IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

CHRISTOPHER M. HUNT, Sr	§
KEN PAXTON Attorney General	§
CONSUMER FIN. PROTECTION B.	§
Plaintiff	§ CASE No. 3:24-cv-01555
-versus-	§
	§
MR. COOPER GROUP INC.	§
(NATIONSTAR) OFFICERS	§ Removed 44th District Court,
CORPORATE& INDIVIDUALLY:	§ Dallas Co., No. DC-24-05455
JAY BRAY Chairman CEO,	§
CHRIS MARSHALL Vice Chairman	§ JURY TRIAL
MIKE WEINBACH Pres.	§
KELLY DOHERTY, EVP Chief Admn	§
ETHAN ELZEN EVP Bus. & Finance,	§
KURT JOHNSON EVP CFO,	§
JAY JONES EVP Servicing	§
SNEZHINA PANOVA-BAKRI Sr V. P.	§
CARLOS M. PELAYO EVP Chief Et. Al.	§
ROCKET MORTGAGE	§
VARUN KRISHNA CEO Rocket Mort.	§
Defendants	_§

VERIFIED EMERGENCY MOTION TO REOPEN OR IN ALTERNATIVE NOTICE OF INTENT TO APPEAL

Christopher M. Hunt, Sr. forced Pro Se Homeowner 5456 Peachtree Blvd, #410 Chamblee GA 30341-2235 1cor13cmh@gmail.com 770-457-3300

FRAP 26.1 Certificate Interested Parties (C-I-P) 3:24-cv-01555 DC-24-05455

Pursuant to Federal Court Rules, Christopher M. Hunt, Sr. ("Homeowner") hereby certify that the following is a complete list of all trial judges, attorneys, persons, associations of persons, firms, partnerships, or corporations that have an interest in the outcome of the present appeal, including subsidiaries, conglomerates, affiliates, parent corporations, and publicly held corporations that own 10% or more of the party's stock: (Homeowner being pro se defers to opposing counsel to perfect).

- Bray, Jay CEO (and all C Level Defendants) defaulted and acknowledged his braying about company so bad it must transform beyond just name change. He is incorrigible in lies, gross, willful contempt of court orders & Probation.
- Deutsche Bank National Trust Companies: "DBNTC" is associated with Homeowner's mortgage and possibly many other like situated. "DBNTC" is a national banking association organized under the law of the United States to carry on the business of a limited purpose trust company. Deutsche Bank is a wholly owned subsidiary of Deutsche Bank Holdings, Inc., which is a wholly owned subsidiary of Deutsche Bank Trust Corporation, which is a wholly owned subsidiary of Deutsche Bank AG, a banking corporation organized under the laws of the Federal Republic of Germany. No publicly-held company owns 10% or more of the Deutsche Bank AG's stock. Deutsche Bank' s main office is in Los Angeles, California. Deutsche Bank's principal office of trust administration is in Santa Ana, California. As a national banking association, Deutsche Bank is operating illegally without being registered in headquarters state with registered agent in violation to U.S. Supreme Court American Bank & Trust Co. v. Federal Reserve Bank, 256 U.S. 350 (1921) A federal reserve bank is not a national banking association within § 24, cl. 16, of the Judicial Code, which declares that such associations, for the purposes of suing and being sued, shall (except in certain cases) be deemed citizens of the states where they are located. P. 256 U.S. 357. Deutsche is one of main culprits causing "Great Recession", featured bank in movie The Big Short, U. S. fined Deutsche \$7.2Billion, 60 minutes expose \$100+Billions money laundering, violated banking rules to obtain and maintain known child pedophile sex trading

Epstein account, instant case violated federal banking laws, committed first breach, fraud, etc. *** NOTE: CONTRADICTS another false claimed address to defraud courts: DBTCA is a New York state chartered banking corporation with

fiduciary powers duly organized under the laws of the State of New York. DBTCA is a wholly owned subsidiary of Deutsche Bank Trust Corporation, a New York corporation. Deutsche Bank Trust Corporation is a wholly owned subsidiary of DB USA Corporation, a corporation organized and existing under the laws of the State of Delaware. DB USA Corporation is a wholly owned subsidiary of Deutsche Bank AG. Deutsche Bank AG (DB:U.S.; DBK:GR) is a German multinational investment bank and financial services company headquartered in Frankfurt, Germany, and is dual listed on the Frankfurt Stock Exchanges and the New York Stock Exchange. Deutsche Bank AG is not a subsidiary of any parent corporation, and no publicly held corporations own 10% or more of the stock of Deutsche Bank AG. Is also operating illegally without being registered in headquarters state of New York without a registered agent in violation to U.S. Supreme Court American Bank & Trust Co. v. Federal Reserve Bank, 256 U.S. 350 (1921) to avoid taxes and accountability of juries?!!

- Frazier, Veretta Justice for originating case DC-24-05455
- Hunt, Sr., Christopher M.: Appellant; "Homeowner" Never was late on payment, has always been 100% honest, court honoring and legally right per U.S. Supreme Court, DCMG, DCNG, OCGA, federal banking laws, TROs.
- KKR Wand Investors Corporation: KKR Wand Investors Corporation, is a Delaware corporation which has no parent corporation and is not publicly held; SEC violations misallocating more than \$17 million in so-called "broken deal" expenses to its flagship private equity funds in breach of its fiduciary duty. KKR agreed to pay nearly \$30 million including a \$10 million penalty.
- MCGUIRE WOODS LLP (criminal defense) a host of attorneys for white-collar criminals Defendants.
- Mr. Cooper Inc.: Mr. Cooper Inc. (NASDQ ticker: COOP) is owned by KKR
 Wand Investors Corporation; is new rebranding attempt AKA Nationstar so
 corrupt and incompetent that still local Dallas paper was critical of name change
 without character and performance change.
- Nationstar Mortgage LLC: Nationstar Mortgage LLC is wholly owned by Nationstar Subl LLC and Nationstar Sub2 LLC. Nationstar Subl LLC and Nationstar Sub2 LLC are both wholly owned by Nationstar Mortgage Holdings, Inc., a publicly-traded company. (NYSE ticker: NSM); so bad that even name

change cannot transform admitted bad culture and costumer abuse and recently lost \$3Millions case on RESPA violations to Homeowner.

- PAXTON, KEN Texas Attorney General issued Probation and two Settlements.
- ROCKET MORTGAGE & VARUN KRISHNA CEO Purchasing Mr. Cooper so purchasing liability. How Rocket resolves will prove if worthy or just www.MrCooperCorrupt.com on rocket fuel. Mandated Defendants.

Respectfully submitted this 18th day of August 2025.

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

Christopher M. Hunt, Sr. forced Pro Se Homeowner

5456 Peachtree Blvd, #410

Chamblee GA 30341-2235 770-457-3300 1cor13cmh@gmail.com

IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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Plaintiffs	§	CASE No. 3:24-cv-01555
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KELLY DOHERTY, EVP Chief Admn	§	
ETHAN ELZEN EVP Bus. & Finance,	§	
KURT JOHNSON EVP CFO,	§	
JAY JONES EVP Servicing	§	
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CARLOS M. PELAYO EVP Chief Et. Al.	§	
ROCKET MORTGAGE (Mandated Joiner	()§	
VARUN KRISHNA CEO Rocket Mort.	§	
Defendants	_§	

VERIFIED EMERGENCY MOTION TO REOPEN CASE OR IN ALTERNATIVE NOTICE OF INTENT TO APPEAL

COMES NOW Plaintiff Rev. Christopher M. Hunt, Sr. Ph.D. ("Homeowner") forced against desires pro se by contemptuous and illegal acts of proven white-collar criminal Defendants "Mortgagees" and files this VERIFIED EMERGENCY MOTION TO REOPEN OR IN ALTERNATIVE NOTICE OF INTENT TO

APPEAL and per Wisdom "she" AKA Lady Justice who holds even scales as objective Court of equity and law, blindfolded to personalities, by wisest judge in history per famous case Solomon's Sword/Dividing the Baby Proverbs 14: "Dishonest scales are an abomination to the Lord, but a just weight is His delight. The integrity of the upright will guide them, but the perversity of the unfaithful will destroy them. When it goes well with the righteous, the city rejoices; and when the wicked perish, there is jubilation." and avers:

INTRO: ALL CITIZENS OF TEXAS AND USA CHECK THIS OUT! Posted on www.MrCooperCorrupt.com

The proven white-collar criminal Mr. Cooper is so desperate to get Mr. Cooper sold for \$9.4Billion to Rocket Mortgage and corporate officer CEO Jay Bray will make \$100+Millions in stock and the way it appears the Court's honor is being jeopardized by what appears to be a rush order to federal judge to cover up their crimes. The DCN.TX judge has shown more bias against this forced against desires 100% legally correct pro se than the justices of Dred Scott blacks! You would think a Mensa as art native indian Choctaw Nation justice Ada Brown would be empathetic to prejudiced class of litigants instead of improperly punitive! Please show Texas and U.S. nation the Court was defrauded and prejudiced by Mr. Cooper due to deceived Magistrate – who per paperwork at Removal docketing was not to even hear the case! - and due to federal court bias per honorary Judge Posner

resigned in protest "pro se are (mis)treated like trash." Please after reopen case may Judge Ada Brown seriously consider voluntary recusal and a new justice allow a jury trial for the following reasons:

- 1. Judge Ada Brown ruled within one day of Homeowner's submittal of Objections to Magistrate's Findings instead of waiting ten days for the Mr. Cooper's Response, then ten days Homeowner's Reply to Response. What should have been an almost thirty days thorough legal process was circumvented contrary to all evidence and law to be one day! Who has ever seen a judge rule on such important complex matters in one day?! See filing here:
 - https://www.dropbox.com/scl/fi/qh7ntp30upfkr7rtdefre/Objections-and-Corrections-to-Magistrate-Recommendations-DOC-DCNTX-24cv01555-11H25.pdf?rlkey=7frr745o3p9yyu9fyk5ykzusw&st=l0jrbd3d&dl=0
- 2. Homeowner had specifically stated his life was overwhelmed and he is technically challenged due to illegal abuses of Mortgagees destroying and stealing his thirty years home-based office in illegal, surprise eviction. Witness affidavit proven to Mr. Cooper's eviction crew was instructed to violate police instructions to try to destroy Homeowner out of court because was winning in courts exposing fraud on courts, etc. Eviction crews damaged and stole \$20,000+ belongings focusing on thirty years home based business

- computers, etc. Mr. Cooper eviction crews are to put household items in yard, not steal!
- 3. Magistrate had in abuse of discretion struck several of Homeowner's filings that had [DOC #] references and then deferred to Ada Brown in Findings to make a ruling on pending motion to unstrike. These filings have all important matters! When we have proper ruling to unstrike then Homeowner can due all the [DOC #] references. Homeowner bound Mr. Cooper to Candor to Tribunal and Homeowner would fill in the cited "DOC#" on any items the Mortgagees tried to refute in Response as parties were to wait for a ruling on pending motion. This maintained all rights and protections. As it is now, it appears the DCN.TX has been defrauded/manipulated by Mr. Cooper whose counsel has two senior partners in prison for corrupting government officials! Judge Brown per law and rules was to rule after Mr. Cooper Responded and Homeowner Replied.
- 4. There were two motions the Magistrate had reserved for Judge Ada Brown to rule that were not even addressed in the Order Exhibit 1. The motions were about Magistrate unstriking the proven improperly struck four +/- filings the filing clerks accepted through emergency filing system because of proven unique software glitch with DCN.TX rendering impossible to use Apple OS iPad Pro to file! It is beyond coincidence the filings have all important law

and evidence! The second motion is the all-important Mandated Joinder Parties of Rocket Mortgage as defendant since assuming all liabilities of Mr. Cooper and CFPB who with already Joinder Party Ken Paxton bound Mr. Cooper to two Federal Court orders and three years! Even Georgia appeals courts recognized Attorney General and CFPB. Mandated Joinder Party Texas AG Ken Paxton imposed the instant case matters of three years probation on Mr. Cooper and CEO Jay Bray.

5. Per Order "The Court has made a de novo review of those portions of the Findings, Conclusions, and Recommendation to which objections were made. The objections are overruled." This is literally impossible because Homeowner's main Objections were that the Magistrate had neglected to even address the main issues of lawsuit: the illegal crimes committed in Texas that are separate and distinct from Georgia! Nowhere did Magistrate address the gross willful contemptuous violations to federal court ordered two Settlement Agreements and three years Probation of more stringent requirements than law! Homeowner who had never missed a payment had demanded Mr. Cooper "produce any evidence Homeowner missed a payment and Mr. Cooper has done anything required in two Settlement Agreements and Probation to help Homeowner keep his home." Instead, it appears Mr. Cooper with \$9.4Billion purchase in progress has adversely influenced judge as their

- other counsel in Georgia has two senior partners in prison for corrupting government officials! Court's honor demands jury trial by an impartial objective Court of equity.
- 6. It is easily provable by mandated Joinder Parties Attorney General Ken Paxton and Consumer Finance Protection Bureau "CFPB" that Mr. Cooper's Georgia counsel and Texas counsel are communicating and orchestrating fraud on courts and filings despite having illegally altered the transcripts to remove admissions.
- 7. It is beyond coincidence the Georgia justice who had been replaced by a JQC justice due to Homeowner complaints after denying refusals, had a hearing despite notice to court that instant case has a motion for Ada Brown to issue an order to allow Homeowner to have a forensic court reporter review the original transcript recording and Zoom recording of hearing in 19cv10619 because Mr. Cooper and their attorneys have illegally altered the transcripts removing all-important evidence! Yes, reread that! JQC substituted judge had overruled Mr. Cooper objections and made answer! The Georgia trial judge would not have overruled the objections. The removed evidence proves per attorney explained "strategized with our clients" Mr. Cooper corporate officers in Texas. Attorney then with head lowered in shame "no it would not be proper to make filings knowingly conflicting with court authorities"

and "no it would not be proper to file into court anything that conflicted with known case history." Homeowner in his Objections has a motion request for federal court order to get the known all-important evidence in the original transcript recording and Zoom recording that Mr. Cooper illegally had removed and Georgia trial judge denied motion and reconsideration to allow a forensic court reporter to access! Ada Brown cannot legally completely ignore this and participate/enable in obvious fraud on courts!

8. RULE 3.4 FAIRNESS TO OPPOSING PARTY AND COUNSEL

- [1] The procedure of the adversary system contemplates that the evidence in a case is to be marshaled competitively by the contending parties. Fair competition in the adversary system is secured by prohibitions against destruction or concealment of evidence, improperly influencing witnesses, obstructive tactics in discovery procedure, and the like.
- A lawyer shall not: (a) unlawfully obstruct another party's access to evidence or unlawfully alter, destroy or conceal a document or other material having potential evidentiary value.
- 9. Homeowner had filed in Removal court paperwork that only a judge was to hear case, and not a Magistrate! Sadly, some unethical federal judges sometimes ask magistrates to do their dirty work in Findings then judge only has to agree with 100% legally wrong Magistrate so looks like two authorities have reviewed and reached same conclusion against a pro se. Honorable federal judge Posner resigned in protest "pro se are (mis)treated like trash." The Magistrate is nullity due to violating Homeowner's written paperwork.

10.Mr. Cooper had defrauded a District Court of North Georgia justice so badly the justice mocked Homeowner in an order! The Homeowner wrote a complaint to federal judicial ethics board and Homeowner in reconsideration gave proof positive of his complaint with result the honorable justice unrequested recused himself proving Mr. Cooper had defrauded and prejudiced the court. This instant case is much more egregious. Minister Homeowner with a Ph.D. in theology has 100% veracity about transcripts being altered because he is person behind two judges being removed by Georgia JQC for ordering their court reporters to alter transcripts in child custody modification cases. It may have been a clerk for Judge Ada Brown who did the Orders Exhibits 1 & 2 because if Judge Brown who is Mensa failed this EQ test in extreme error due fraud by Mr. Cooper prejudicing Court to rule against a pro se despite clearest irrefutable law and evidence.

11. Then on same one day after submittal of Objections that Judge Ada Brown issued the fatally flawed erroneous Dismissed with Prejudice Exhibit 1, she then issued an Order to close the case Exhibit 2 before Homeowner could file a Motion to Reconsider with all the DOC# cites! This appears a predetermined act that coincided with Georgia case illegal Bill of Peace case 19cv10619 that has the illegally altered transcript! One has to ask, "What are the odds that when Homeowner files in Georgia the final hearing has no jurisdiction because

Homeowner has a motion in Texas federal court to order the access to original transcript for evidence for DCN.TX case that the DCN.TX judge would issue a ruling in only one day that would allow the judge in Georgia 19cv10619 who refused to allow access to unedited original transcripts to grant an illegal bill of peace to have courts enable theft of home?!?!" The pending Certiorari Exhibit 3 prevented and now 19cv10619 is informed of this filing. Honorable Judge Ada Brown needs to read the Georgia Certiorari Exhibit 3 to see how the cases are distinct separate matters and how bad the fraud on courts has been perpetrated in Georgia so it refuses to participate.

12.How can judges in DCN.TX and Georgia enable Mr. Cooper's violation of probabtion to steal an entire home from Homeowner who never missed a payment when this YouTube of Texas judge sentenced a probation violator to seven years jail for violating probation by doing a simple burglary, not steal entire home with \$500,000+ equity! See a Texas case burglar gets seven years violating probation but Jay Bray CEO of Mr. Cooper violates probation stealing entire home(s) and making 100% legally right families homeless but Bray earns \$100Million+/- in stock! https://youtube.com/shorts/53aqlNSLDlk?si=M-G8IB5dxMdEaFmn

13.The Homeowner had filed a motion in objection to Georgia case that a bill of peace could not be granted until the DCN.TX had granted order to access the transcripts to get the evidence the Georgia judge has inexplicably twice denied

motions to access despite Homeowner explaining, "Court and Mr. Cooper should eagerly grant access to original transcript recordings and Zoom because if there is no evidence then they can say, "See Homeowner is a crazy litigious liar" and case is over. Instead, the adamant refusal by white-collar criminals and now corrupted, no longer graced "defrauded" judge has denied access and Justice Ada Brown refusal to even address requested order appears as serious collaboration with attorneys and judges in Georgia and Texas.

- 14. The corrupt Mr. Cooper attorney in Georgia lied to judge during hearing 8/14 accusing Homeowner of going to Texas solely to improperly misuse Court on same matters when known truth is when Homeowner discovered Mr. Cooper's illegal abuses beyond Georgia case matters were violations to two Settlement Agreements and Probation and Mr. Cooper admitted to fraud on the courts orchestrated by corporate officers in Texas he filed instant lawsuit in Texas. Mr. Cooper in Georgia 19cv10619 is asking Georgia justice to again violate federal court jurisdiction and Georgia Supreme Court jurisdiction and Judge Ada Brown is proven at least defrauded.
- 15. Ada Brown by not granting order to produce the unedited original recordings of transcript and Zoom recording of hearing is violating 28 U.S. Code § 2254 (g):

A copy of the official records of the State court, duly certified by the clerk of such court to be a true and correct copy of a finding, judicial opinion, or other

reliable written indicia showing such a factual determination by the State court shall be admissible in the Federal court proceeding.

IN CONCLUSION Homeowner in court's form specifically denied use of Magistrate and only wanted judge and jury. The Magistrate has provided fatally flawed Findings while ignoring the fundamental issues of Homeowner's Texas Complaint. Homeowner is a whistle-blower to Mr. Cooper orchestrated scheme by corporate officers and attorneys to violate court order Settlements and Probation to be enriched by hundreds of percentages ROI on homes by stealing them instead of helping homeowners save homes. Mr. Cooper cannot show one piece of requested evidence Homeowner missed a payment, no evidence it has cured USCA11 ruled breach of contract, has in any way complied with Settlement court orders and Probation. Homeowner has produced evidence of Mr. Cooper's fraud on courts, contempt and violations to extreme of attorneys admitting "strategizing with clients" Mr. Cooper in Texas headquarters how to fraud Georgia Courts to steal his home when JQC substituted trial judge overruled objections making answer. Then Mr. Cooper collaborated with attorneys to alter transcripts to remove evidence. Then defrauded/corrupted trail court denied Homeowner's Motions for a new Homeowner hired forensic court reporter to access original transcript and Zoom recording. Now Ada Brown has not only issued a false order contradicting federal court orders, all fifty states attorneys general and CFPB, evidence and law in court docket filings, but even worse refused to grant order in violation of 28 U. S. Code § 2254 (g) to get original transcript that proves instant case!

