:
	§	Previous: S24A1170
v.	§	Court of Appeals A25A0197
	§	
CHRISTOPHER M. HUNT, Sr.	§	
	§	DeKalb Case:
Defendant/Appellant	§	19cv10619 & 18CV4742-2
	§	

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REPLY TO OBJECTION FOR SUBPEONA FOR DEPOSITION MANDATED

JOINDER PARTY ROCKET MORTGAGE VARUN KRISHNA & ALLOW

HOMEOWNER BACK IN HIS HOME

APPELLEES ADMIT BY OMISSION APPELLANT NEVER MISSED A

PAYEMENT, TRANSCRIPT HEARING CRIMINALLY ALTRERED,

COLLATERAL ATTACK FOR FRAUD ON COURTS, O.C.G.A § 9-11-59 &

60(a) (d)(1) (2) (3)(f)(g)(h) FRAUS OMNIA CORRUMPIT.

Appellant:

Rev. Christopher M. Hunt, Sr. Ph.D. Pro Se

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COMES NOW Appellant “Homeowner” pro se due to damages from temporary theft of home and \$500,000+ equity unavailable to hire counsel and files this REPLY TO OBJECTION FOR SUBPEONA FOR DEPOSITION MANDATED JOINDER PARTY ROCKET MORTGAGE KRISHNA per Wisdom AKA Lady Justice of Spirit and intent of U.S. Constitutional law and wisest judge of famous “Dividing Baby/Solomon Sword case” Proverbs 17 and avers:

“A wise servant will rule over a son who causes shame, and will share an inheritance among the brothers. The refining pot is for silver and the furnace for gold, But the Lord tests the hearts. An evildoer gives heed to false lips; A liar listens eagerly to a spiteful tongue. Whoever rewards evil for good, Evil will not depart from his house. He who justifies the wicked, and he who condemns the just, both of them alike are an abomination to the Lord. A wicked man accepts a bribe behind the back to pervert the ways of justice. Also, to punish the righteous is not good, nor to strike princes for their uprightness.” and avers:

## INTRODUCTION

We all know the proven white-collar criminal Mortgagees and their bad acting bill collector attorneys who should not be allowed to practice law in honorable Court have lied and defrauded so much they cannot remember what they have lied and defrauded about, and they have proven are incompetent at law because if not saved by judge’s their filings with cites were proven to support 100% legally right Homeowner! Interesting note is the proposed new replacement attorney for the fifth fired/quit attorneys instant lawsuit trying to steal Homeowner’s home is not signed onto the filing objecting to mandated joinder party Krishna CEO of Rocket Mortgage. Now proven ~~Broken-Graham-Cracker~~ Brooke Gram cannot practice

unethical cheat law without fired Patrick Silloway helping her because Balch shows not worthy to practice law in Court due now knowingly defrauding the court by bad faith objection! Here is excerpt of Homeowner overcoming exact same objection about Chris Carr and CFPB being joined due to violations of probation and federal court orders Chris Carr had \$MMS for Georgia homeowners but Homeowner not only has not received any money but more illegal abuse! Previous Filing Excerpt:

#### APPELLEES RESPONSE AFFIRMS ADDING CHRIS CARR

The Appellees did not cite any law or court rules contradicting Homeowner's cited law and cases for accepting Mandated Joinder Party Attorney General Chris Carr for Supreme Court filing of 18cv4742 fraud on court, contempt, no jurisdiction, etc. illegal acts by now admitted joint parties Defendants! Joinder just as mandated joinder Chris Carr. Any reasonable person would think that if Defendants were honest and legally correct by law, they would rejoice to have the Attorney General join case and help Court bring resolution for justice and truth prevail!

Homeowner sees no way to interpret the Response other than "We are in serious trouble because if Chris Carr gets involved in this case not only will we lose but our clients have done everything and even more illegal and unethical acts instead of correcting themselves so violated probation and two settlement agreements after Settling for \$200,000,000+! And we as sworn officers to the court have misbehaved so badly, we will be lucky only to be sanctioned instead of disbarred. Our only chance is to defraud Appeals Court to prevent Mandated Joinder Party and hope Appeals Court will be biased in legal oligarchy nepotism against pro se to save us as we compromised and corrupted the trial court justice to extremes of denying State of Georgia Constitutional right for a jury trial and altering the transcripts of a hearing to remove evidence of our guilt and to sabotage appeal!" Cited O.C.G.A. § 9-11-19 with case law and nature of Supreme Court of Georgia case as originally filed show Chris Carr is Mandated Joinder Party for Appellant. Court should welcome the addition to have expert help for truth and justice. Homeowner is adding Chris Carr (now Krishna CEO Rocket Mortgage because bought Mr. Cooper Mortgagees):

O.C.G.A. § 9-11-21 Parties may be dropped or added by order of court, on motion of any party or of the court's own initiative, at any stage of the action and on such terms as are just. **This includes appeal.** Guhl v. Tuggle, 242 Ga. 412, 249 S.E.2d

219 (1978); Zappa v. Automotive Precision Mach., Inc., 205 Ga. App. 584, 423 S.E.2d 286 (1992); Altama Delta Corp. v. Howell, 225 Ga. App. 78, 483 S.E.2d 127 (1997).