THEREFORE Homeowner prayerfully asks honorable Court:

- 1. Court Reopen Case
- **2.** Allow Homeowner to file amended Objections and Corrections with DOC #s after granting motion to unstrike the erroneously stricken filings.
- **3.** Order Mr. Cooper to answer all Interrogatories and provide all Discovery for jury trial so judge Ada Brown can see truth that Homeowner is 100% correct.
- 1. Grant Order for Plaintiff Hunt to access the original unedited court reporter transcripts and Zoom recording of 19cv10619 that has evidence for instant case and the new forensic court reporter submit verified true copies to Court. Any and all relief and benefit allowed by law and per Court's discretion.

IF NOT REOPEN CASE AND ALLOW DEFENDANTS' RESPONSE THEN HOMEOWNER'S REPLY, THEN THIS IS NOTICE OF INTENT TO APPEAL. Prayerfully and Respectfully and Submitted this 15th August, 2025.

//Christopher M. Hunt, Sr.// Electronic Signature Christopher M. Hunt, Pro Se 5456 Peachtree Blvd. #410 Atlanta GA 30341-2235 1cor13cmh@gmail.com 770-457-3300

CERTIFICATE OF COMPLIANCE

- 1. This petition complies with the type-volume limitation of Fed. R. App. P. 35(b)(2)(A) because, excluding the parts of the brief exempted by Fed. R. App. P. 32(f) this brief contains 2,402 words.
- 2. This brief complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because it has been prepared in a proportionally spaced, 14-point Times New Roman font Dated 11th July 2025

//Christopher M. Hunt, Sr.// Electronic Signature Christopher M. Hunt, Sr. Appellant Pro se

VERIFICATION

VERIFICATION

COUNTY OF DEXALB

STATE OF GEORGIA

Came before the undersigned attesting officer, authorized by law to administer caths,
Christopher Black, who, having been placed upon his oath, pursuant to law, tentified and deposed as follows:

1. My name is Christopher Black.
2. I am over the age of twesty-one years and competent in all supects to make this Verification.
3. All of the allegations in my foregoing Complaint are true and correct to help me God.
FURTHER DEFONENT SAYETH NAUGHT.

Sworm to and subscribed before me this Zyriday

of November 2024.

Affiliad

Out TALLY

AFFILIA

AF

IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

CHRISTOPHER M. HUNT, Sr	§
Ken Paxton Attorney General	§
CFPB	§
Plaintiff	§ CASE No. 3:24-cv-01555
-versus-	§
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MR. COOPER GROUP INC.	§
(NATIONSTAR) OFFICERS	§ Removed 44th District Court,
CORPORATE& INDIVIDUALLY:	§ Dallas Co. No. DC-24-05455
JAY BRAY Chairman CEO, Et Al	§
	§ JURY TRIAL
Defendants	§

CERTIFICATE OF SERVICE

I have sent a copy of this VERIFIED EMERGENCY MOTION TO REOPEN OR IN ALTERNATIVE NOTICE OF INTENT TO APPEAL Court system this 15th Aug. 2025 to:

Consumer Financial Protection Bureau1700 G St. NW Washington, DC 20552 cfpb regulatoryimplementation@cfpb.gov

Ken Paxton P.O. Box 12548, Austin, TX 78711-2548 counsel@oag.texas.gov

Justin Opitz, SBN 24051140 jopitz@mcguirewoods.com Addison Fontein, SBN 24109876 afontein@mcguirewoods.com Matthew Durham, SBN 24040226 mndurham@mcguirewoods.com MCGUIRE WOODS LLP 2601 Olive Street, Ste. 2100 Dallas, Texas 75201 Telephone: 214.932.6400 Facsimile: 214.932.6499 Sincerely,

//Christopher M. Hunt, Sr.// Electronic Signature

Christopher M. Hunt, Pro Se 5456 Peachtree Blvd. #410 Atlanta GA 30341-2235 1cor13cmh@gmail.com 770-457-3300

EXHIBIT 1 ORDER GRANT MAGISTRATE'S ERRONEOUS FINDINGS

Case 3:24-cv-01555-E-BT Document 54 Filed 08/14/25 Page 1 of 1 PageID 1486

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

CHRISTOPHER M. HUNT, SR.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 3:24-cv-01555-E-BT
	§	
MR. COOPER GROUP INC., et al.,	§	
	§	
Defendants.	§	

ORDER ACCEPTING FINDINGS, CONCLUSIONS, AND RECOMMENDATION OF THE UNITED STATES MAGISTRATE JUDGE

The Court has under consideration the Findings, Conclusions, and Recommendation of United States Magistrate Judge Rebecca Rutherford dated July 30, 2025. The Court has made a *de novo* review of those portions of the Findings, Conclusions, and Recommendation to which objections were made. The objections are overruled.

SO ORDERED, this 14th day of August, 2025.

ADA BROWN

UNITED STATES DISTRICT JUDGE

EXHIBIT 2 ORDER DISMISS PREJUDICE CASE CLOSED

Case 3:24-cv-01555-E-BT Document 55 Filed 08/14/25 Page 1 of 1 PageID 1487

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

CHRISTOPHER M. HUNT, SR.,	§	
	§	
Plaintiff,	§	
	§	
V.	§	Case No. 3:24-cv-01555-E-BT
	§	
MR. COOPER GROUP INC., et al.,	§	
	§	
Defendants.	§	

JUDGMENT

The Court has entered its Order Accepting the Findings, Conclusions, and Recommendation of the United States Magistrate Judge.

It is therefore **ORDERED**, **ADJUDGED**, and **DECREED** that the Defendants' Motion for Judgment on the Pleadings is GRANTED and Plaintiff's claims are DISMISSED WITH PREJUDICE.

SO ORDERED, this 14th day of August, 2025.

ADA BROWN

UNITED STATES DISTRICT JUDGE

IN THE SUPREME COURT OF GEORGIA

STATE OF GEORGIA

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

WRIT FOR CERTIORARI

CERTIORARI OF ACCEPTED S24A1170 COMBINED WITH NEW

CERTIORARI LATEST ORDERS FROM A25A0197 DUE CLERICAL ERORR

NEVER ADDRESSED TRANSFERRED CASE S24A1170

REQUEST RULING ALL NINE JUSTICES FOR COURT HONOR

Appellant:

Rev. Christopher M. Hunt, Sr. Ph.D. Pro Se 5456 Peachtree Blvd. Ste. 410 Atlanta, GA 30341-2235 770-457-3300

1cor13cmh@gmail.com

Request Leave of the Court to file this document and arguments contained therein were prepared in good faith and not for vexatious purposes.



March 5, 2024

The Honorable Supreme Court met pursuant to adjournment.

The following order was passed:

CHRISTOPHER M. HUNT, SR. v. DEUTSCHE BANK TRUST COMPANY.

Upon consideration of the Motion for Reconsideration filed in this case, it is ordered that it be hereby denied.

This Court notes that the petitioner, Christopher M. Hunt, Sr., filed in this Court numerous petitions for certiorari, applications, appeals, and associated motions. These filings have consistently been frivolous, procedurally defective, or improperly filed in this Court, and, as a result, they have been denied, dismissed, or transferred. Hunt's consistently improper filings constitute an abuse of the judicial system and cost courts and opposing litigants unnecessary time and trouble. Thus this Court, under its inherent power to manage its docket, hereby orders that, prior to filing any document in this Court, and within the time period provided for filing such document, Hunt must direct to the clerk of this Court the document sought to be filed, together with a statement that the document and arguments therein were prepared in good faith and not for vexatious purposes, and requesting leave to file the document. After review of the statement and submitted document, either the document will be filed in this Court, or the filing will be denied and the document returned to Hunt. A copy of

this order MUST be attached as an exhibit to any document that Hunt files in this Court hereafter.

All the Justices concur.

SUPREME COURT OF THE STATE OF GEORGIA

Clerk's Office, Atlanta

I certify that the above is a true extract from the minutes of the Supreme Court of Georgia.

Witness my signature and the seal of said court hereto affixed the day and year last above written.

Thin & Barry Clerk

CERTIORARI: TRUTH, LAW & COURT'S HONOR FINALLY PREVAIL

Trial court case of origin 18cv4742 gave jurisdiction for instant case accepted S24A1170 of collateral attack per Leave of S24C0012. S24C0012 was a simultaneous sister case wherein trial court issued an illegal supersedeas order. Georgia unconstitutionally gives a lone judge the right to grossly misuse discretion to extent illegal nullity supersedeas orders have no appeal so are misused by Mortgagees to get corrupt/defrauded courts to evict 100% legally right homeowners! That is one reason for almost slanderous required Leave of Court. S24A1170 Exhibit 4 needs a ruling so there is no doubt whether the Georgia Supreme Court wants justice for 100% legally right homeowners as much as for convicted rapist who had conviction overturned on a technicality despite criminal raped and poured boing water on a victim, all in front of children. Instant case has proven fraud on courts, a corrupted judge refused to grant order to access the original recordings of hearing because the transcripts altered to remove all important evidence the JQC substituted judge overruled objections, violations of court authorities including Supreme Court of U.S., violations of federal court jurisdictions, nullity orders violating laws, etc. Supreme Court needs to uphold its honor and rule on the clerical error by Court of Appeals and due to fraud on court by Mortgagees never addressed the issues of case. All nine justices are asked to make a ruling on this mandated accepted Certiorari

even though by forced pro se – or does Georgia mistreat pro se like infamous Dred Scott justices did blacks? See www.SupremeCourtofGeorgia.US Homeowner who never was late on a payment will not lose his \$1+Million home he built and \$500,000+ hard earned equity retirement and kids' college because of www.MrCooperCorrupt.com

OUESTIONS FOR CERTIORARI

CLERICAL ERROR: Court of Appeals clerical error changed the Supreme Court correctly docketed S25A1170 instant case of origin trial court 18cv4742 to Court of Appeals clerical error 19cv10619. Please see Exhibit 3 filing that fully addressed the clerical error but Court of Appeals erroneously denied. Homeowner complained in filings of clerical error and then only after conferring with good clerks proved the clerical error with Exhibit 3 but Court of Appeals denied due to Mortgagees violations of Rule 3.3 Candor to Tribunal. Matters of S24A1170 were never addressed despite the excellent, exhaustive Appellant's Brief that will avail justice and Homeowner be back in his home with compensation if there is a justice who cares more for Spirit and intent of law than destains pro se. Not one court has addressed the matters of accepted original certiorari S24A1170 Exhibit 4

JURISDICTION:

But the principle of party presentation, like any rule, has its exceptions. Chief among these is the threshold requirement of subject matter jurisdiction, which courts must raise on their own to protect their own jurisdiction. See, e.g., Gonzalez v. Thayer, 132 S. Ct. 641, 648 (2012) (as to subject matter jurisdiction, "courts are

obligated to consider sua sponte issues that the parties have disclaimed or have not presented"). In addition to subject matter jurisdiction ... Reviewing courts have long raised these issues on their own, since they implicate a court's competency to decide a case ... AND ... At other times, reviewing courts may be more inclined to raise and decide an issue sua sponte if they believe that the issue involves an important public concern or is "in the interests of justice," or even to protect pro se litigants. See, e.g., Real Estate Bar Association Mass., Inc. v. Nat'l Real Estate Info. Servs., 608 F.3d 110, 125 (1st Cir. 2010) (emphasizing that the issue decided sua sponte was significant to the administration of justice in the federal courts); Gramesna v. Johnson, 846 F.2d 675, 677- 78 filth Cir. 19881 (suspending the rules and raising a matter sua sponte to protect a pro se litigant!

Jurisdiction is all-important and can be raised at any time O.C.G.A § 9-12-16. All the nullity trial court orders and their contemptuous to federal court jurisdiction foreclosure against the Homeowner are void. Exhibit 4 Yet here we are again after a year of abuse and 100% legally right Homeowner almost bankrupt from forewarned irreparable damages solely due to white-collar criminals, bad acting attorneys defrauding courts, corrupted trial court and appeals court clerical errors! It seems impossible for Spirit and intent of law and truth to prevail because of courts hatred and prejudice against pro se worse than infamous racist justices of Dred Scott. Hopefully, the Supreme Court will finally avail justice. Homeowner always contended the Mortgagees never had standing to file anything and trial court never had jurisdiction to issue an order against the 100% legally correct Homeowner when the Mortgagees per MALONE et al v. FEDERAL HOME LOAN MORTGAGE CORPORATION, No. 1:2014cv00193 - (M.D. Ga. 2016) "cannot enforce any part of contract until first cure the breach." Mortgagees are prohibited from enforcing any part of the mortgage contract before they cure the USCA11 ruled, closing attorney opined, and employees admitted breach of contract. Solely due fraud on the court have Mortgagees prevailed to date. Now it is time to avail justice per Rule 60 and invoked Rule 3.3.

FRAUD ON COURTS:

Supreme Court Hazel-Atlas Glass Co. v. Hartford-Empire Co., 322 U.S. 238

Next, because of public policy, the Court rejected the Third Circuit's condonation of Hartford's fraud on the grounds of Hazel's failure to exercise sufficient diligence: This matter does not concern only private parties. There are issues of great moment to the public in a patent suit. Furthermore, tampering with the administration of justice in the manner indisputably shown here involves far more than an injury to a single litigant. It is a wrong against the institutions set up to protect and safeguard the public, institutions in which fraud cannot complacently be tolerated consistently with the good order of society. Surely it cannot be that preservation of the integrity of the judicial process must always wait upon the diligence of litigants. The public welfare demands that the agencies of public justice be not so impotent that they must always be mute and helpless victims of deception and fraud. Third, the Court challenged the Third Circuit's argument that the fraudulent conduct was not "basic' to the 1932 decision and the factual allegations in the article were actually true. Hartford persuaded the court of appeals to reverse the district court's judgment on the basis of the article and is therefore estopped from claiming it was not effective. Moreover: "The article, even if true, should have stood or fallen under the only title it could honestly have been given—that of a brief in behalf of Hartford, prepared by Hartford's agents, attorneys, and collaborators.

Similarly to Supreme Court concerns in above cited Hazel-Atlas, so instant case is not about just one senior citizen, forced pro se litigant but concerns Congressional laws and all fifty states Attorneys General and CFPB. Incorrigible Mortgagees to opine Supreme Court of Georgia make crime pay! It seems Court

cares more for confessed rapist who burned mother in front of her than a forced pro se who exposes corruption in the legal oligarchy. Here is excerpt from 18cv4742:

EVIDENCE WITH LAW SECOND AMENDED EMERGENCY MOTION TPO

Hopefully Homeowner is only temporary homeless due to improper eviction. Homeowner has all his expensive belongings in plastic tarps in yard and is sleeping in his car for four days protecting his home and typing this on rainy Sonday morning after his devotions. This filing of new evidence and law augments and does not replace or remove previous: Homeowner is trusting "objective court of equity" and per website of DeKalb Justices accolades for Honorable Judge Asha Jackson that he will be granted the TPO and move back into his home - again - until final non-appealable order from Supreme Court U.S. and after investigation from federal Consumer Fraud Protection Bureau "CFPB" and Attorney General Carr. The CFPB is working in coordination with Congressional law Sarbenes-Oxley "SOX" the Mortgagees were cause the law was passed and yet are violating it.

"While SOX is not perfect, and has not completely eliminated the misconduct that contributed to the financial meltdown of 2000-2001, it has deterred abuse. SOX dealt with problems similar to those that caused our current credit crisis: lack of due diligence, conflict of interest, and breach of fiduciary duties. Using a SOX approach, a new federal regulatory agency would be created, patterned after the Public Company Accounting Oversight Board (PCAOB) created by SOX. This new agency would promulgate sound mortgage lending practices and standards, and then it would enforce them with periodic inspections and investigations. "REGULATORY REFORM OF THE CREDIT MARKET: A SARBANES-OXLEY APPROACH Journal of Legal, Ethical and Regulatory Issues, forthcoming. By Jerry Wegman

Homeowner Defendant informs honorable Court that Deutsche and Nationstar "Mortgagees" per Settlement Agreement with CFPB and all fifty Attorneys General Exhibits 1 are "under more stringent requirements for three years starting 2021" to prevent all the illegal abuses of instant case! Mortgagees failed to inform the Court of this legal mandate and sure as hell have violated it and as they have regular laws, then defrauded the courts as a cover-up! Exhibit 1 shows instant case mortgage was one during 2011-2017 Mortgagees' purchasing spree that Homeowner discloses in video:

https://youtu.be/P2G36v7qqHc?si=A42soVjGeUvQCmR8

Appellants Brief has proof of violations of congressional laws, fraud on courts and corrupting trial court and violations of Rule 3.3 perpetrated against Homeowner.

Per Cannons it appears what is occurring YouTube George Carlin "It is a big club and you are not in it" and "they have judges in their back pocket" because Homeowner cites a case wherein an admitted criminal who raped and poured boiling water on victim mother in front of her children Court overturned his conviction due a procedural misstep, yet instant case is replete with contempt, fraud on courts, etc., by big law firm Balch and Aldridge/Pite and world's largest mortgage companies! First minute you need to see what world is thinking and instant case proving:

https://youtu.be/cKUaqFzZLxU?si=3Qo8FPikrrPDi_4s

Because Homeowner lost a \$5+MM investor due solely fraud caused errant slanderous "court orders posted online"! Instant case is directly a result of illegally substituted Deutsche and their new counsel blatantly defrauding a DeKalb magistrate judge in an illegal ex parte hearing knowingly violated federal court jurisdiction and the DCNG order! We have a trial court that has been defrauded and then corrupted so issued an illegal supersedeas Homeowner appealed to Court S24A0012 to address constitutionality of a loan county judge's ability to issue an illegal nullity order that has no appeal! Court refused to address the unconstitutional impossibility of an illegal, nullity supersedeas order that historical unconstitutional Confederate slave state Georgia has no mechanism of justice to vacate with result

100% legally right Homeowner is homeless. Emboldened corrupt Trial Court recently denied motion to access the original recordings for transcript and Zoom hearing so Homeowner can get truth of instant case to appeals court because Mortgagees altered the transcript. Even when Homeowner filed "this is perfect opportunity for Mortgagees and trial judge to prove Homeowner a crazy liar and get closure on cases by providing original recordings" it was erroneously denied thereby proving corruption. Please Court, call in the JQC! Sadly, trial court refused to let the truth become known because the Homeowner's veracity is 100% being person behind two corrupt DeKalb judges removed by JQC for having their court reporters alter the transcripts. Justices of Supreme Court with all the eFile categories concerning JQC can launch an investigation into all the fraud and corruption and facilitate justice. Ask Mortgagees to produce one piece of evidence Homeowner ever missed a payment! Ask Mortgagees any evidence they have not violated two settlement agreements three years probation.

INTRODUCTION

The words of Chief Justice Marshall in Marbury v. Madison, 5 U.S. 137 (1803), must be heeded:

"The very essence of civil liberty certainly consists in the right of every individual to claim the protection of the laws, whenever he receives an injury. One of the first duties of government is to afford that protection. The government of the United States has been emphatically termed a government of laws, and not of men. It will certainly cease to deserve this high appellation, if the laws furnish no remedy for the violation of a vested right."

Homeowner timely filed the initial certiorari but made a correctable technicality error of citing wrong case of original as both cases were simultaneously before Court due to Mortgagees perpetrating contemptuous illegal acts trying to destroy 100% legally correct Homeowner out of court since losing in courts. The first attempted certiorari was force filed to make the deadline while Homeowner was waiting for a ruling on his motioned Court of Appeals to reopen the case because of new evidence discovered while researching case for certiorari. Exhibit 3 thoroughly explains instant Certiorari. Again, the Mortgagees violated Rue 3.3 and committed fraud on the courts by not disclosing to Court of Appeals the truth of clerical error but perpetuated the clerical error to prevent Court of Appeals from making Mortgagees address the issues of case of origin 18cv4742 in the original Appellant's Brief collateral attack. This Application for certiorari is timely as the July 11 Orders Exhibit 1A with 1 B & C still ongoing and being readdressed instantly because of Homeowner's innocent pro se technicality misunderstanding of procedures in a case compared to Mortgagees' court shaming and dishonoring egregious fraud on courts, contempt, illegal acts perpetrated on the Court of Appeals and this honorable Court.

Mortgagees violations of Rule 3.3 with fraud on courts adversely effecting machinery of justice thwarting correcting of the clerical error.

Rule 3.3 a. A lawyer shall not knowingly:

- 1. make a false statement of material fact or law to a tribunal;
 - Mortgagees promoting case was falsely 19cv10619
- 2. fail to disclose a material fact to a tribunal when disclosure is necessary to avoid assisting a criminal or fraudulent act by the client;
 - Mortgagees and counsel were "strategizing" in violations to two settlement agreements and three years probation imposed by all fifty states Attorneys General and CFPB.
- 3. fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel; or
 - Mortgagees refused to admit to Court of Appeals instant case concerned 18cv4742 but kept misrepresenting 19cv10619 to avoid issues of Brief.
- 4. offer evidence that the lawyer knows to be false. If a lawyer has offered material evidence and comes to know of its falsity, the lawyer shall take reasonable remedial measures.
 - Mortgagees incorrigibly kept telling Court of Appeals instant case was trial court 19cv10619 and denying it was 18cv4742.

Certiorari is a matter of first impression in any court, a definitive ruling free of fraud on courts and violations of Rule 3.3 is necessary for all Georgia Courts for two reasons as instant case is identical to *Malone*, except for fraud on courts! Since Court is always "jurisdiction" it is the Mortgagees who never had any legal right to try to enforce any part of the contract until they cured their USCA11 ruled and employees and closing attorney admitted breach of contract! Therefore, no court had any jurisdiction to rule against homeowner or grant a contemptuous wrongful foreclosure, grant illegal, contemptuous dispossessory, nor itself illegal supersedeas!

1. In light of MALONE et al v. FEDERAL HOME LOAN MORTGAGE CORPORATION, No. 1:2014cv00193 - (M.D. Ga. 2016) DOC 29 pp 6-12: As to the Malones' breach of contract claim against Bank of America, Defendants argue the claim is barred by the six-year statute of limitations on simple written contracts under O.C.G.A. § 9-3-24. (Doc. 25 at 4-5.)

In response, the Malones argue the applicable statute of limitations is twenty-years under O.C.G.A. § 9-3- 23 because the contract they seek to enforce -the security deed executed by the Malones to Nationwide -is a sealed instrument... The contract the Malones alleged was breached is the August 2007 security deed they entered into with Nationwide... to assert a wrongful foreclosure claim, the Malones must "establish a legal duty owed to [them] by the foreclosing party, a breach of that duty, a causal connection between the breach of that duty and the injury [they] sustained, and damages." Heritage Creek Dev. Corp. v. Colonial Bank, 601 S.E.2d 842, 844 (Ga. Ct. App. 2004); see also McCarter v. Bankers Trust Co....(And p. 13 same instant case!!!): Court finds that the Malones have stated a wrongful foreclosure claim for breach of the duty of good faith. The Malones have alleged that they made every payment when owed except for those that Bank of America would not accept... Where a party seeks to recover damages for the value of the property, the party may not also seek to set aside or cancel the foreclosure. Clark v. West, 395 S.E.2d 884, 885 (Ga. Ct. App. 1990). However, where a party seeks cancellation of the foreclosure in order to recover the property in addition to damages for "other breaches of duty and other losses," an action for both, equitable relief and damages for wrongful foreclosure may proceed. Id....(and p. 14) The Court finds that the Malones' allegations that they have at least tried to tender the full amount due but that Bank of America has refused to accept their payments are sufficient to state a claim for equitable relief....

While trying to learn how the Certiorari should be formatted, I saw where Court recently granted a Certiorari on a case where a woman with her young kids in the house was raped and scarred by boiling water and the Certiorari was granted to the admitted guilty criminals because of a legal procedure in trial S21C0949, S21G0949 PALENCIA v. THE STATE. While incomparable in human suffering of that victim (Jesus please help woman and children heal in every way and criminals repent so not go to hell) to instant case, also incomparable are the severity of instant case violations of laws and procedures to the minor singular procedural error understanding and agreeing the protection of innocent is important - remembering instant case has 100% legally right Homeowner who built home, raised children, made perfect payments until Mortgagees court affirmed breach of contract represents hundreds of thousands of homeowners in Georgia and millions in USA losing homes to proven sociopathic, greedy, white-collar criminal Mortgagees. Certiorari concern violations of laws and court errors foundational to court procedures for justice to prevail. Petition for Certiorari is in agreement with U. S. Supreme Court:

The words of Chief Justice Marshall in Marbury v. Madison, 5 U.S. 137 (1803), must be heeded: "The very essence of civil liberty certainly consists in the right of every individual to claim the protection of the laws, whenever he receives an injury. One of the first duties of government is to afford that protection. The government of the United States has been emphatically termed a government of laws, and not of men. It will certainly cease to deserve this high appellation, if the laws furnish no remedy for the violation of a vested right."

IN CONCLUSION the Certiorari must be granted so this case can finally be resolved. Please see for record the original Amended Certiorari for The clerical error, fraud on courts, no jurisdiction are proven. The original Appellant's Brief will have all exhaustive truth and laws cited. See mandated Joinder party Rocket Mortgage and CEO Krishna Exhibit 5 and mailed service. PLEASE SEE EXHIBIT 2 pages 21-23 and pray about how you should rule.

THEREFORE Homeowner prays court grants certiorari and avails justice per original Amended Certiorari that was accepted but matters never addressed.

Respectfully Submitted this 20th day of July, 2025.

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

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

5456 Peachtree Blvd. 410

Chamblee, GA 30341-2235

770-457-3300 1cor13cmh@gmail.com

CERTIFICATION WORD COUNT RULE 24

Filing conforms to Rule 24 in Times New Roman Font 14 having 3,328 words.

IN THE SUPREME COURT OF GEORGIA STATE OF GEORGIA

DEUTSCHE BANK TRUST CO. §

AMERICAS, AS TRUSTEE § Supreme Court

MR. COOPER/NATIONSTAR § Previous:

CEDTIEI	CATE OF SE	DVICE
	§	
Defendant/Appellant	§	18CV4742-2
	§	DeKalb Case:
CHRISTOPHER M. HUNT, Sr.	§	
	§	
V.	§	A25A0197
	§	Court of Appeals
Plaintiffs/Appellees	§	
	§	S24A1170

CERTIFICATE OF SERVICE

I have sent a copy of this petitioner's WRIT FOR CERTIORARI CERTIORARI OF ACCEPTED S24A1170 COMBINED WITH NEW CERTIORARI LATEST ORDERS FROM A25A0197 DUE CLERICAL ERORR NEVER ADDRESSED TRANSFERRED CASE via email court system to suffice for service Rule 6 emailed per previous agreement with other parties original 7/20 July, two more times & this 10 August 2025

<u>gwallach@aldridgepite.com</u> divey@aldridgepite.com Aldridge, Pite, LLP Fifteen Piedmont Court 3 575 Piedmont Road NE Suite 500 Atlanta, GA 30305

Brooke Gram bgram@balch.com Patrick Silloway silloway@balch.com Balch and Bingham LLP 30 Ivan Allen Jr. Blvd. NW Suite 700 Atlanta, GA 30308

Attorney General Chris Carr 40 Capitol Square, SW Atlanta, GA 30334 Consumer Finance Protection Bureau 40 Capitol Square, SW Atlanta, GA 30334 Mandated Joinder Party CEO Varun Krishna and Rocket Companies, Inc. 1050 Woodward Avenue, Detroit, MI 48226-1906

The Honorable Gail Slater Assistant Attorney General Antitrust Division Dept. Justice 950 Pennsylvania Avenue NW Washington, DC 20530

The Honorable Andrew N. Ferguson Chair Federal Trade Commission 600 Pennsylvania Avenue NW Washington, DC 20580 //Christopher M. Hunt, Sr.// (electronic signature)
Christopher M. Hunt, Sr. Pro Se 5456 Peachtree Blvd. #410 Chamblee Georgia, 30341-2235 1cor13cmh@gmail.com (770) 457-3300

EXHIBITS 1A-C, ORDERS BEING APPEALED

Court of Appeals of the State of Georgia

The Court of Appeals hereby passes the following order:

A25A0197. CHRISTOPHER HUNT v. DEUTSCHE BANK TRUST COMPANY et al.

Upon consideration of the APPELLANT'S "Emergency Motion to Reopen Case" and "Notice to Court with Motion Mandated Joinder Party Rocket Mortgage and CEO Varun Kishna" in the above styled case, it is ordered that these motions are hereby DENIED.



Court of Appeals of the State of Georgia Clerk's Office, Atlanta, 07/11/2025

I certify that the above is a true extract from the minutes of the Court of Appeals of Georgia.

Witness my signature and the seal of said court hereto affixed the day and year last above written.

Christinia Colay Frank, Clerk.

EXHIBIT 1B

Court of Appeals of the State of Georgia

ATLANTA, June 23, 2025

The Court of Appeals hereby passes the following order

A25A0197. CHRISTOPHER HUNT v. DEUTSCHE BANK TRUST COMPANY et al .

Upon consideration of the APPELLANT'S Motion for Reconsideration in the above styled case, it is ordered that the motion is hereby DENIED.



Court of Appeals of the State of Georgia Clerk's Office, Atlanta, June 23, 2025.

I certify that the above is a true extract from the minutes of the Court of Appeals of Georgia.

Witness my signature and the seal of said court hereto affixed the day and year last above written.

Christina Coly Fruit, Clerk.

EXHIBIT 1C

Court of Appeals of the State of Georgia

ATLANTA, June 23, 2025

The Court of Appeals hereby passes the following order

A25A0197, CHRISTOPHER HUNT v. DEUTSCHE BANK TRUST COMPANY et al.

Upon consideration of the APPELLANT'S motion FOR PERMISSION TO FILE A SECOND MOTION FOR RECONSIDERATION in the above styled case, it is ordered that the motion is hereby DENIED.



Court of Appeals of the State of Georgia Clerk's Office, Atlanta, June 23, 2025.

I certify that the above is a true extract from the minutes of the Court of Appeals of Georgia.

Witness my signature and the seal of said court hereto affixed the day and year last above written.

Christina asley Anish, Clerk.

EXHIBIT 2 NEVER RULED! LOOK AT SUBJECT MATTER!

COURT OF APPEALS

STATE OF GEORGIA

DEUTSCHE BANK TRUST COMPANY	§	
AMERICAS, AS TRUSTEE	§	APPEALS COURT CASE:
	§	A25A0197
Plaintiff/Appellee	§	
	§	SUPREME COURT
V.	§	S24A1170
	§	
CHRISTOPHER M. HUNT, Sr.	§	
CHRIS CARR, ATTORNEY GENERAL	§	Cross Filed Origin Case
CONSUMER FINANCIAL PROTECTION	§	DeKalb Cases:
BUREAU	8	18cv4742
Defendants/Appellants	§	

EMERGENCY INTERLOCUTORY APPEAL
APPELLANT MOVE BACK INTO HIS HOME UNTIL FINAL
NON-APPEALABLE ORDER

who never missed a payment forced pro se and homeless due to illegal and contemptuous damages from temporary theft of \$1+M home with \$500,000+ equity and files this EMERGENCY INTERLOCUTORY APPEAL APPELLANT MOVE BACK INTO HIS HOME UNTIL FINAL NON-APPEALABLE ORDER per Wisdom AKA blindfolded Lady Justice of Spirit and intent of U.S. Constitutional law and wisest judge of famous "Dividing Baby/Solomon Sword" case today's Biblical Proverbs 25 "Take away the dross from silver, and it will go to the silversmith for jewelry. Take away the wicked from before the judge, and the bench will be established in righteousness. Do not go hastily to court; for what will you do in the end, when your neighbor has put you to shame? If your enemy is hungry, give se (she/he) bread to eat; and if thirsty, give water to drink; For so you will heap coals of fire on se's head and the Lord will reward you." and avers:

Interlocutory injunction is device to keep parties in order and prevent one from hurting the other while their respective rights are under adjudication. Milton Frank Allen Publications, Inc. v. Georgia Ass'n of Petro. Retailers, 223 Ga. 784, 158 S.E.2d 248 (1967).bSole purpose for granting interlocutory injunctions is to preserve status quo of the parties pending a final adjudication of the case. Metropolitan Atlanta Rapid TransitbAuth. v. Wallace, 243 Ga. 491, 254 S.E.2d 822 (1979).

EMERGENCY INTERLOCUTORY APPEAL IS ONE YEAR NOT RULED

Honorable Court of Appeals justices please be advised that 100% legally

right Homeowner has been homeless for a year and day to day almost bankrupt while living in a car and working in public WiFi places. Senior citizen minister who has helped homeless and taken homeless into home has his feet and legs swelling from not laying down for months at a time. This illegally abuse is completely unnecessary because Homeowner has filed into trial court that if there was a final non-appealable order he had lost his home due to white-collar criminals and and bad acting attorneys he fraud if/corrupting the courts he would voluntarily move out in thrifty days. despite this filed promise the Appellees and their bad acting debt collecting attorneys in contempt of the jurisdiction of both United States Supreme Court and Supreme Court of Georgia did an illegal eviction deceiving the attorney over sheriffs as they did in past the DeKalb magistrate judge to get an illegal, contemptuous to DCN.GA court order eviction. That eviction was proven rightly reversed. Now Mortgagees are dishonoring the honorable court making you look like callous, corrupt cronies because the emergency motion to allow Homeowner back into his home has been languishing for more than a year while Homeowner has prayerfully remained respectful hoping for justice!

The Mortgagees would be well served to show compassion and in a good act of grace in preponderance of caution *not* object to Homeowner moving back into his home in light of all CEO Mr. Bray, who professes to be a Christian and Mr. Cooper promises all the past wrongdoings resulting in two Settlement Agreements

and three years probation more stringent requirements were accidents, and Mr. Cooper (Nationstar and Deutsche) promotes and promises on websites of homeowners being their partners in homeownership.

Please see what everyone on street sees:

- 1. Proven Homeowner never missed a payment.
- 2. USCA11 ruled the Mortgagees breached the contract.
- 3. Proven eviction was in contempt of appellant court**S** jurisdiction.
- 4. Minister Homeowner had filed he would peaceful move out of the home he built, raised family and had home based business for thirty+ years on his own accord within thirty days if there was an unlikely final non-appealable order he lost his home.
- 5. Homeowner was talking excellent care of his home that was appreciating with no liability or responsibility to Mortgagees and he carried renters insurance.
- 6. Homeowner over this year has has \$1,000s belongings locked in home unaccessible. Homeowner still has utilities in his name, cuts the grass, cares for all landscaping, etc. Homeowner has managed his home much better than Mortgagees to extent after pleas to Mortgagees to secure home from rodents and insects due open garage door and be allowed to put space heaters in home so water pipes not freeze the Homeowner had to file emergency motions to finally be able to save his home from \$10,000s of damages. The house garage door was damaged by

someone and other issues of neglect. Homeowner weekly checks on his home.

- 7. All this time Mortgagees, wealthy attorneys and Court justices have generous salaries and nice homes and beds to sleep while Homeowner has gone through freezing nights without a bed in day-to-day stress surviving.
- 8. Court knows case is many months away from being settled for Homeowner by all evidence and mandated jointer parties so please show half the compassion and mercy you show convicted criminals who make appeals while living in comparatively comfortable prisons with free meals. Seriously, Homeowner has has maximum security clearance for prison ministry and bad acting guilty convicts in prison live better than senior citizen, Ph.D. theology (WWW.GODISLOVE.CHURCH) MA counseling who for GSU while carrying a 4.0 double major established a practicum counseling site in Riches Academy an inner city school for At Risk Youth who were expelled or dropped pout of public schools, wants to launch P.E.A.C.E. Prisoner Education And Character Enhancement (don't let me back in my house and some of you will be going through program!) www.MLKStoneMountain.com, etc. but instead is spending time fighting for his home so all the people who being helped their blood and heartache be on each of you for what you are doing in greedy callous indifference.

9. Homeowner working from his home that he built in subdivision he developed is advantageous for business instead of being freaking homeless having to avoid entire topic!

IN CONCLUSION Homeowner Ask Court rule on overripe Injunction to allow Homeowner back in his home and Mortgagees defer to Court without objection.

THEREFORE Homeowner prays this honorable Court grant:

1. PLEASE ALLOW SENIOR CITIZEN BACK INTO HIS HOME!!!

Any and all additional benefits and relief per Court's discretion,

Respectfully Submitted this 25th day of April, 2025.

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

EXHIBIT 3 PROOF CLERICAL ERROR

COURT OF APPEALS

STATE OF GEORGIA

DEUTSCHE BANK TRUST COMPANY	§
AMERICAS, AS TRUSTEE	§ APPEALS COURT CASE:
	§ A25A0197
Plaintiff/Appellee	§
	§ SUPREME COURT
V.	§ S24A1170
	§
CHRISTOPHER M. HUNT, Sr.	§
CHRIS CARR, ATTORNEY GENERAL	§ Origin
CONSUMER FINANCIAL PROTECTION	§ DeKalb Case:
BUREAU	§ <u>18cv4742</u>
Defendants/Appellants	§

EMERGENCY MOTION TO REOPEN CASE PER GA R. 120-2-2-.44 1 a, c. 2 a, b, 3 a, b, c DUE NEW EVIDENCE FROM CLERKS OF COURT R. 120-2-2.31 WITH SINCERE APOLOGY TO COURT

PETITIONER Rev. Christopher M. Hunt, Sr. Ph.D. Appellant, Pro Se 5456 Peachtree Blvd. Ste. 410 Atlanta, GA 30341-2235 770-457-3300 1cor13cmh@gmail.com

COMES NOW Petitioner "Homeowner" forced pro se after never missing a payment but now homeless due to Mortgagees illegal and contemptuous damages—and temporary theft of \$1+M home with unavailable \$500,000+ equity and files this EMERGENCY MOTION TO REOPEN CASE PER GA R. 120-2-2-.44 1 a, c. 2 a, b, 3 a, b, c DUE NEW EVIDENCE FROM CLERKS OF COURT R. 120-2-2.31 WITH SINCERE APOLOGY TO COURT per Wisdom AKA Lady Justice of Spirit and intent of U.S. Constitutional law Wisdom AKA blindfolded Lady Justice and wisest judge of law school famous "Dividing Baby/Solomon Sword" case Biblical Proverbs 29: "When the righteous are in authority, the people rejoice; But when the wicked rules, the people groan. Transgressions cause the evil to be snared, but the righteous sings and rejoices. The righteous considers the cause of the poor, but the wicked does not understand such knowledge. Judges who adjudicates

the poor with truth, their bench will be established forever. Many seek the judge's favor, but justice for people comes from the Lord." and avers:

INTRODUCTION: SINCERE APOLOGY

Rev. Christopher M. Hunt, Sr. Ph.D. sincerely apologizes to Court for being so strong in extorting Court to rule righteously. In rereading his Motion to Reconsider Homeowner is sincerely appreciative for the Court's restraint in apparent empathy of the amount of pain, suffering and hardship senior citizen has endured to extent homelessness solely due to crimes of incorrigible white-collar criminal Mortgagees and their bad acting bill collecting attorneys in contempt and defrauding courts against against 100% legally right Homeowner in violation to two settlement agreements and three years probation imposed by all fifty states attorneys general and Consumer Finance Protection Bureau. Regardless, Homeowner should have used more restraint and sincerely apologizes God's Word James 1:20 "the rage of man does not accomplish God's will." Homeowner asks forgiveness.