In order for an additional party to be added to an existing suit by amendment pursuant to O.C.G.A. § 9-11-15, leave of court must first be sought and obtained pursuant to O.C.G.A. § 9-11-21. Among the factors to be considered by the trial court in determining whether to allow the amendment are whether the new party will be prejudiced thereby and whether the movant has some excuse or justification for having failed to name and serve the new party previously. Aircraft Radio Systems, Inc. v. Von Schlegell, 168 Ga. App. 109, 308 S.E.2d 211 (1983).

1.

VARUN KRISHNA CEO OF ROCKET MANDATED JOINDER PARTY DUE  
BUYING MR. COOPER MORTGAGE SO ASSUMES ALL LIABILITIES

As previously filed and Mortgagees did not dispute, since Rocket Mortgage and CEO Venu Krishna disregarded Homeowner's several registered mail warnings of instant case and liabilities, they have assumed all liability with purchase of Mr. Cooper. Georgia law is very clear for Successor Liability in Georgia Code § 14-2-1106 and § 14-11-905, the surviving entity in a merger automatically takes on all liabilities, debts, and pending lawsuits of the previous business. This is true to extent of asset purchase; a buyer may be liable if the court finds the transaction was structured to escape liability (a "mere continuation" of the old company)!

IN CONCLUSION Varun Krishna CEO of Rocket Mortgage is recognized a Mandated Joinder party and must be deposed to see if Jay Bray et al of Mr. Cooper were honest or lied about instant case to Varun Krishna since Brooke Gram admitted

to “Strategizing with clients how to respond to filings” and then forced to admit defrauded courts during the final 19CV10619 hearing - but then altered transcripts!

PLEASE DO NOT OBJECT COURT ORDER HOMEOWNER BACK IN HOME  
– PLEASE IN PREPONDERANCE OF CAUTION PER PROBATION AND  
COURT ORDERS AGREE TO ALLOW HOMEOWNER BACK IN HIS HOME

THEREFORE Homeowner prayerfully requests honorable Court Order:

1. Varun Krishna CEO of Rocket Mortgage is recognized a Mandated Joinder party and there be deposition while everything instant case is on hold for S24A1170 be given new COA case number, briefs filed, ruling.
2. Reverse illegal eviction and allow Homeowner back in his home until ruling in new case for S24A1170.
3. Order Carr, CFPB, agreed electronic expert access to original unaltered transcript recordings and video Zoom of hearing 19CV10619.
4. Grant hearing for Mandated Joinder Parties A.G. Chris Carr and CFPB to testify and be questioned (via remote video if necessary).
5. Vacate all previous nullity orders, wrongful contemptuous foreclosure and eviction and with new trial court judge grant the requested jury trial.

Any and all other relief and benefit allowed by law and per Court’s discretion.

This 2<sup>nd</sup> Day of April 2026,

//Christopher M. Hunt, Sr.// (electronic signature)

Rev. Christopher M. Hunt, Sr. Ph.D.

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CERTIFICATE OF COMPLIANCE  
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STATE OF GEORGIA

DEUTSCHE BANK TRUST CO.	§	
AMERICAS, AS TRUSTEE	§	Case: A26A0631
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	§	
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	§	
CHRISTOPHER M. HUNT, Sr.	§	
	§	DeKalb Case:
Defendant/Appellant	§	19cv10619 & 18CV4742-2
	§	

CERTIFICATE OF SERVICE

I have sent a copy of this petitioner's REPLY TO OBJECTION FOR SUBPEONA FOR DEPOSITION MANDATED JOINDER PARTY ROCKET MORTGAGE VARUN KRISHNA AND ALLOW HOMEOWNER BACK IN HIS HOME via email court system and I certify that there is a prior agreement with Balch, Ivey, Gram, Silloway to allow documents in a .PDF format sent via email to suffice for service Rule 6 this 3rd April 2025

Dallas Ivey who cased all this by defrauding DeKalb Magistrate Court!  
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