1.
NEW EVIDENCE PROVES CLERICAL ERROR & ANOTHER VIOLATION OF RULE 3.3 BY
MORTGAGEES EFFECTING MACHINERY OF JUSTICE

Homeowner enjoyed thorough conversations with excellent, transparently honest clerks of both Supreme Court and Court of Appeals while tracking down exactly where the complained clerical error occurred in instant case while preparing for his certiorari to Supreme Court. Additionally, it is exciting Court still has opportunity to correct the error before end of term July 2, 2025.

The clerical error was discovered during the conversations with various clerks who will not be disclosed so Mortgagees and their bad acting attorneys cannot interfere in any way, as they have defrauded and corrupted the trial court and federal courts, but Homeowner advises justices start with attorney Christina Smith, Clerk of Court whom Homeowner is confident cannot be compromised.

This EMERGENCY MOTION TO REOPEN CASE PER GA R.120-2-2-.44 1 a, c. 2 a, b, 3 a, b, c

DUE NEW EVIDENCE FROM CLERKS OF COURT R. 120-2-2.31 is mandated granted.

History and Case Paper Trail

Instant case A25A0197 is undisputed transferred from S24A1170. As Court correctly pointed out in its 23 June 2025 Order the Homeowner kept claiming case was exclusively DeKalb County Superior Court 18cv4742 and not secondary and dependent 19CV10619. The Mortgagees full well knew this fact by case history but chose to again violate Rule 3.3 by instead of acting as sworn officers of court and help correct the clear clerical error, the white-collar criminal Mortgagees and their Court shaming attorneys defrauded the Court by perpetuating the error because as Homeowner filed they are desperate not to be forced to answer for all the matters in the Supreme Court file stamped S24A1170 Appellant Brief, showing origin case as only 18CV4742. The Clerk of Supreme Court confirmed everything about S24A1170 is only 18CV4742.

Homeowner had filed a previous appeal from 18cv4742 that became A23A0378, then Supreme Court S24C0012 then Certiorari to Supreme Court of. U.S. The appeal addressed the constitutionality of a lone, at best defrauded trial court judge can issue a proven illegal, nullity supersedeas bond that in Georgia has no appeal until the purposefully fraud excessive supersedeas amount was paid. Nowhere in USA is one lone lower court judge allowed to make a non-appealable final order! Even when the since proven corrupt lawfare NY case against Trump tried same illegal supersedeas trick against Trump, the state of New York had a mechanism of review. The review resulted in bond ruled excessive, so bond reduced and Trump paid with result of appeal is the entire illegal lawfare case being overturned! Homeowner instant case is similarly abused by trial court but never got the constitutional right for a review of the illegal and excessive supersedeas bond. While S24C0012 was in jurisdiction of Supreme Court of Georgia, the Homeowner filed instant case of collateral attack on matters the Supreme Court had jurisdiction so collateral attack could be filed into Supreme Court. Instant case was a direct appeal bypassing Court of Appeals and filed as S24A1170 with origin case DeKalb County 18cv4742.

The Supreme Court denied the S24C0012 case. Homeowner saw a national conflict so important it was effecting the now president Trump and believed the Supreme Court of U.S. would finally grant certiorari and justice to save his home. Homeowner has spent almost \$20,000 just on special publishing for his three strong certioraris to Supreme Court of U.S. hoping to help all homeowners in U.S. who had been financially devastated by the illegal acts of Mortgagees causing the Great Recession that instant case is a carryover. When the \$24C0012 case left the Supreme Court of Georgia that left the \$24A1170 case of collateral attack

with TPO against contemptuous, illegal eviction remaining in the Supreme Court of Georgia waiting for a ruling.

While all these 18cv4742 cases were going through appeals, the Mortgagees affirmed they knew this because they had twice agreed with Homeowner their DeKalb 19cv10619 Bill of Peace case could not be finalized until the precedent matters of 18CV4742 were resolved. The hearing for 19CV10619 was delayed twice then they decided to have hearing and await rulings pending outcome of certioraris with all jurisdiction in Supreme Courts of U.S. and Georgia. During the 19cv10619 hearing for preposterous Bill of Peace that was hosted by a the JQC substituted judge who did not realize how corrupt the Mortgagees and their bad acing counsel had been so overruled their objections and made them answer two questions that proved Homeowner's case because the questions in 19CV10619 concerned billings from the 18CV4742. Yes, the greedy bastards to Bar wanted 100% legally right homeowner to pay them for contemptuously and illegally stealing his home instead of curing their USCA11 ruled breach of contract. Because the judge granted the bill of peace the Homeowner filed an appeal for nullity 19CV10619 and asked for the 19CV10619 to go directly to Supreme Court due to issues to be addressed. The hearing by grace of God and Wisdom as Jesus teaches when before the judges do not worry about what to say, just pray and obey and that is what Homeowner did that resulted in the truth coming out during 19CV10619 hearing that Belch Balch attorney "strategizing with clients" how to defraud trial court to overcome Homeowner's filings with head lowered in shame twice as Zoom will show admitted what they did in 18CV4742 "Yes that would be improper". The Mortgagees then caused additional fillings and delays in the appeal of 19CV10619 because they ordered their court reporter to alter the transcript! And the previously "at best defrauded trial court" proved corrupted because she was denying orders to make the original transcript recording available and access to the Zoom recording! These are now matters for Attorneys General of Georgia Chris Carr and Ken Paxton of Texas and CFPB and JQC.

Unbeknownst to Homeowner the appeal of 19CV10619 was not being held waiting for the true accurate transcript to be produced but had been forwarded to the Supreme Court. *This is where the clerical errors occurred*.

The Supreme Court had case S24A1170 of collateral attack case and Homeowner's Brief filed and stamp filed. Homeowner was waiting for the Appellees to file their Brief in the Supreme Court. But then the

Supreme Court ruled they did not have jurisdiction (?because the other case was then in Supreme Court of U.S.) so were transferring S24A1170 to the Court of Appeals. It was during this same time the appeal of 19CV10619 arrived into Supreme Court but clerk had not yet given the newly arrived 19CV10619 case a case number. The new, separate, distinct appealed 19CV10619 case should have been docketed with its own case number different from the S24A1170. When the clerk for Court of Appeals "pulled the case" S24A1170 from the Supreme Court the clerk in error pulled the yet unnumbered wrong case information seeing only the DeKalb Notice of Intent to Appeal was going into the Supreme Court and mistakenly combined the existing appealed S24A1170 from 18CV4742 - that Supreme Court clerk stated is clearly all 18CV4742 with no 19CV10619 - and with the S24A1170 all the new not yet case number assigned 19CV10619 case information from 19CV10619 and mistakenly combined both cases as the one instant case A25A0197. This is what was so upsetting to Homeowner who was daily suffering forewarned irreversible damage begging for justice of injunction to void the illegal, contemptuous surprise eviction and be allowed back in his home with honest, hard work earned \$500,000+ equity for his retirement and kids college education that is being stolen!!! Homeowner had a thirty years home based business that he could show people the \$1,000,000+ home he built in subdivision he developed and named after his daughter. Now he is freaking homeless and losing business!

All clerks have agreed with the basic new reverse engineering what has occurred and was only discovered while forced to try to prove why Supreme Court should grant yet another new certiorari caused by Mortgagees fraud on court and violations of Rule 3.3 and all the illegal evils in the Appellants Brief for S25A0197 that is truly solely 18cv4742! The Appeal of 19CV10619 should have been assigned a separate distinct case number in Supreme Court but the clerk for Court of appeals in clerical error "pulled" the wrong case information and combined cases! Please research: Homeowner never was sent the notice 19CV10619 was docketed with new case number and had certain time to file Appellant Brief!!!

JAY BRAY CEO PERSONALLY KNOWS ALL FACTS OF MISCONDUCT AND AND PER ATTORNEYS IN 19CV10916 HEARING IS ORCHESTRATING FRAUD "Strategizing with clients" all illegal acts in instant case 18CV4742!!! Now Mr. Cooper is being bought by Rocket Mortgage and Jay Bray is to personally make \$100+/- MILLION while orchestrating fraud on courts and violations of three years probation and contempt to two settlement agreements after being fined \$200Million by all fifty states attorneys general

and CFPB!!! Worse Jay Bray is to be elevated to be over the new enlarged mortgage division of Rocket

Mortgage. Must watch at 1:45+ about to repeat instant case to all those cases:

https://youtu.be/V_jjKJA9dVg?si=S0-wRXPKO3eD6DKj

https://youtu.be/j1jJoXv10dE?si= bEyX2PgrHiESZDL (see claims @4-9 minutes that Jay Bray and Mr.

Cooper are the antithesis!!!)

See Homeowner YouTube instant case:

https://youtu.be/P2G36v7qqHc?si=dtWAt9Z3RtcuaPV2

Excerpt from emails to counsel:

Justin Opitz, SBN 24051140 Addison Fontein, SBN 24109876 Matthew Durham, SBN

2404022 Attached will be filed with minor modification into Texas case. Call me to settle so we have agreement by this Friday June 27th.

I will be posting on new www.MrCooperCorrupt.com with new website domain for Rocket Mortgage and Krishna.

This will end and you have the ability help your client wisely, peacefully settle. What a freaking hypocrite Jay Bray is to get on YouTube and talk about prioritizing homeownership and he's making personally probably at least \$100 million from this deal while you know illegally making me homeless trying to steal my home.

Call 770-457-3300

Create a Blessed Day!

Christopher

Please Grace Typos Mobile

----- Forwarded message ------

From: Christopher Hunt <1cor13cmh@gmail.com>

Date: Sun, Jun 22, 2025 at 8:36 PM

Subject: SETTLE Fri 6/27 or Rocket Mortgage & Krishna Mandated Joinder Party

To: Brooke Gram < bgram@balch.com >, Dallas Ivey < divey@aldridgepite.com >, Gregory Wallach

<a href="mailto:square: mailto:square: mailto:squar

As forewarned, since settlement offers rejected, this is being forwarded to all the regulators responsible for allowing the \$9.4 Billion Rocket Mortgage purchase of Mr. Cooper, and attorneys general and CFPB. Homeowner is not suicidal and more determined than ever for justice and to save other homeowners! Jay Bray should be in jail, not be promoted to be over one of largest mortgage providers in U.S.! Several times Homeowner personally sent registered mail pleas to Jay Bray and emails to attorneys asking them to ask Mr. Bray to honor courts and law by settling! Mr Bray on company website professes to be a Christian who wants to partner with homeowners and all past wrongs were merely accidents due to be company being overwhelmed. BS - they have algorithms for stealing the homes with most equity! What a sociopathic, greedy hypocrite to want to partner with homeowners while defrauding courts and refusing to cure the 11USCA ruled breach of contract, continues violations and contempt, refuses to allow senior citizen, Christian minister (www.GodlsLove.church that close up messages with gold curtain are recorded in storage unit) back in his home. Now it will be title free and clear and cash for damages, Jay Bray personally give Homeowner some of new Rocket Mortgage stock of combined companies and Jay Bray never be allowed to service mortgages again and someone ethical be over Rocket Mortgage.

Per Footnote on page 2 of nullity Order: 2 Hunt originally filed this case in the Supreme Court of Georgia, which transferred the case here for lack of jurisdiction. See Case No. S24A1170 (Jul. 16, 2024). (*NOTE: S24A1170 is 18cv4742 Exhibit (*Truth Rejected so see Motion to Supplement the Record)

And quote pg 4:

Second, although unclear, Hunt's brief appears to challenge the standing of the Banks to foreclose on and initiate dispossessory proceedings on his property.

Those issues appear to relate to Superior Court of DeKalb County, Case No.

18CV4742-2. However, the instant appeal is from an order entered in Case No.19CV10619

FOOTNOTE:

³ Hunt's reply brief, filed pursuant to Court of Appeals Rule 23 (c), expressly states "Homeowner cannot be more clear his appeal is addressing the eviction (<u>18cv4742</u>) and not the forthcoming Bill of Peace (<u>19cv10619</u>) that will be vacated." (*Note: Proves Homeowner was unaware 19cv10619 had arrived into Supreme Court because not yet given and #! And no notice!)

THEREFORE Homeowner prays this honorable Court grant:

- 1. Reopen the case and then vacate the 5/20 Order per evidence instant case Brief, exhibits, Motion to Supplement the Record Reconsider, etc.
- 2. Order Appellees per invoked Rule 3.3 to address all the complaints in original Appeal filing 18cv4742 that are being avoided with preposterous excuse case is about dependent 19cv10619! Since dependent19CV10619 requires jurisdiction and standing for Appellees and COURT, all must be answered. Can have closed chambers meeting and attorneys honor Rule 3.3 tell truth to Court,
- 3. Grant Homeowner back into his home with \$50,000 for illegal eviction and theft of belongings in contempt of jurisdictions of Supreme Courts of U.S. & Georgia and fraud on courts, etc.
- Allow Attorney General Carr and CFPB file into case before any more rulings so Spirit and intent of U.S. law, justice and truth prevail.

Any and all additional benefits and relief per Court's discretion,

Respectfully Submitted this 30th day of June, 2025.

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

Rev. Christopher M. Hunt, Sr. Ph.D. 5456 Peachtree Blvd. 410 Chamblee, GA 30341-2235 770-457-3300 1cor13cmh@gmail.com

Exhibit 4 Excerpt showing trial court has made obtaining justice impossible

FILED 2/27/2025 2:54 PM CLERK OF SUPERIOR COURT DEKALB COUNTY GEORGIA

DEKALB COUNTY SUPERIOR COURT

STATE OF GEORGIA

CHRISTOPHER M. HUNT, SR	§	
m :	§	G N 10G111712 2
Plaintiff	8	Case No.18CV4742-2
	Š	
NATIONSTAR MORTGAGE	§	
DEUTSCHE NATIONAL TRUST	§	
ALBERTELLI LAW	§	
	8	

EMERGENCY EXTRAORDINARY MOTION TO REOPEN CASE PER GA. COMP. R. & REGS. 120-2-2-.44 WITH MOTION TO SET ASIDE PER §9-11-60

COMES NOW Plaintiff Christopher M. Hunt, Sr. "Homeowner" forced

against desire pro se and files into this honorable Court per Wisdom "she" AKA Lady Justice of wisest judge in history per "Solomon's Sword" case "Getting treasures by a lying tongue is the fleeting fantasy of those who seek death. The violence of the

(Excerpt)

- C. Motion to set aside. based upon: A motion to set aside may be brought to set aside a judgment
- 1.Lack of jurisdiction over the person or the subject matter;
- 2. Fraud, accident, or mistake or the acts of the adverse party unmixed with the negligence or fault of the movant;
- 3. A non-amendable defect which appears upon the face of the record or pleadings. Under this paragraph, it is not sufficient that the complaint or other pleading fails to state a claim upon which relief can be granted, but the pleadings must affirmatively show no claim in fact existed.
- H.provided, however, that any ruling by the Supreme Court or the Court of Appeals in a case shall be binding in all subsequent proceedings in that case in the lower court. Despite the number of years, the matters of instant case judgment are still not resolved. The decision of instant case was a judge's order instead of requested and Constitutionally mandated jury trial. The fact of law is the Defendants defaulted on service and never had unanimity required for removal and the Federal Courts erred in their ruling affirming breach of contract to rule per case MALONE et al v. FEDERAL HOME LOAN MORTGAGE CORPORATION, No. 1:2014cv00193 (M.D. Ga. 2016) Mortgagees had no standing in court until cured breach. Per H. Ruling Supreme Court U.S. ruling

Jesinoski v. Countrywide Home Loans, Inc., 574 U.S. 259 (2015) Homeowner notified Mortgagees within three months of new mortgage of their USCA11 affirmed breach of contract with evidence and copies of their own employees and closing attorneys affirming the breach asking to cure or Homeowner was rescinding the contract. The Mortgagees committed fraud on courts and contempt to federal courts jurisdiction to get the rulings instant case and the Federal courts refused to intervene "federal courts do not interfere with state orders" so all instant case has the responsibility for a jury trial correct all the nullity state orders subsequent to instant case that had the binding the TPO that legally prohibited all the subsequent illegal and contemptuous acts by Mortgagees. IN CONCLUSION Instant case is not resolved as Homeowner has case 18cv4742 accepted by Supreme Court of Georgia that was transferred to Appeals Court A25A0197 and Homeowner still has \$1,000s of belongings and utilities in his name with lis pendens on his home and a transcript is forthcoming proving all courts federal and state have made rulings supporting the Homeowner's original instant case. A jury will easily rule that only by Mortgagees fraud on courts and contempt of court order have they prevailed to date over 100% legally, ethically and factually right Homeowner per original TPO granted instant case.

EXHIBIT 5

Mandated Joinder party Rocket Mortgage and CEO Krishna Defendants

Mandated Joinder Party CEO Varun Krishna and Rocket Companies, Inc. 1050 Woodward Avenue, Detroit, MI 48226-1906

The Honorable Gail Slater Assistant Attorney General Antitrust Division Dept. Justice 950 Pennsylvania Avenue NW Washington, DC 20530

The Honorable Andrew N. Ferguson Chair Federal Trade Commission 600 Pennsylvania Avenue NW Washington, DC 20580

11 July 2025

RE: Settlement Required Before Purchase of Mr. Cooper

Mr. Varun Krishna,

Congratulations on astute, savvy business strategies that if properly conducted and implemented will benefit everyone, especially homeowners. Regrettably I am informing you of ongoing illegal acts of Mr. Jay Bray CEO of Mr. Cooper (FKA: Nationstar) creating a Dr. Seuss "Cat in the Hat" legal mess that will destroy purchase of Mr. Cooper is you do not intervene and prove you are worthy to lead such a huge company. You will prove yourself and Rocket Mortgage to be innocent of any wrongdoings by immediately settling the two ongoing lawsuits in Georgia and Texas. The fraud on courts will not prevail and I will post all truth on www.RocketMortgageCorrupt.com.

See: https://www.dropbox.com/scl/fi/auo8vocyig0thllq75oju/Amended-Appellant-s-Brief-Emergency-Injunction-End-Illegal-Eviction-Supreme-Court-S24A1170-from-18cv4742-15G24-copy.pdf?dl=0

Deterrent terms will be sealed but will include Mr Bray cannot manage Rocket Mortgage department for three years and there will be an independent accountability board for any

consumer complaints and CFPB approves board.

Attached filing makes you and Rocket mandated Joinder Party Defendants due to Mr. Cooper continued practice of lies to public and defrauding courts; now apparently defrauding you. See YouTube links in fillings and all the illegal acts in Appellants Brief in Supreme Court of Georgia and in District Court North Texas: www.MrCooperCorrupt.com!!!

https://youtu.be/P2G36v7qqHc?si=h1ks72x2Ht6ibQiH

This matter is a carry over over the mortgage industry caused greatest economic recession in history: The Great Recession per movie The Big Short. You need to settle and prove you can administrate properly and not create another Great Recession due to illegal acts and abuse homeowners in greed. Everything you espouse in YouTubes to be trusted partners with home buyers to live the American Dream of homeownership is supported by Supreme Count of US ruled upholding Constitutional right, so now prove your talk! It seems Mr. Bray has lied to you as he did to newspapers and courts by withholding truth of his abuse of me that violates everything you espouse! His attorneys admitted in hearing their fraud on court was "strategizing with our clients." They have corrupted the trial judge who is being investigated by JQC - I am person behind two judges being removed and the entire JQC reformed by voters since it became an enabler instead of accountability - denying orders to access the original transcript and Zoom recordings! I twice sent registered mail to Mr. Bray alerting him to the illegal abuse being perpetrated against me naively thinking as CEO of a huge company he was not aware. Surely a man who professes to be a Christian on his company website would not knowingly steal a minister's home with hard earned equity for his retirement money when he never missed a payment! Employees and USCA11 ruled mortgagee breached the contract. It's not your fault the previous mortgage company violated congressional laws selling a breached contract. It is not your fault Mr. Bray has lied to you. What is prison worthy is the subsequent greedy abuse worse than what was done to others that caused to be on three years probation and then violating probation and defrauding courts. Bray has freaking violated a three year probation and illegally made me homeless. Deutsche is behind it all per CIP. Now is your chance to make things right because if you do not act per law and ethics and all you espouse in YouTubes you cannot be allowed to purchase Mr. Cooper. Prove you were not deceived by CEO Bray by settling with me and not allowing Mr Bray to be over Rocket Mortgage until he completes three years probation since he violated last probation imposed by all fifty states Attorneys General and CFPB. The Rocket Mortgage purchase looks good for everyone but only if Rocket is ethical and truly cares for homeowners! Otherwise it is letting a fox guard the chicken coup! How you respond and how quickly will prove who you and Rocket Mortgage are and if worthy to purchase Mr. Cooper.

Hopefully, you will fix the corruption and the Rocket buyout will go through for everyone's best interests with an accountability board that is independent and members approved by CFPB as ethical experts. I expect this to be settled before end of July. Thank you and God bless you!

Sincerely,

Rev. Christopher M. Hunt Sr, Ph.D. Still: 1920 Anastasia Lane 30341-1782 Phone: 770-457-3300 1cor13cmh@gmail.co

EXHIBIT 6 ACCEPTED S24A1170 with Leave of Court S24A0012 transferred Case No. S24A1170

IN THE SUPREME COURT OF GEORGIA

STATE OF GEORGIA

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

AMENDED APPELLANT'S BRIEF

COURT OF APPEALS CLERICAL ERROR NEVER ADDRESSED CASE

O.C.G.A § 9-11-60(a) (d)(1) (2) (3)(f)(g)(h)

EMERGENCY INJUNCTION AGAINST EVICTION WITH HEARING

REQUESTING LEAVE TO FILE THE DOCUMENT PAGE 53-55

Appellant:
Rev. Christopher M. Hunt, Sr. Ph.D. Pro Se
5456 Peachtree Blvd. Ste. 410
Atlanta, GA 30341-2235 770-457-3300
1cor13cmh@gmail.com
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QUESTIONS FOR CERTIORARI

QUESTION 1: Does the jurisdiction of an appeal to Supreme Court of United States commence instantaneously upon file stamped by court's clerk or per erroneous trial court order only after a case number issued? When does the jurisdiction of the Supreme Court of United States - and any court including this honorable Court, officially commence – at clerk file docketing or case number assignment?

- A) Is a trial court's loss of jurisdiction commenced at timely filed "Notice of Appeal" restored before a final non-appealable order from the appellant courts?
- B) How does Court intervene when trial court knew by preemptive filing with exhibits of docketed filings the case's jurisdiction was seamlessly in the Supreme Court of U.S. from Supreme Court of Georgia, but trial court signed an illegal order violating court authorities because Mortgagees want to irreparably damage the legally correct homeowner by eviction so he cannot prevail?

QUESTION 2: Did the trial court err by allowing a still ongoing, incomplete illegal and nullity eviction to continue instead of upholding Supreme Court of U.S. jurisdiction by granting TPO/Injunction?

QUESTION 3: Does the complained primordial basis for a case of jurisdiction and plaintiffs' standing preempt the supersedeas bond and preserve the right of appeal and stay the supersedeas until the primordial legal matters are resolved because if no jurisdiction and no standing would mean the supersedeas would be a nullity therefore moot?

QUESTION 4: Does the Supreme Court of Georgia have the legal mandate to intervene and uphold Supreme Court of U.S. jurisdiction and impart Spirit and intent of law, Federal Court jurisdiction, court authorities, Georgia Constitution, etc. into a defrauded superior court that has no jurisdiction and is issuing orders that are illegal, contemptuous, nullity, etc. even when Appellant is forced pro se and not articulate in legalese but adequately communicates the issues and laws to show Appellant's position is constitutionally and legally correct?

QUESTION 5: Does the Supreme Court agree that a superior court justice is mandated to uphold Rule 3.3 Candor to the Tribunal when an attorney refuses despite overwhelming evidence of violations/fraud?

STATEMENT OF JURISDICTION

Jurisdiction pursuant to Art. VI, Sec. VI, Par. V par. III (1) of the Georgia

Constitution of 1983 Exhibit 1 Order being appealed. [Cit.]" Anthony v. Anthony, 120 Ga. App. 261, 264 (2) (170 S.E.2d 273) (1969). There remains the question of state jurisdiction per O.C.G.A § 9-11-60(a) (d)(1) (2) (3)(f)(g)(h) did the state ever have jurisdiction or did fraud on courts cause nullity, illegal orders?

INTRODUCTION

COMES NOW Appellant "Homeowner" pro se due to damages from temporary theft of home and \$500,000+ equity and files APPELLANT'S BRIEF INVOKING RULE 3.3 CANDOR TO TRIBUNAL PER O.C.G.A § 9-11-60 (a) WITH EMERGENCY INJUNCTION AGAINST EVICTION AND HEARING FOR ATTORNEY GENERAL CARR'S TESTIMONY per wisest judge Solomon's Dividing Baby Case and Wisdom "she" AKA Lady Justice in today's Proverbs 20:8 "A judge who sits on the bench of judgment removes all evil with se's (he/she) eyes" and avers:

Homeowner has completed the time-consuming technicalities of Table of Contents despite hardships of current circumstances reminding Court he is delayed by mail and having to drive across town to pick up mail and then mail in filings or deliver in person. Homeowner has no transcript or records due entire office files and belongings in bags in storage or in dump due to criminal acts by the eviction crews (affidavits of witnesses forthcoming for Appellant's Reply Brief if required) and paid transcript not yet available!

Court is very aware the Appellant ("Homeowner") has been forced to legally play the carnival game Whack-A-Mole due to the Appellees' ("Mortgagees") numerous illegal, contemptuous acts and the sworn Officers of the Court enabling illegal acts via court dishonoring fraud on the courts (sorry if a pro se writing this offends the Court about Officers of the Court, but they can clear themselves of wrongdoing via Appellee Brief per invoked Rule 3.3 Exhibit 7 or get clients to settle!). Court must watch famous movie "The Big Short" to understand instant case as the Homeowner's USCA11 ruled breached loan was fraudulently placed among defaulted loans in tranches in violation to congressional laws Sarbenes-Oxley per filings (Exhibit 6) Homeowner is inadvertently become a whistle-blower who is supposed to be protected instead of abused worse, has uncovered the largest mortgage in history of U.S. fighting to save his home from proven white-collar criminal "Mortgagees" Deutsche and Nationstar/Mr. Cooper (had to change name due to losing so many cases as even headquarters newspaper article (Exhibit 6B) rebuked they had to change more than name). The DeKalb County courts started properly granting TPO and trial court second TPO after reversing an ongoing illegal attempted eviction because Homeowner showed a defrauded Magistrate judge's order to evict contradicted the very order referred to by date of DCNG! Regrettably, it appears that as Balch has two senior partners in prison for corrupting government officials, the trial court has been compromised by at least fraud as acting similar to

Fulton County judge Ural Glanville and judge Christina Peterson: refusing three motions to recuse, violated state constitution inviolable right for jury trial, denied discovery and interrogatories, denied Quash hearing, granted an illegal supersedeas that required five redrafts due Homeowner's Objections and then backdated almost 30 days so known impossible to timely pay, etc. To date Court has refused to intervene no matter how egregious the illegal acts detailed in numerous appeals Homeowner has filed seeking help for himself and thousands of homeowners. Hopefully instant case Court will intervene due to severity of egregious acts and now fully exposed case history and other courts proven supporting Homeowner's original complaint so O.C.G.A § 9-11-60(a) (d)(1) (2) (3)(f)(g)(h).

Instant case as a subpart is proving validity of certiorari currently before Supreme Court of United States concerning constitutionality of a supersedeas wherein a lone judge has the sole, unappealable authority to de facto decide a case and cover-up all errors. This created a national conflict because even NEW YORK vs DONALD J. TRUMP had a review of a proven misused for lawfare, improper supersedeas, and review resulted in a modification so justice and truth could prevail instead of the supersedeas itself being a de facto final judgment that is unconstitutionally no appeal nor review.

Given case history of Mortgagees' illegal and contemptuous acts Homeowner preemptively filed into trial court the status of case Exhibit Exhibits 2 A, B, C

showing jurisdiction seamlessly from Court (Exhibit 2B) into accepted in Supreme Court of United States (Exhibit 2C). NOTE: Homeowner is why JQC was reformed by voters, but JQC is failing! JQC was shown trial court even violated boiler plate reply of only gets involved if judge violates state constitution. Failing JQC is why Court recently disciplined bad Georgia justices due assaulting police and jailing good attorney! It required 20+ attorneys to save good attorney from jail while Homeowner is pro se – instant case is about law. Homeowner is person behind two DeKalb justices being removed and JQC reformed while trying to prevent forewarned child abuse but due to court corruption he was prevented! Now children are healing but Homeowner is fighting to save his home, but he still gets unconstitutionally abused homeless!!!!

There is a very clear and simple solution to finally avail justice and get closure on instant case and all related cases: excerpt from 13 February 24 filing page 2:

Brooke Graham and Gregory Wallach do not go lying to Marshals (NOTE: last time Mortgagees misused marshals of magistrate courts after illegal ex parte hearing frauded the justice, but this time misused sheriffs of superior court) to trick them again to enable your clients' felony crimes after violating Rule 3.3 manipulating Court to give you nullity orders. PER RULE 3.3 you are compelled give answers to question in attached Supreme Court filing Exhibit 3 to honorable Court!

...Remember I prioritize your salvation and soul eternal life to avoid hell over my house, but I am believing God will not let you steal my home! Proverbs 13:5-6, "The righteous hate what is false, but the wicked make themselves a stench and bring shame on themselves. Righteousness guards the person of integrity, but wickedness overthrows the sinner".

THEREFORE, the Homeowner prays this honorary "Court of Equity" quit being a house slave enabling Mortgagee's proven illegal acts and honor federal court

and appeals court jurisdiction for illegal Supersedeas Order and recognize there was never a proper transference of authority for state jurisdiction LOCKHART V. STANCIL 258 Ga. 634 (Ga. 1988). If Supreme Court of GA fails to Reconsider, then it will still be at least six months because going to Supreme Court of U.S. The 19cv10619 is being appealed as that was a sham hearing by apparently still compromised JQC to cover for judge Asha Jackson who is as bad and worse than other previously removed by JQC corrupt justices. Judge Robins has still not ruled on Emergency Motion in 19cv10619. DeKalb is sadly still a nationally opined outhouse and not a courthouse as many attorneys refuse to practice in DeKalb ... please prove me wrong by returning to being "an unbiased of Court of equity" who adjudicates per Spirit and intent of law so order Mortgagees to finally answer all the questions in Exhibit 3 previously submitted to Court. (NOTE: Instead, justice signed illegal order denying TPO now before this honorable Court while Homeowner is daily suffering irreparable damages being homeless in a friend's basement with no office for ministries and businesses!

NUMERATION OF ERRORS PER QUESTIONS

ERROR QUESTION 1

Jurisdiction of an appeal to Supreme Court of U.S. commences instantaneously upon file stamped by court's clerk but the trial court erred in order citing only after a case number issued! This would create an arbitrary timeline and hinder justice as all kinds of clerical errors and delays could adversely effect as case. And subpart: A trial court's loss of jurisdiction commenced at timely filed "Notice of Appeal" is NOT restored before a final non-appealable order in the appellant courts absent any orders reinstating. Court, as highest authority in state entrusted to uphold the Fifth Amendment and 14th Amendment: "... nor be deprived of life, liberty, or property, without due process of law . . ." "A state is not free, however, to have no corrective process in which defendants may pursue remedies for federal

constitutional violations." Frank v. Mangum No. 775 April 12, 1915 Appeal from DCN.GA

ERROR QUESTION 2

The trial court erred by allowing a still 6/30/24 ongoing, incomplete illegal and nullity eviction to continue instead of granting mandated Injunction that upholds Supreme Court of United States Jurisdiction. Per O.C.G.A. § 9-5-1 upholding Federal Supreme Court and U.S. Constitution or Civil War anarchy ensues:

ArtI.S9.C3.3.11 Ex Post Facto Prohibition and Judicial Decisions Article I, Section 9, Clause 3: No Bill of Attainder or ex post facto Law shall be passed. In Bouie v. City of Columbia, the Supreme Court held that "an unforeseeable judicial enlargement of a criminal statute, applied retroactively, operates precisely like an ex post facto law" and "[i]f a state legislature is barred by the Ex Post Facto Clause from passing such a law, it must follow that a State Supreme Court is barred by the Due Process Clause from achieving precisely the same result by judicial construction." 378 U.S. 347, 353–354, (1964). See also Marks v. United States, 430 U.S. 188, 195–96 (1977) (applying Bouie)

"Each case must be determined on its particular allegations, and must be decided on the nature, extent, and kind of equitable relief sought and the relationship between the parties to the action." Newport Timber Corp. v. Floyd, 247 Ga. 535, 277 S.E.2d 646 (1981).

The Homeowner should be granted protection on matter of constitutionality of a nullity and illegal supersedeas until the appeal is addressed since the appeal clearly relates to Constitutional rights and federal jurisdiction! No one executes an inmate who has verified DNA proof of innocence until appeals have final, non-appealable orders. S17A0196. LATHROP et al. v. DEAL et al June 19, 2017

"The State's argument was that you can't challenge the constitutionality of a law unless the same people who passed the law give you permission," said Jim Manley, senior attorney at the Goldwater Institute's Scharf-Norton Center for Constitutional Litigation. "That would have given the Legislature a dangerous level of power. Instead, the Georgia Supreme Court applied the unique provisions of the Georgia Constitution to give citizens a way to challenge unconstitutional laws, although in this case the plaintiffs will have to re-file their case and sue officials individually in order for their claims to be heard. Today's decision means the case is still dismissed, but the Court made clear that the legal dispute is far from over."

ERROR QUESTION 3

The complained primordial basis of state jurisdiction and Plaintiffs' standing preempts the supersedeas bond so preserves the right of appeal and stays the supersedeas until the primordial legal matters are resolved because if no jurisdiction and no standing would mean the supersedeas would be a nullity and therefore moot! Therefore, Court must uphold Federal Supreme Court and Federal Constitution:

237 U.S. 309 35 S. Ct. 582 59 L. Ed. 969 LEO M. FRANK, Appt., v. C. WHEELER MANGUM, Sheriff of Fulton County, Georgia. No. 775. Decided April 19, 1915.

"...on the ground of a deprivation of Federal rights sufficient to oust the state of its jurisdiction to proceed to judgment and execution against him. This is not a mere matter of comity, as seems to be supposed. The rule stands upon a much higher plane, for it arises out of the very nature and ground of the inquiry into the proceedings of the state tribunals, and touches closely upon the relations between the state and the Federal governments. As was declared by this court in Ex parte Royall, 117 U. S. 241, 252, 29 L. ed. 868, 871, 6 Sup. Ct. Rep. 734, applying in a habeas corpus case what was said in Covell v. Heyman, 111 U. S. 176, 182, 28 L. ed. 390, 392, 4 Sup. Ct. Rep. 355, a case of conflict of jurisdiction: 'The forbearance which courts of co-ordinate jurisdiction, administered under a single system, exercise towards each other, whereby conflicts are avoided by avoiding interference with the process of each other, is a principle of comity, with perhaps no higher sanction than the utility which comes from concord; but between state courts and those of the United States, it is something more. It is a principle of right and of law, and therefore, of necessity.' And see Re Tyler, 149 U. S. 164, 186, 37 L. ed. 689,

696, 13 Sup. Ct. Rep. 785.

Trial court violated 7th Amendment and Constitution of Georgia involatile right for jury trial, refused to uphold federal court jurisdiction of Mortgagees' Removal, denied Quash hearing, denied discovery and interrogatories, refused to correct clerical error, misused the supersedeas bond as a ruse means to evict 100% legally correct Homeowner because could not win in court is proven by ongoing second illegal eviction!

Further, even if an eviction is completed over previously filed matters of jurisdiction, trial court erred by ruling moot and allowing irreparable damages to 100% legally right appellant Homeowner:

If case is moot, but error is capable of repetition, yet evades review, the appeal will be considered. Chastain v. Baker, 255 Ga. 432, 339 S.E.2d 241 (1986) and United Food & Commercial Workers Union v. Amberjack, Ltd., 253 Ga. 438, 321 S.E.2d 736 (Ga. 1984)

ERROR QUESTION 4

The Supreme Court of Georgia has legal mandate to intervene per O.C.G.A § 9-11-60(a) (d)(1) (2) (3)(f)(g)(h) and uphold Supreme Court of U.S. jurisdiction and impart Spirit and intent of law, Federal Court jurisdiction, court authorities, Georgia Constitution, etc. into a defrauded superior court that has no jurisdiction and is issuing orders that are illegal, contemptuous, nullity, etc. especially for forced pro se who is not articulate in legalese but adequately communicates the issues and laws to show Appellant is constitutionally and legally

correct! Federal Judge Posner resigned in protest "pro se (mis)treated like trash."

A court examining a pro se complaint should hold it to less stringent standards than those applied to pleadings drafted by attorneys, and should deny filing "only if 'it appears beyond doubt that the appellant can prove no set of facts in support of his claim which would entitle him to relief.' [Cits.]" Washington v. Rucker, 202 Ga. App. 888, 415 S.E.2d 919 (1992). The pleading need not set out all the issues with particularity, but only place the defendant on notice of the claim against him. Hawkins v. Rice, 203 Ga. App. 537, 417 S.E.2d 174 (1992).

ERROR QUESTION 5

The law and Court duties mandate that a superior court justice must uphold

Rule 3.3 Candor to the Tribunal if an attorney refuses to adhere despite overwhelming evidence of violations/fraud!

Atlanta September 10, 2003 The Honorable Supreme Court met pursuant to adjournment. The following order was passed: It is ordered that Part IX Professionalism of the Rules and Regulations for the Organization and Government of the State Bar of Georgia, establishing the Chief Justice's Commission on Professionalism, be amended inter alia, to provide for the addition of a state court judge to the Commission, to read as follows: Rule 9-101. Purpose.

This Article suggests that a third consideration has recently been added to the debate: that of a court's expectation of citation to adverse authority and that court's willingness to use its sanctions authority to enforce its expectation.5 Further, this added consideration may provide a basis for a change in attorney conduct; some courts are defining the scope of an attorney's duty of candor to the court more broadly than it is defined under ethical rules and are imposing sanctions on attorneys who do not comply with a court's definition of the duty of candor.

5. See infra Par II (discussing use of sanctions to punish attorneys' failure to cite adverse authority); Joanne Pitulla, Playing Ostrich: Courts Are Getting Tough with Lawyers Who Forget to Cite Adverse Authority, A.BA J., Aug. 1993, at 97 (noting increased frequency of sanctions). This Article deals only with the trend toward federal courts' use of sanctions to enforce a duty of candor. It does not examine whether state courts are similarly enforcing a duty of candor.

FACTS OF CASE AND MANDATE FOR INJUCTION

Homeowner was never late on a payment and gave mortgage company written notice in first three months of new mortgage so is protected by cited Supreme Court of Jesinoski v. Countrywide Home Loans, Inc., 574 U.S. 259 (2015).

The USCA11 ruled the mortgagees first breached contract so Homeowner is protected by cited MALONE et al v. FEDERAL HOME LOAN MORTGAGE CORPORATION, No. 1:2014cv00193 (M.D. Ga. 2016) wherein party that commits first breach has no standing to enforce any part of contract until the breach is cured.

Homeowner paid an extorted \$3,000 payment to Nationstar (when proper mortgage amount was \$1,800) to prevent wrongful foreclosure but Nationstar in greed violated RESPA violations so Homeowner protected as winning member of cited Robinson v. Nationstar Mortgage LLC, 8:14-cv-03667, (D. Maryland). Homeowner as whistleblower to largest mortgage scam in US history is protected by Congressional laws Sarbanes—Oxley. Homeowner is protected by two proven legally correct DeKalb TPOs and O.C.G.A. Now Homeowner has learned the Mortgagees were under a three year more stringent probation 2021-2024 after being fined \$90Million. By all fifty states Attorneys General and CFPB. Homeowner has shown Court(s) he has been illegally and in violation to law and probation abused worse than other homeowners and never saw any money as compensation for damages hence new lawsuit in Texas against officers of Mortgagees (Exhibit 2).

As Homeowner forewarned Court, the white-collar criminal Mortgagees are incorrigible and their bad acting debt collecting attorneys court(s) disrespecting! This emergency injunction is required because there is as of today 8 May 2024 a still uncompleted illegal, contemptuous, nullity eviction in process. Homeowner still has personally belongings in his home with utilities in his name. Mortgagees attorneys have done a repeat misusing the sheriffs this time after defrauding the County Attorney over Sheriffs just as they defrauded the DeKalb County magistrate judge by misrepresenting jurisdiction and case status to obtain a nullity illegal eviction during an illegal ex parte hearing that caused the marshals to be misused to do their dirty work attempt to felony crime steal home and \$500,000 for their client Mortgagees who are now proven to be orchestrating, per attorneys "strategizing" all these court disrespecting illegal acts! Once again, the too eagerly defrauded DeKalb court has refused to do legal duty and intervene (Exhibit 1) Order being appealed directly into Court on question of Constitution of Georgia with request for Injunction until Court hears matter or in respect to Supreme Court of U.S. certiorari.

Homeowner spent \$350 for expert former state representative attorney hour consultation, who basically opine "courts hate pro se, are overwhelmed and look for any reason to reject a case. I see your argument is very legitimate but problem case history (erroneous) orders (obtained by fraud)." Rule 60 overcomes but he would not take case so Homeowner still forced pro se must file. See Exhibit 3 Notice Filing

Motion Hearing Rule 60 Fraus Omnia Corrumpit Now this Court does have jurisdiction and being publicized nationally www.SupremeCourtofGeorgia.US and www.MrCooperCorrupt.com. Please grace me: Court is requested to prove itself to nation not to enable white-collar criminals who defraud courts because you care for homeowners and CFPB and all fifty states Attorneys General who imposed probation, and you care more for Spirit and intent of U.S. Constitution more than illegal oligarchy and rich white-collar criminals. Court has cared to overrule a conviction of a confessed criminal due to a technicality despite criminal raped a mother in front of her children and then poured boiling water on her while instant case has grossest violations and the Mortgages lied to sheriff's attorney who instructed the innocent sheriffs to enable a felony white-collar crime – and defrauded judge in erroneous order exonerates!

The matter coming this Court to uphold Supreme Court of U.S. jurisdiction is the legally mandated reversal of still ongoing eviction. Homeowner filed into case 18cv4742 so all parties knew (Exhibits 2 file stamped awaiting case #) and this honorable Court's jurisdiction Injunction to halt and reverse the uncompleted eviction is required to uphold courts' honor and jurisdiction during Certiorari (Exhibit 5). Mortgagees must respect Courts, CPFB and Attorneys General.

INVOCATION OF RULE 3.3

Instant case will be resolved by Appellees Brief adhering to Rule 3.3

Exhibit 7 when answering each question posed herein.

This appeal has given Court jurisdiction of all matters.

O.C.G.A. 9-11-60. Relief from judgments

- (a) Collateral attack. A judgment void on its face may be attacked in any court by any person. In all other instances, judgments shall be subject to attack only by a direct proceeding brought for that purpose in one of the methods prescribed in this Code section.
- (f) ... A judgment void because of lack of jurisdiction of the person or subject matter may be attacked at any time.

Instant case it has been proven and will be again by Appellees' Brief per Rule 3.3 that the state never had jurisdiction because all jurisdiction was in federal courts by Appellees' own Removals without a non-appealable final order. The Appellees never had standing due first breach of contract that was never cured. New cases support Homeowner and only fraud on courts adversely effecting machinery of justice has prevented Homeowner from rightly saving his home.

Under OCGA § 9-12-16, a judgment of a court having no jurisdiction of the person or the subject matter or which is void for any other cause is a mere nullity and may be so held in any court when it becomes material to the interest of the parties to consider it. A void judgment is one that has a defect apparent on its face. Since the trial Court ignored Homeowner's filing, THEREFORE, COURT HAS JURISDICTION INSTANT CASE OF ALL THESE MATTER \$24A1170

HEARING WITH ATTORNEY GENERAL CHRIS CARR

Homeowner requests hearing with Attorney General Chris Carr to testify and then question Mortgagees concerning their illegal acts instant case(s) and contemptuous violations to two settlement cases and probation 2021-2024 and why no compensation to Homeowner.

FACTS AND LAW WITH QUESTIONS TO BE ANSWERED PER RULE 3.3 AVAILING JUSTICE AND CLOSURE

Currently Homeowner is homeless due to illegal, contemptuous, surprise eviction that has caused irreparable damage and loss of \$50,000+/- belongings wherein Sheriffs were misused to enable theft of 100% legally correct Homeowner's home of thirty years with \$500,000 equity for retirement and children' college education and destroy Homeowner's homebased offices for ministries and businesses! Per filing:

In deciding whether to issue an interlocutory injunction, the trial court should consider whether: (1) there is a substantial threat that the moving party will suffer irreparable injury if the injunction is not granted; *REPLY NOTE: Senior citizen with home based ministries and business warned Court he would be destroyed and that is goal of Mortgagees to unethically and illegally destroy Homeowner since cannot win in court - resort to illegal ex parte hearings and fraud! (2) the threatened injury to the moving party outweighs the threatened harm that the injunction may do to the party being enjoined; *REPLY NOTE: there is no harm and only benefit to enjoined party because home is very well cared for by person who built it and wants to live in it and is only appreciating and the forthcoming ruling by Supreme Court US and Texas will help Mortgagees repair horrible reputation if the Texas and Supreme Court rulings are to their favor (3) there is a substantial likelihood that the moving party will prevail on the merits of his claims at trial; *REPLY NOTE: Homeowner will absolutely prevail in Texas and if Supreme Court may accept the certiorari this time because of national conflict of lone judges imposing supersedeas bonds can be defrauded and if no appeal or review possible as in Georgia then it is a travesty of injustice. and (4) granting the interlocutory injunction will not disserve (sic disservice) the public interest. *REPLY NOTE: per all fifty states attorneys general and federal Consumer Financial Protection Bureau CFPB this injunction is definitely for public's best interests! SRB Inv. Servs., LLLP v. Branch Banking & Tr. Co., 289 Ga. 1, 709 S.E.2d 267 (2011).

Instant case proves the purpose to get Homeowner out of his home was then to attempt to Moot all the illegal acts preceding to still ongoing eviction, not

completed eviction as of 7/15/24. Despite Court delay in granting the requested TPO so senior citizen Homeowner is barely surviving daily by grace of God and yeoman's efforts, the eviction is still reversible as \$1,000s of belongings in home, utilities on in Homeowner's name and Homeowner in faith believing for justice of reversible error is cutting grass and trimming bushes, maintaining home. The white-collar criminal Mortgagees and their bad acting debt collecting attorneys care nothing for people but in their drug of choice greed cash – just as drug addicts burglarize homes to get a fix, Mortgagees have defrauded and dishonored courts to steal an entire home with \$500,000 equity. At least burglars do not make victims homeless! Court has an easy decision – rule per Spirit and intent of law on behalf of a pro se litigant and help 100,000s of homeowners, or, in legal nepotism for legal oligarchy enable felony white collar crimes that only recently additionally were discovered to be a violation of three year probation 2021-2024 and two court final orders in settling cases that had almost \$200,000,000.00 in fines and restitution to Homeowners - Homeowner has not received any compensation but only worse and more abuse than what Mortgagees did to be fined. Homeowner is whistle blower to largest Mortgage scam!

APPELLLEE BRIEF MUST ANSWER PER RULE 3.3 & Exhibit 9

Exhibit 9 all questions pages 44-53 must be answered. No court has yet addressed due fraud on the courts. Now per O.C.G.A. §9-11-60 answer.

These are not all the issues but enough to mandate an Injunction and grant

hearing with Chris Carr per Rule NiSi.

IN CONCLUSION law mandates Injunction reversing eviction per excerpt Exhibit 5 showing Mortgagees' own filings support Homeowner!

THEREFORE Homeowner prayerfully requests honorable Court:

- 1. Grant the injunction against ongoing eviction and allow Homeowner back into his home until there is a final non-appealable order from Supreme Court U.S. and Texas cases.
- 2. Order Mortgagees answer all questions Exhibit 9 per Rule 3.3.
- 3. Grant hearing for Attorney General of Georgia Chris Carr to testify and be questioned (via remote video if necessary).
- 4. Allow Homeowner to amend this filing and any other requests Court may require to facilitate justice for Georgia citizens including page and word count as not sure how to count.

Any and all other relief and benefit allowed by law and per Court's discretion. This 15^{th} Day of July 2024,

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

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

5456 Peachtree Blvd. 410

Chamblee, GA 30341-2235 770-457-3300 1cor13cmh@gmail.com

CERTIFICATE OF COMPLIANCE

Century School Book Font 14 Word Count: 4,835

IN THE SUPREME COURT OF GEORGIA STATE OF GEORGIA

DEUTSCHE BANK TRUST CO.	§	
AMERICAS, AS TRUSTEE	§	SUPREME COURT
MR. COOPER/NATIONSTAR	§	CASE:
	§	S24A1170
Plaintiff/Appellee	§	
	§	
V.	§	
	§	
CHRISTOPHER M. HUNT, Sr.	§	
	§	DeKalb Case:
Defendant/Appellant	§	18CV4742-2
	§	

CERTIFICATE OF SERVICE

I have sent a copy of this petitioner's APPELLANT'S BRIEF INVOKING RULE 3.3 CANDOR TO TRIBUNAL PER O.C.G.A § 9-11-60 (a) WITH EMERGENCY INJUNCTION AGAINST EVICTION AND HEARING FOR ATTORNEY GENERAL CARR'S TESTIMONY via email court system to suffice for service Rule 6 this 15th July 2024 and again. 8 July 2025

Dallas Ivey

Aldridge, Pite, LLP

Fifteen Piedmont Court 3

575 Piedmont Road NE Suite 500 Atlanta, GA 30305

Brooke Gram bgram@balch.com ?St.? Patrick Silloway@balch.com Balch and Bingham LLP 30 Ivan Allen Jr. Blvd. NW Suite 700 Atlanta, GA 30308

//Christopher M. Hunt, Sr.// (electronic signature) Christopher M. Hunt, Sr. Pro Se 5456 Peachtree Blvd. #410 Chamblee Georgia, 30341-2235 1cor13cmh@gmail.com (770) 457-3300

cc: Attorney General Chris Carr and CFPB (Consumer Financial Protection Bureau due violations of 2 year probation, JQC, JAY Bray CEO of Mr. Pooper Cooper fka: Nationstar so he can act as righteous as he claimed in newspaper article

Exhibit 1A ERRONEOUS ORDER BEING APPEALED DENYING TPO

FILED 04/29/2024 9:00:53 AM Clerk of Superior Court DeKalb County

IN THE SUPERIOR COURT OF DEKALB COUNTY STATE OF GEORGIA

DEUTSCHE BANK TRUST COMPANY)	
AMERICAS, AS TRUSTEE,)	
)	
)	CIVIL ACTION FILE NO.
vs.)	
)	18CV4742-2
CHRISTOPHER HUNT.)	

ORDER DENYING DEFENDANT'S PENDING MOTIONS

The Court has reviewed the various motions filed by Defendant since the entry of its last order. The Court notes, Defendant's challenges in both state and federal court as well as his attempts to obtain a stay or reversal of the Writ of Possession have been unsuccessful. As best the Court can tell, Defendant now seeks an injunction, asks this Court to "void, pause, reverse, prohibit" his eviction, and claims he has a United States Supreme Court case and a Texas class action suit that are grounds for the Court to grant his requested relief.

Pursuant to Defendant's request for an injunction, the Court has considered whether: (1) there is a substantial threat that the moving party will suffer irreparable injury if the injunction is not granted; (2) the threatened injury to the moving party outweighs the threatened harm that the injunction may do to the party being enjoined; (3) there is a substantial likelihood that the moving party will prevail on the merits of his claims at trial; and (4) granting the interlocutory injunction will not disserve the public interest. SRB Inv. Servs., LLLP v. Branch Banking & Tr. Co., 289 Ga. 1, 709 S.E.2d 267 (2011).

1

Not only does Defendant not meet the prerequisites for a preliminary injunction,

the relief he requests is now moot. Per Defendant's pleadings, the eviction already has

occurred. "The sole purpose for granting interlocutory injunctions is to preserve the

status quo of the parties pending a final adjudication of the case." Poe & Brown of Georgia,

Inc. v. Gill, 268 Ga. 749, 750, 492 S.E.2d 864, 865 (1997). "It is a rather fundamental rule

of both equitable jurisprudence and appellate procedure, that if the thing sought to be

enjoined in fact takes place, the grant or denial of the injunction becomes moot." Fincher

v. Fleet Mortg. Grp., Inc., 251 Ga. App. 757, 758, 555 S.E.2d 120, 121 (2001).

Upon search of the United States Supreme Court docket, there are no

active/pending matters involving Defendant. The writ of possession in this case is still

valid and enforceable and is now the law of the case and judgments and orders shall not

be set aside or modified without just cause. O.C.G.A. § 9-11-60(h). Defendant has failed

to show just cause or point to any authority under law authorizing this Court to stay

eviction based on the valid Writ of Possession. Thus, Defendant's requests for relief are

DENIED.

IT IS SO ORDERED this 26th day of April, 2024.

HON. ASHA F. JACKSON

Pha I lackoon

DeKalb County Superior Court Judge

Division 2

2

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EXHIBIT 1B APPEALS COURT BEING APPEALED DUE TO CLERICAL

ERROR: Trial Court case clearly 18cv4742 Error Case #19cv4742 !!!

There is a pending Motion to Reopen Case as head clerk has admitted error but sadly justices not trusted as may be waiting for no ailing then toss entire case!!!

Court of Appeals of the State of Georgia

ATLANTA, June 23, 2025

The Court of Appeals hereby passes the following order

A25A0197. CHRISTOPHER HUNT v. DEUTSCHE BANK TRUST COMPANY et al .

Upon consideration of the APPELLANT'S Motion for Reconsideration in the above styled case, it is ordered that the motion is hereby DENIED.



Court of Appeals of the State of Georgia Clerk's Office, Atlanta, June 23, 2025.

I certify that the above is a true extract from the minutes of the Court of Appeals of Georgia.

Witness my signature and the seal of said court hereto affixed the day and year last above written.

Christina Coley Anish, Clerk.

EXHIBIT 1C

Court of Appeals of the State of Georgia

ATLANTA, June 23, 2025

The Court of Appeals hereby passes the following order

A25A0197. CHRISTOPHER HUNT v. DEUTSCHE BANK TRUST COMPANY et al.

Upon consideration of the APPELLANT'S motion FOR PERMISSION TO FILE A SECOND MOTION FOR RECONSIDERATION in the above styled case, it is ordered that the motion is hereby DENIED.



Court of Appeals of the State of Georgia Clerk's Office, Atlanta, June 23, 2025.

I certify that the above is a true extract from the minutes of the Court of Appeals of Georgia.

Witness my signature and the seal of said court hereto affixed the day and year last above written.

Christina asley Anich, Clerk.

Exhibit 2 PROOF COURT AND OPPOSING COUNSEL KNEW JURISDICTION

FILED 4/9/2024 2:08 PM CLERK OF SUPERIOR COURT DEKALB COUNTY GEORGIA

IN THE SUPERIOR COURT STATE OF GEORGIA

§	
8	CIVIL ACTION
8	FILE NO.: 18CV4742
§	
8	Magistrate Case
§	17D25385
§	
§	RE: S24C0012 & S24A0235

NOTICE JURISDICTION SUPREME COURT US WITH CONTINUED MOTION FOR HEARING RULE 60 WHEN JURISDICTION RETURNS

COMES NOW Defendant ("Homeowner") forced pro se due temporary theft of Home with \$500,000+ equity and files this NOTICE JURISDICTION SUPREME COURT US WITH CONTINUED MOTION FOR HEARING RULE 60 WHEN JURISDICTION RETURNS per error in order 'just Bible verses' but Spirit and intent of U.S. law Lady Justice aka Wisdom of Georgia mottos "she" in historical writings of wisest judge "dividing baby case" Solomon Proverbs 21:1, 3, 21 "Getting treasures by a lying tongue is the fleeting fantasy of those who seek death. Whoever adjudicates by righteousness and mercy finds life, righteousness, and honor." "Objective Court of Equity" properly reversed the surprise no service in-progress eviction because illegal, contemptuous, no jurisdiction, obtained via fraud per soon completed transcript and avers:

JURISDICTION ALL MATTERS IN SUPREME COURT U.S.

Per Exhibit 1 jurisdiction all matters are appealed into Supreme Court of U.S: mandate, violation of Georgia Constitution jury trial, illegal supersedeas, uncorrected clerical error, etc. Notice unconstitutional supersedeas misuse against presidential candidate billionaire Trump proves supersedeas are now being misused in unethical lawfare. Any and all other relief and benefit per Court's discretion for Homeowner. This filing is everyone no doubt knows jurisdiction. Prayerfully and Respectfully and Submitted this 9th March 2024.

//Christopher M. Hunt, Sr.// Electronic Signature
Christopher M. Hunt, Pro Se
5456 Peachtree Blvd. #410
Atlanta GA 30341-2235
lcor13cmh@gmail.com 770-457-3300

EXHIBIT 2B Submitted to Court and Mortgagees EXHIBIT 1

Robert Meek, Clerk Emergency Application Writ for Injunction Supreme Court of the United States 1 First Street, NE Washington, DC 20543

RE: CERTIORARI

20 March, 2024

Robert,

Enclosed is a filing from the Supreme Court of Georgia that shows the impossible to resolve conflict of federal and state courts and new misuse of Supersedeas Bond as is being done in New York v. Trump for defrauded/corrupted judges to prevent appeals as means to thwart truth and justice from prevailing. It will also address the courts bias and prejudice against pro se as honorable Judge Posner resigned in protest due "pro se treated like trash" to extent courts are disregarding <code>Jesinoski</code>, etc. There needs to be a way to address rights of pro se as Court overturned past Dred Scott, etc.

See website www.SupremeCourtOfGeorgia.US

Please return a file stamped copy in enclosed SASE with case number so I am protected while courts sort all these constitutional matters out.

Sincerely

Christopher M. Hunt, Sr. Applicant forced against desires Pro Se

4556 Peachtree Blvd 410 Atlanta, GA 30341-2235

770-457-3300

1cor13cmh@gmail.com



EXHIBIT 2C

IN THE SUPREME COURT OF GEORGIA STATE OF GEORGIA

DEUTSCHE BANK TRUST COMPANY §
AMERICAS, AS TRUSTEE §

Plaintiff/Appellee

CHRISTOPHER M. HUNT, Sr.

Defendant/Appellant

SUPREME COURT CASE: S24C0012

Previously Transferred: S23D0960

Georgia Court Appeals: A23D0373

DeKalb Case: (Cross Filed) 18CV4742-2

NOTICE OF APPEAL TO SUPREME COURT OF U.S. CERTIORARI

PETITIONER
Rev. Christopher M. Hunt, Sr. Ph.D.
Appellant, Pro Se
5456 Peachtree Blvd. Ste. 410
Atlanta, GA 30341-2235
770-457-3300
1cor13cmh@gmail.com

RECEIVED BY MAIL

SUPREME COURT OF GEORGIA

EXHIBIT 3

FILED 3/22/2024 5:43 PM CLERK OF SUPERIOR COURT DEKALB COUNTY GEORGIA

IN THE SUPERIOR COURT STATE OF GEORGIA

NATIONSTAR MORTGAGE, LLC and	8	
DEUTSCHE BANK TRUST COMPANY	8	
AMERICAS, AS TRUSTEE,	8	
Et. Al.	8	
	8	CIVIL ACTION
Petitioners	8	FILE NO.: 19CV10619
	8	
-versus-	8	Cross filed from 18cv4742
	8	
CHRISTOPHER M. HUNT, Sr	8	RE: 20cv3778
	8	
Respondent	8	

NOTICE OF FILING WITH MOTION FOR HEARING PER RULE 60 AND FRAUS OMNIA CORRUMPIT

COMES NOW Respondent ("Homeowner") pro se due to damages sustained by Petitioner's Et Al ("Mortgagees"). Homeowner files this **NOTICE OF FILING WITH MOTION FOR HEARING PER RULE 60 AND FRAUS OMNIA CORRUMPIT** and avers per Spirit of U.S. law, wisest judge to ever live in Wisdom "she" in Proverbs 16:10-12 A divine verdict is on the lips of a Judge; Judge's mouth must not betray justice. Honest scales and balances are from the LORD; all the weights in the bag are His concern. Wicked behavior is detestable to judges, for a bench is established through righteousness...."

Please Court remember Homeowner's heart and intent is appreciation for properly granted TRO! Homeowner is protecting this honorable Court of equity from being corrupted per erroneous Bill of Peace, he is not attacking this honorable Court any more than a doctor cutting out a cancerous tumor from a patient. Cause is bad acting officers of Court debt collectors who are being a cancer to the Court. Case under appeal so this supplements the record and if appeal denied mandates hearing per Rule 60 wherein Homeowner will have counsel who will prevail per Exhibit 1 filing (Exhibit 2). Submitted this 22nd March 2024.

//Christopher M. Hunt, Sr.// Electronic Signature
Christopher M. Hunt, Pro Se
5456 Peachtree Blvd. #410
Atlanta GA 30341-2235 1cor13cmh@gmail.com 770-457-3300

EXHBIT 4

FILED 4/24/2024 12:21 PM CLERK OF SUPERIOR COURT DEKALB COUNTY GEORGIA

IN THE SUPERIOR COURT STATE OF GEORGIA

DEUTSCHE BANK TRUST COMPANY	§	
AMERICAS, AS TRUSTEE	§	
Plaintiff/Appellee	§	CIVIL ACTION
	§	FILE NO.: 18CV4742
	§	
-versus-	§	Magistrate Case
	§	17D25385
CHRISTOPHER M. HUNT, Sr	§	
Defendants/Appellant	§	RE: S24C0012

REPLY INVOKING O.C.G.A. § 9-11-60 TO RESPONSE OPPOSING DEFENDANT'S MOTIONS SEEKING INJUNCTIVE RELIEF

COMES NOW Defendant Pro Se "Homeowner" being illegally evicted after temporary theft of home with \$500,000+ equity and files this AMENDED ALL-IMPORTANT EXHIBITS TEXAS LAWSUIT FOR EMERGENCY MOTION FOR STAY/INJUNCTION DURING APPEAL OF BILL OF PEACE 19CV10619 AND EMERGENCY MOTION FOR TPO AGAINST FRAUDULENTLY OBTAINED ILLEGAL NULLITY EVICTION and avers:

REPLY: STATUS IS EVICTION IS ONGOING AND CAN BE REVERSED

Homeowner was never late on a payment and paid extorted \$3,000 for \$1,800 mortgage but Nationstar (AKA Mr.Cooper and Deutsche collectively "Mortgagees") in greed chose to steal senior citizen, minister's home with \$500,000 equity for his retirement and children college eduction instead of cure the USCA11 ruled breach of contract so Homeowner is winning member of ROBINSON for class action RESPA violation done by Mortgagees that created entire ten years legal battle that has been proven prolonged by Mortgagees. Please honorable Court look at the exhibits from Texas case and you will see you have been defrauded to make erroneous orders and they again are showing incorrigible to Object - using a new attorney as two previous lead attorneys fired and the others probably dare not have name associated with

EXHIBIT 5 CERTIORARI SUPREME COURT OF U.S. (not formatted)

No.		
In The		
Supreme Court of the United States		
CHRISTOPHER M. HUNT, SR.		
Petitioner,		
V.		
DEUTSCHE BANK NATIONAL TRUST COMPANIES, et al,		
Respondents.		
On Petition For Writ Of Certiorari To The Supreme Court of Georgia		
 §		
PETITION FOR WRIT OF CERTIORARI		
 §		
Christopher M. Hunt, Sr., Pro Se		
5456 Peachtree Blvd. 410		
Chamblee, Georgia 30341-2235		
770-457-3300		
1cor13cmh@gmail.com		

QUESTIONS PRESENTED

- 1. When a state court with no jurisdiction is dealing with an uncured first breach then abuses its discretion to illegally in violation to Bill or Rights and State Constitution deny timely requested jury trial and then violate O.C.G.A. to impose an illegal supersedeas bond, that in itself is additionally delusional excessive amount as New York v. Trump that shows a national conflict, is it unconstitutional for there not to be an appeal/review mechanism within the Georgia Court system to review the judge's illegal supersedeas order to obtain justice?
- 2. When there is admitted by courts conflict between the federal courts and state courts on such all-important matters such as jurisdiction per Petitioner's DeKalb GA 18CV4742 and Supreme Court of Georgia S24C0012, and the Federal Courts have refused to uphold its jurisdiction "do not disturb state orders", how can the conflict of jurisdiction be resolved if state refuses to address its own nullity, contemptuous orders

per Yellow Freight System, Incorporated v. Donnelly, (1990) and ROBB v. CONNOLLY (1884) to close the loophole of conflicting oppositional jurisdiction?

- 3. When there is proven First Breach, do the appeal courts have to proactively consider as the number one priority over all others the First Breach because uncured First Breach makes Supersedeas and all other matters moot per PAUL E. MALONE, SR. & FAITH LANIER MALONE, Plaintiffs, v. FEDERAL HOME LOAN MORTGAGE CORPORATION and BANK OF AMERICA, N.A., Defendants. Case No. 1:14-cv-193 (WLS) United States District Court, M.D. Georgia, Albany Division. May 12, 2016. "cannot enforce any part of contract until cure first breach"?
- 4. Did the Supreme Court of Georgia err by not honoring request to explain its position if chose to deny a certiorari that was asking court to review the constitutionality of state law that there is no appeal or review of a supersedeas so empowers a lone county judge to rule contrary to Bill of Rights and Georgia right to jury trial, Supreme Court of U.S. JESINOSKI, USCA4 JOHNSON (homeowner class action winning member), USCA11 ruled Mortgagees first-beached contract, DCN.GA MALONE, O.C.G.A. §, etc. ?

INTRODUCTION

This is the state courts of previous federal courts cases. New York v. Trump is proving the national conflict and unconstitutional "Lawfare" misuse of illegal supersedeas bonds required to get justice for an appeal! Supersedeas Order was meant to prevent misuse of judicial system through appeals that burden courts, but now the pendulum has swung to the opposite extreme where wealthy corporations with powerful multistate law firm debt collectors defraud/corrupt judges to misuse supersedeas to prevent truth and justice from prevailing on appeal. This misuse of supersedeas not only violates Constitutional rights and defrauds the judicial system of appeal rights to uphold Spirit and intent of law.

Regrettably, Homeowner had to deal with getting JQC to remove corrupt two DeKalb judges for ordering their court reporters to illegally alter transcript to prevent appeals. Instant appeal deals with a judge violating state constitutional right for jury trial, refusal to correct clerical error, refuse quash hearing, etc. It is unconstitutional for a lone judge to have absolute power of no appeal or review. Petitioner "Homeowner" has suggested to Supreme Court of Georgia that there be a panel of three independent of courts forensic experts that are paid for by the appealing party to review a judge's supersedeas order on basis of law and values to avail justice for appellants and prevent abuse. This upholds intent of supersedeas to prevent burdening courts of frivolous bad faith appeals while protecting Constitutional right for legitimate appeals. New York v. Trump allowed an appeal review but Georgia has no such appeal of review and Supreme Court refused the request if deny the certiorari to legally explain its denial despite Homeowner citing a

case wherein an admitted and convicted prisoner who had raped and brutally burned a mother in front of children had conviction overturned with lengthy legal description of why a technicality should prevail. Instant case a 100% legally correct senior citizen was never late on a payment!

Homeowner is a stellar senior citizen (www.MLKStoneMountin.com) with Ph.D. in Theology and MA in counseling. He built his home in subdivision he developed and named after his daughter and enjoyed raising his children with home-based business for twenty years. Home has \$500,000+ equity Homeowner cannot access to pay for counsel and cannot refinance to pay illegal supersedeas due to court actions. Equity was being saved for three kids' college and Homeowner's retirement. The Homeowner had excellent credit and timely paid his mortgage until, as the 11th Circuit Court ruled, the first mortgagee breached their mortgage contract. Instant case is a carry-over from past years of mortgage industry corruption that caused the Great Recession. (end copy)

EXHIBIT 6

FILED 4/21/2024 9:07 PM CLERK OF SUPERIOR COURT DEKALB COUNTY GEORGIA New Evidence Amended Emergency Motion Stay and TPO FILED 21D24

Here are the facts to grant a third TPO after being defrauded to void second TPO and Mortgagees violated Rule 28 § 1450 ignoring first TPO - then hypocritically misused the very rule they violated against Homeowner to defraud federal courts so they could not interfere with their illegally obtained state orders against Homeowner to accomplish their scheme to destroy Homeowner via illegal eviction because unable to legally win in courts. The new evidence and legal reasons for TPO and reversing eviction so Homeowner can live in home unmolested until justice and truth prevail:

- 1. Constitution of United States with Bill of Rights for property rights and homeownership protects Homeowner who was never late on a payment. Mortgagees have never disputed this fact of law nor can provide evidence otherwise. Homeowner even paid an extorted \$3,000 to Mortgagees when mortgage per contract was \$1,800. The Mortgagees illegally dual tracked negotiating in bad faith while simultaneously advertising foreclosure. Mortgagees made false promise and excuses as part of ruse to make Homeowner feel safe but then in less than a week before foreclosure breached verbal contracts and returned Homeowner's payment and evidence of breached mortgage contract in attempt to steal home with now \$500,000 equity. Mortgagees illegal action resulted in Federal Court ruling RESPA violations on behalf of Homeowner being winning member of ROBINSON District Court MD Greenbelt. Mortgagees have not provided any evidence they have done anything for Homeowner to right the RESPA violations against Homeowner but are only perpetuating the acts the federal government and Attorneys General stopped, fined and by order were not to be repeat offender. Therefore, Homeowner cannot lose his home due eviction.
- 2. Supreme Court of U.S. ruling in JESINOSKI that Homeowner fulfilled by writing Mortgagees within first three months of breach of contract. This eviction violates JESINOSKI with no proof of Mortgagees curing so Homeowner cannot lose home due eviction.
- 3. Constitution of Georgia assuring property rights and jury trials on cases of Mortgages and homeownership. Mortgagees caused the violation of his Constitutional right to jury trial. So Homeowner cannot lose home due eviction.
- 4. Congressional laws Sarnesby-Oxley "SOX" and Consumer Protection Acts per previous YouTube protects so Homeowner cannot lose home due eviction.
- 5. USCA11 ruled Mortgagees breached contract so Homeowner protected by District Court of Middle Georgia MALONE that states Mortgagees cannot enforce any part of contract until cures breach. Where is there any evidence from Mortgagees they cured breach to have any right to be in court? Eviction is not legally possible.

6. All fifty states Attorneys General, the Consumer Fraud Protection Bureau and Court Authorities Homeowner has cited show good people in judicial system are trying to help homeowners and prevent Mortgagees illegal abuse of homeowners in their sociopathic greed for usury illegal ROI as predatory lenders. Court must uphold the Orders of CFPB and all fifty Attorneys General - including Georgia Chris Carr so please grant TPO against eviction and report Mortgagees to Chris Carr and ask him to investigate - just like it upheld DCNG jurisdiction with second TPO. Per Exhibit 1 the Mortgagees have not only violated regular laws, but also the settlement agreement of "more stringent requirements" mandated for three years starting 2021. Where have Mortgagees informed the Court of this? Where is Mortgagees evidence of the required report to CFPB and Attorneys General on instant case mortgage? Cannot evict without that proof. ... Homeowner is preparing this in his car beside home on iPad without computer access! All of home office in bags. ... granting legally mandated TPO and voiding of eviction so homeless Defendant can live in his home ... Per DeKalb judicial website honorable Judge Jackson is "very active in judicial leadership serving on numerous committees of The Statewide Judicial Council, The Council of Superior Court Judges and The Statewide Judicial Taskforce. Judge Jackson was appointed by the President of the State Bar to serve on the newly formed committee of the Georgia Business Court." Instant case is all about Georgia business and how a white-collar criminal business is stealing homes and defrauding courts to prevail. Has Court been defrauded by Mortgagees or, God forbid, corrupted and website accolades a sham? Homeowner knows Court has heart.

EXHIBIT 1

Major mortgage servicer Nationstar agrees to pay over \$90 million to settle claims it harmed homeowners following the Great Recession

Published Mon, Dec 7 2020-5:16 PM EST • Updated Tue, Dec 8 2020-9:07 AM EST





Nationstar, the fourth-largest mortgage servicer in the U.S., is set to pay \$91 million to settle claims brought by the Consumer Financial Protection Bureau and state attorneys general alleging that (*NOTE1) the company failed to honor mortgage forbearance agreements and unfairly foreclosed on homeowners.

From (*NOTE 2) January 2012 to December 2016, the CFPB and 50 state attorneys general claim Nationstar, which is now doing business as Mr. Cooper, engaged in a number of unlawful practices in handling mortgages following the Great Recession. Specifically, the loan servicer failed to honor borrowers' loan modification agreements. Nationstar also allegedly foreclosed on borrowers with pending forbearance applications after promising not to do so and failed to properly handle escrow payments and accounting for homeowners who were in Chapter 13 bankruptcy proceedings.

Nationstar's failings resulted in "substantial consumer harm," CFPB Director Kathleen Kraninger said in a statement.

"Mortgage servicers are entrusted with handling significant financial transactions for millions of Americans, including struggling homeowners. (*NOTE 3) Nationstar broke that trust by engaging in unfair and deceptive practices," Kraninger added.

(*NOTE 4) ... CFPB requires Nationstar to pay \$73 million in restitution to affected borrowers,

A resulting 133-page agreement provides consumer <u>restitution for actions the</u> <u>company took between Jan. 1, 2011 to Dec. 31, 2017.</u>

As a result of the settlement, Connecticut borrowers are eligible to receive up to \$1.06 million. In addition, the settlement benefits Pennsylvania borrowers for up to \$2.75 million in restitution. **Georgia residents will receive upward of \$3.52 million**

Exhibit 7

Relevant Georgia Rules of Professional Conduct

Rule 3.3: Candor Toward the Tribunal

- a. A lawyer shall not knowingly:
- 1. make a false statement of material fact or law to a tribunal;
- 2. fail to disclose a material fact to a tribunal when disclosure is necessary to avoid assisting a criminal or fraudulent act by the client;
- 3. fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel; or
- 4. offer evidence that the lawyer knows to be false. If a lawyer has offered material evidence and comes to know of its falsity, the lawyer shall take reasonable remedial measures.
- b. The duties stated in paragraph (a) continue to the conclusion of the proceeding, and apply even if compliance requires disclosure of information otherwise protected by Rule 1.6.
- c. A lawyer may refuse to offer evidence that the lawyer reasonably believes is false.
- d. In an ex parte proceeding, other than grand jury proceedings, a lawyer shall inform the tribunal of all material facts known to the lawyer that the lawyer reasonably believes are necessary to enable the tribunal to make an informed decision, whether or not the facts are adverse.

The maximum penalty for a violation of this rule is disbarment.

... the lawyer must not allow the tribunal to be misled by false statements of law or fact or evidence that the lawyer knows to be false.

EXHIBIT 8 From Trial Court Filing

- O.C.G.A. § 5-6-46 (2010) Operation of notice of appeal as supersedeas in civil cases; requirement of supersedeas bond or other form of security; fixing of amount; procedure upon no or insufficient filing; effect of bond as to liability of surety; punitive damages
- (a) ... or when such property is in the custody of the sheriff or other levying officer, (note: mortgagees already have title via proven wrongful foreclosure!) or when the proceeds of such property or a bond for its value are in the custody or control of the court, the amount of the supersedeas bond or other form of security shall be fixed at such sum only as will secure the amount recovered for the use and detention of the property, the costs of the action, costs on appeal, interest, and damages for delay. (Note: Mortgagee tricked Court into signing illegal Supersedeas Bond!)

SVISTUNOFF V. SVISTUNOFF [Civ. No. 14831. First Dist., Div. One. Jan. 15, 1952.]"An appeal does not deprive the trial court of jurisdiction to vacate a void order. If it is void upon its face, it may be set aside at any time."

MURPHY v. MURPHY. S93A0512. ... that a void judgment is "void ab initio whenever the defect is apparent on its face..." MYLES v. MYLES. S16F1062, HOOD v. STATE S07G0412. ISLAMKHAN v. KHAN. S16A0105

Under OCGA § 9-12-16, a judgment of a court having no jurisdiction of the person or the subject matter or which is void for any other cause is a mere nullity and may be so held in any court when it becomes material to the interest of the parties to consider it. A void judgment is one that has a defect apparent on its face. Since the trial Court ignored Homeowner's filing, THEREFORE, COURT HAS JURISDICTION INSTANT CASE OF ALL THESE MATTER S24A1170

EXHIBIT 9 QUESTIONS TO BE ANSWERED PER RULE 3.3 NO COURT HAS YET RULED ON QUESTIONS DUE FRAUD

- A. JURISDICTION Mortgagee must prove DeKalb County and the state courts ever had jurisdiction for any of the illegal and contemptuous acts committed by itself and Nationstar:
- 1. Prove to Court the wrongful foreclosure was not illegally done in in violation to jurisdiction of USCA11 as Homeowner complained with exhibit proof.
- 2. Prove the dispossessory based on nullity wrongful foreclosure was not a nullity due no jurisdiction and conducted in contempt to DCN.GA jurisdiction as Homeowner complained with exhibit proof.
- 3. Prove the ex parte hearing had any jurisdiction to grant the eviction order that was never served on Homeowner who was oblivious to looming disaster of eviction while feeling safe awaiting justice in DCN.GA federal courts jurisdiction as exhibits showed.
- 3. Prove the ex parte hearing had any jurisdiction to grant the eviction order that was never served on Homeowner who was oblivious to looming disaster of eviction while feeling safe awaiting justice in DCN.GA federal courts jurisdiction as exhibits showed.
- 4. Prove to the Court that Deutsche as a foreign company is operating legally in the USA per Supreme Court so DeKalb Courts can have jurisdiction to grant any relief to Mortgagee by proving it is properly registered in any state:

Deutsche Bank is operating illegally without being registered in headquarters state with registered agent in violation to U.S. Supreme Court American Bank & Trust Co. v. Federal Reserve Bank, 256 U.S. 350 (1921) A federal reserve bank is not a national banking association within § 24, cl. 16, of the Judicial Code, which declares that such associations, for the purposes of suing and being sued, shall (except in certain cases) be deemed citizens of the states where they are located. P. 256 U.S. 357.

- 5. Prove to Court that Mortgagee has fulfilled judgment to have standing in court die DeKalb to have jurisdiction to grant any relief as Homeowner is winning member #FF64929439 of class action lawsuit in DCMGreenbelt ROBINSON v.
- NATIONSTAR on subordinate RESPA violations as in instant case so makes eviction impossible until full compensation is given for subsequent damages and those acts that are able to be reversed can be so eviction is 100% impossible.
- 6. Prove to Court that Mortgagee has cured the courts ruled breach of contract so has standing for DeKalb to ever have jurisdiction to grant Mortgagee any relief per MALONE V. FED. HOME LOAN MORTG. CORP. CASE NO.: 1:14-cv-193 (WLS) 2016

"The Court finds that the Malones have stated a wrongful foreclosure claim for breach of the duty of good faith. In sum, the Malones have alleged Bank of America breached its duty to foreclose in good faith and that this breach caused the Malones' damages and have thus stated a claim for wrongful foreclosure."

This not a complete list of jurisdictional concerns but sufficient to warrant TRO and grant Rule NiSi hearing. The law is well-settled that a void order or judgement is void even before reversal", VALLEY v. NORTHERN FIRE & MARINE INS. CO., 254 U.S. 348,41 S. Ct. 116 (1920) "Courts are constituted by authority and they cannot go beyond that power delegated to them. If they act beyond that authority, and certainly in contravention of it, their judgements and orders are regarded as nullities; they are not voidable, but simply void, and this even prior to reversal." WILLIAMSON v. BERRY, 8 HOW. 945, 540 12 L. Ed. 1170, 1189 (1850). It has also been held that"It is not necessary to take any steps to have a void judgment reversed, vacated, or set aside, It may be impeached in any action direct or, collateral.' Holder v. Scott, 396 S.W.2d 906, (Tex.Civ.App., Texarkana, 1965, writ ref., n.r.e.). A court cannot confer jurisdiction where none existed and cannot make a void proceeding valid. It is clear and well established law that a void order can be challenged in any court", OLD WAYNE MUT. L. ASSOC. v. McDONOUGH, 204 U. S. 8,27 S. Ct. 236 (1907). Judgment is a void judgment if court that rendered judgment lacked jurisdiction of the subject matter, or of the parties, or acted in a manner inconsistent with due process, Fed. Rules Civ. Proc., Rule 60(b)(4),28 U.S.C.A., U.S.C.A. Const.

B. PARTY

Deutsche must prove to Court per Jurisdiction items 4 - 6 that Mortgagee has any standing in Court to be a party that can be granted any relief.

1. Prove to Court when and how Deutsche became a court authorized party to properly replace Nationstar and Aldridge Pite to replace Albertelli and Balch per:

12 U.S. Code § 2605: Servicing of mortgage loans and administration of escrow accounts: Federal Rule of Civil Procedure 17(a)(1) which requires that "[a]n action must be prosecuted in the name of the real party in interest." See also, In re Jacobson, 402 B.R. 359, 365-66 (Bankr.W.D. Wash. 2009); In re Hwang, 396B.R. 757, 766-67 (Bankr. C.D. Cal. 2008). Federal Rule of Civil Procedure 17(a)(1) which requires that "[a]n action must be prosecuted in the name of the real party in interest."See also, In re Jacobson, 402 B.R. 359, 365-66 (Bankr. W.D. Wash. 2009); In re Hwang, 396 B.R. 757,766-67 (Bankr. C.D. Cal. 2008). Mortgage Electronic Registration Systems, Inc. v. Chong, 824 N.Y.S.2d 764 (2006). MERS did not have standing as a real party in interest under the Rules to file the motion. The declaration also failed to assert that MERS, FMC Capital LLC or Homecomings Financial, LLC held the Note.

C. FRAUD ON COURTS

Mortgagee must prove there was ever any jurisdiction and party rights and did not fraud the courts:

- 1. Prove to the Court that Homeowner was ever late on a payment and that Mortgagees did not breach contract.
- 2. Prove to the Court that Albertelli was a company allowed to do business in Georgia and practice law in Georgia and was not operating illegally after perjuring on Secretary of State corporate application to be a recognized business with legal rights as such in Georgia to sue and foreclose.
- 3. Prove to the Court that there was no fraud on court perpetrated in Dispossessory hearing by misrepresenting to DeKalb magistrate judge that DeKalb had any jurisdictional rights to grant a dispossessory order when there was a standing DCNG order and jurisdiction prohibiting.
- 4. Prove to the Court that there was no fraud on court perpetrated in ex parte hearing by misrepresenting to DeKalb magistrate judge that DeKalb had any jurisdictional rights to grant an eviction order.
- 5. Prove to the Courts that there was no fraud on the Court when preventing the correction of clerical error of putting appeal of nullity Dispossessory into wrong case file that resulted in court error of voiding the TRO that was honoring the still binding original TRO against foreclosure until a final non-appealable order in federal courts.
- 6. Prove there was no fraud on courts when it advertised and violated the still binding TRO of original case.
- 7. Prove to the Court that Mortgagees have informed the Marshals and Sheriffs that the Mandate and Supersedeas the Final Order is reliant are presently in the jurisdiction of Supreme Court of Georgia.
- 8. Prove there was no fraud on Court when Mortgagee misrepresented value of home to be awarded a first time ever request a supersedeas (never requested in federal courts and contradicted federal court filings) months after fact and that fraud for supersedeas bond did not cause court to err granting an order that violates O.C.G.A. 5-6-46

These interrogatories are asked with invoked Rules 3.3 and Federal Court Rule 1 for counsel. Any lies are immediate ab initio all federal and state courts rulings and orders subsequent to Homeowner's original filed notice of default of original lawsuit and revocation of license to practice law. "No" requires evidence and case cites.

Any other answer than Yes, or No without law cite and proof substantiating "No" is Admission because all evidence is available to verify.

Balch and Anulewicz to answer with Deutsche and Nationstar and Albertelli as all served:

- 1. Albertelli was acting as a debt collector for Nationstar on original foreclosure the TRO prevented? Yes or No.
- 2. Albertelli emailed the court order TRO and original Complaint to Mortgagees so the foreclosure was halted? Yes or No
- 3. Albertelli's secretary was honest and correct per note on rejected Sheriff affidavit that Albertelli violated O.C.G.A. § 14-2-1530 (5) An incorporator, director, officer, or agent of the foreign corporation signed a document he knew was false in any material respect with intent that the document be delivered to the Secretary of State for filing; by filing out the Secretary of State ("SoS") application with himself as corporate officers in Florida and himself as registered agent in Georgia? Yes or No.
- 4. Mortgagees refused to affirm the truth of Homeowner claim that Albertelli knowingly submitted a false document to SoS so Albertelli's default of Secretary of State service would not be binding? Yes or No.

- Albertelli received the Complaint and Summons per SoS at his Florida office, also via Atlanta office attorney Yelli (no longer with Albertelli) but chose not to answer? Yes or No.
- 6. Mortgagees conspired with Albertelli to start advertising the foreclosure in contempt of DCNG without an order in federal courts allowing a foreclosure? Yes or No.
- 7. How were Mortgagees with Albertelli able to guess to start advertising within a week of DCNG order hoping impossible for Homeowner to file timely appeal?
- 8. Mortgagees knew the appeal of DCNG order was filed so the federal courts still had jurisdiction without a final non-appealable order allowing the foreclosure (phone records, date stamped filing, electronic filing access)? Yes or No.
- 9. Mortgagees and/or Albertelli had ex parte communications directly or indirectly with Presiding Judge Hunter about service and that is why contrary to role of Presiding judge to grant ex parte TRO upholding previous Superior Court TRO and federal court jurisdiction she rationalized her denial for TRO solely "no proof of service"? Yes or No.
- 10. There were no competing bids at foreclosure advertised and conducted by Albertelli when Nationstar bought in their own debt for more than advertised? Yes or No.
- 11. Mortgagees knew Homeowner sued to have the foreclosure voided? Yes or No?
- 12. The 11th Circuit Court ruled the Mortgagees had a breached contract? Yes or No.
- 13. Mortgagees knew Albertelli was not SoS compliant and waited until the DCNG had ruled so thinking case was closed so safe to remedy Albertelli

- fraud to switch from illegal himself as Registered Agent to be Corporate Service Company and showed change to courts claiming "complaint" but that was too late <u>after</u> the second SoS service was again defaulted? Yes or No.
- 14. Mortgagees never disclosed to the courts that Homeowner was correct that Albertelli had been served per SoS because he was never the required resident citizen to be a legally proper Registered Agent and attempted sheriff service at Atlanta office was rejected and even Balch could not find Atlanta office for Registered Agent Albertelli and as CEO he was in Florida? Yes or No.
- 15. Balch/Anulewicz know per federal court rulings if Albertelli, as a debt collector Defendant due knowingly pursuing foreclosure despite first breach, had Defaulted it would mean the Removal was improper because Albertelli never gave consent, there was never unamity, etc. required for Removal? Yes or No.
- 16. Mortgagees never corrected DCNG Judge Story's ruling there was no way

 Homeowner's suit against Deutsche was proper because he "could not see any
 way Deutsche could be associated with the mortgage"? Yes or No.
- 17.DEUTSCHE BANK NATIONAL TRUST COMPANY has no authority to be doing business or be in court because is not properly registered in USA. Yes or NO. If Deutsche is authorized in USA provide proof and who is registered agent and where to serve. Balch/Anulewicz masterminded and orchestrated Deutsche with new debt collector Aldridge Pite and Dallas Ivey to pursue Dispossessory and Writ of Eviction? Yes or No.
- 18.Balch/Anulewicz was coordinating with Aldridge Pite and Dallas Ivey and Albertelli on all legal proceedings (phone records, emails, etc.) but never submitted to courts to represent Aldridge Pite and Albertelli as Defendants in the Federal cases? Yes or No.

- 19. Aldridge/Ivey never gave notice to Homeowner and met ex parte with a DeKalb magistrate judge to get the Writ of Eviction wherein jurisdiction was misrepresented contrary to DCNG Court order? Yes or No
- 20. The second properly granted TRO was voided solely on matter of "no jurisdiction" because was misfiled into wrong case # that did not have jurisdiction because of Mortgagees (improper) Removal. So how do mortgages explain they (mis)used no jurisdiction on the underlying case against the dependent case that per law would have no jurisdiction either to get an improper eviction? Yes or No. (Note Mortgagees counsel want to play morons they cannot understand question it only proves the point that they cheated to deceive a judge on their illegal actions creating conflict between federal and state courts on matter of jurisdiction!)
- 21. Provide proof that Deutsche, who went rouge from Nationstar, is a properly substituted Plaintiff since DCNG order could not see how Deutsche was involved in case?
- 22. Why did Deutsche go to all the time and expense to hire new bill collectors Pite/Ivey to replace Albertelli since Albertelli had all the history of entire time? 23. Why did Mortgagees change from what it presented to federal courts after wrongful foreclosure, that the house is sufficient collateral so supersedeas bond not necessary, now requesting supersedeas after Homeowner exposed their bad acts in state courts?
- 24. Was foreclosure wrongfully done in contempt of federal court jurisdiction, standing state TRO (Exhibit A) and first breach? Yes or No.
- 25. Was Dispossessory hearing conducted after Removal of appeal of wrongful foreclosure and before any non-appealable final order granting state courts jurisdiction? Yes or No.

EXHIBIT A

ADMITTED INTERROGATORIES PROVE THE MORTGAGEES ET AL NEVER CURED THE BREACHED CONTRACT SO NEVER HAD LEGAL STANDING TO FORECLOSE, MORTGAGEES ET AL ILLEGALLY FORECLOSED IN CONTEMPT ON COURT ORDERS AND FEDERAL COURT JURISDICTION AND THE STATE NEVER HAD JURISDICTION FOR ANY ORDERS SINCE MORTGAGEES ET AL IMPROPER REMOVAL

Interrogatories Admitted in ongoing State Superior Court 19CV10619

These interrogatories are asked with invoked Rules 3.3 and Federal Court Rule 1 for counsel. Any lies are immediate ab initio all federal and state courts rulings and orders subsequent to Homeowner's original filed notice of default of original lawsuit and revocation of license to practice law. "No" requires evidence and case cites. Any other answer than Yes or No with law cite and proof substantiating "No" is Admission because all evidence is available to verify. Balch and Anulewicz to answer with Deutsche and Nationstar and Albertelli as all served:

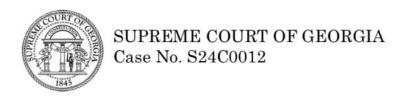
- 1. Albertelli was acting as a bill collector for Nationstar on original foreclosure the TRO prevented? Yes or No.
- 2. Albertelli emailed the court order TRO and original Complaint to Plaintiff(s) so the foreclosure was halted. Yes or No
- 3.Albertelli's secretary was honest and correct per rejected sheriff's service note Albertelli violated O.C.G.A. § 14-2-1530 (5) An incorporator, director, officer, or agent of the foreign corporation signed a document he knew was false in any material respect with intent that the document be delivered to the Secretary of State for filing by filing out the Secretary of State ("SoS") application with himself as corporate in Florida and himself as registered agent in Georgia? Yes or No.
- 4. Balch/Anulewicz purposefully tried to prevent the truth of question #3 to be known by judges by claiming Albertelli had other Georgia offices, etc., Yes or No.
- 5. Balch/Anulewicz refused to affirm the truth of Homeowner claim that Albertelli knowingly submitted a false document to SoS so Albertelli's default to default of Secretary of State service would not be binding? Yes or No.
- 6. Balch coached Albertelli not to file anything into courts despite being a party. Yes or No.
- 7. Albertelli received the Complaint and Summons per SoS and employees but chose not to answer? Yes or No.
- 8. Balch/Anulewicz and Albertelli collaborated so Albertelli never presented himself, law firm and truth into any courts? Yes or No.
- 9. Balch/Anulewicz conspired with Albertelli to start advertising the foreclosure in contempt of court without an order in federal courts allowing? Yes or No.
- 10. How were Balch/Anulewicz with Albertelli able to guess when to start advertising within a week of DCNG order almost impossible for Homeowner to file appeal in time?
- 11. Balch/Anulewicz knew the appeal of DCNG order was filed so the federal courts still had jurisdiction without a final non-appealable order allowing the foreclosure (phone records, date of stamped filing delivered and electronic filing access)? Yes or No.

- 13. There was no competing bids yet the price paid by Mortgagees to reclaim the title was for more than advertised price by Albertelli when Nationstar bought in their own debt? Yes or No.
- 14. Balch/Anulewicz knew Homeowner sued to have the foreclosure voided? Yes or No?
- 15. Balch/Anulewicz coordinated and advised Deutsche and/or Nationstar for Deutsche to hire new counsel Aldridge Pite to replace Albertelli for Dispossessory? Yes or No.
- 16. Balch/Anulewicz knew Albertelli was not SoS compliant and waited until the DCNG had ruled and thinking case was closed and safe then got Albertelli to switch from himself as Registered Agent to be Corporate Service Company and showed that change to court claiming "compliant" but after the SoS service was defaulted? Yes or No.
- 17. Balch/Anulewicz never disclosed to the courts that Homeowner was correct that Albertelli had been served per SoS because he was never the required resident citizen to be a legally proper Registered Agent? Yes or No.
- 17. Balch/Anulewicz know that if Albertelli as a bill collector Defendant had Defaulted it would mean the Removal was improper because Albertelli never gave consent, there was never unanimity, etc. required for Removal? Yes or No.
- 18. Balch/Anulewicz never corrected DCNG Judge Story's ruling there was no ways Homeowner's suit against Deutsche was proper because he "could not ascertain any way Deutsche could be associated with the mortgage"? Yes or No.
- 19. Balch/Anulewicz masterminded and orchestrated Deutsche with new debt collector Aldridge Pite and Dallas Ivey to pursue Dispossessory and Writ of Eviction? Yes or No.
- 20. Balch/Anulewicz was coordinating with Aldridge Pite and Dallas Ivey and Albertelli on all legal proceedings (phone records, emails, etc.) but never submitted to courts to represent Aldridge Pite and Albertelli as Defendants in the Federal cases? Yes or No.
- 21. Aldridge/Ivey never gave notice to Homeowner and met ex parte with a DeKalb judge to get the Writ of Eviction? Yes or No.
- 22. Aldridge/Ivey in ex parte hearing with DeKalb magistrate judge misrepresent to her that she had jurisdiction to grant the Dispossessory and/or Writ of Eviction? Yes or No. Why did Mortgagees never give Homeowner service of eviction order?
- 23. How is Deutsche, who went rouge from Nationstar, a properly substituted Plaintiff?
- 24. Why did Deutsche hire new bill collectors Pite/Ivey to replace Albertelli who had the case the entire time?
- 25. Why did Mortgagees change from what it presented to federal courts after wrongful foreclosure, that the house is sufficient collateral so supersedeas bond not necessary, now requesting supersedeas when Homeowner is exposing all their acts in an appeal in state courts?
- 26. House advertised for foreclosure in contempt of federal court jurisdiction? Yes or No.
- (*NOTE Never gave Homeowner or Court notice of advertising!!!)
- 27. Was foreclosure wrongful in contempt of federal court jurisdiction? Yes or No.
- 28. Was Dispossessory hearing conducted after Removal of appeal of wrongful foreclosure and before any non-appealable final order granting state courts jurisdiction? Yes or No.
- 29. Was there clerical error of filing appeal of magistrate case into a superior court preexisting case that had been Removed by Balch instead of filing appeal properly into new created number case for appeal and Balch/Aldridge Pite violated Rule 3.3 by perpetuating error to have second TPO voided? Yes or No.
- 30. Has Balch/Adridge-Pite proactively helped any court correct errors or share truth with a court per Rule 3.3 (beyond consequences of their actions)? Yes or N

REQUESTING LEAVE TO FILE THE DOCUMENT

(Please vacate this requirement and instead remove corrupt attorneys and judges).

Rev. Christopher M. Hunt, Sr. Ph.D, as was previously accepted mortgage fraud case, has. filed in good faith solely for Spirit and intent of law, truth and justice to be actualized and therefore fulfills attached order because the document and arguments therein were prepared in good faith and not for vexatious purposes. Homeowner simply wants justice and name redeemed and will not quit until he gets justice and compensation.



March 5, 2024

The Honorable Supreme Court met pursuant to adjournment.

The following order was passed:

CHRISTOPHER M. HUNT, SR. v. DEUTSCHE BANK TRUST COMPANY.

Upon consideration of the Motion for Reconsideration filed in this case, it is ordered that it be hereby denied.

This Court notes that the petitioner, Christopher M. Hunt, Sr., has filed in this Court numerous petitions for certiorari, applications, appeals, and associated motions. These filings have consistently been frivolous, procedurally defective, or improperly filed in this Court, and, as a result, they have been denied, dismissed, or transferred. Hunt's consistently improper filings constitute an abuse of the judicial system and cost courts and opposing litigants unnecessary time and trouble. Thus this Court, under its inherent power to manage its docket, hereby orders that, prior to filing any document in this Court, and within the time period provided for filing such document, Hunt must direct to the clerk of this Court the document sought to be filed, together with a statement that the document and arguments therein were prepared in good faith and not for vexatious purposes, and requesting leave to file the document. After review of the statement and submitted document, either the document will be filed in this Court, or the filing will be denied and the document returned to Hunt. A copy of this order MUST be attached as an exhibit to any document that Hunt files in this Court hereafter.

All the Justices concur.

SUPREME COURT OF THE STATE OF GEORGIA

Clerk's Office, Atlanta

I certify that the above is a true extract from the minutes of the Supreme Court of Georgia.

Witness my signature and the seal of said court hereto affixed the day and year last above written.

This John , Clerk