

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	§	

REPLY TO RESPONSE 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
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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. (NASDAQ 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 Sub1 LLC and Nationstar Sub2 LLC. Nationstar Sub1 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)

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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 (Mandated Joiner)	§	
VARUN KRISHNA CEO Rocket Mort.	§	
<u>Defendants</u>	§	

REPLY TO RESPONSE 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 REPLY TO RESPONSE MOTION TO REOPEN OR IN ALTERNATIVE NOTICE OF INTENT TO APPEAL per Wisdom “she” AKA Lady Justice who holds even scales as objective Court of equity

and law, blindfolded to personalities, wisest judge in history per famous case Solomon's Sword/Dividing Baby Proverbs 8: "The fear of the Lord is to hate evil; Pride and arrogance and the evil way and the perverse mouth I hate. Counsel is mine, and sound wisdom; I am understanding, I have strength. By me judges reign, and rulers decree justice." and avers:

INTRO: COURT'S HONOR AND CANNONS AT STAKE

Posted on www.MrCooperCorrupt.com

Let's cut through Defendants' and their attorneys' illegal fraud on court, violations of Candor to the Tribunal, lies, slander and head games. Court knows there may be a murder case that has a lot of circumstantial evidence and the corrupt cops planted evidence so the accused was looking guilty and he was about to lose his trial and receive death penalty. But then, while the jury was in deliberation, the solicitor is given new DNA evidence that does not match the suspect and matches another suspect who was released. The righteous, honest Solicitor stops the case and shows the judge new evidence. The good judge stops the case and let's suspect go free.

Homeowner will put up his ordination and title to his home against the Defendant's attorneys' Bar license based on truth in this filing.

The proven white-collar criminal Mr. Cooper is so desperate to get Mr. Cooper sold for \$9.4Billion to Rocket Mortgage so corporate officers get "defendants" windfall profits with CEO Jay Bray making \$100+Millions in stock while matters

of instant case being in gross willful contempt to two federal court order Settlement Agreements and violating three years probation imposed by all fifty states attorneys generals and Consumer Finance Protection Bureau “CFPB” by trying to steal 100% legally right homeowner(s) home(s) WHO NEVER MISSED A PAYMENT! The DNA of instant case:

1. Submit to honorable court evidence Homeowner ever was late or missed a payment!
2. Since something is seriously wrong when they cannot produce the evidence the Homeowner ever was late or missed a payment then per instant case, distinct from Georgia cases, Mr Cooper show the honorable Court any evidence they have no acted in contempt to two federal court orders and three years probabtion by all fifty states attorneys general and CFPB trying to steal 100% legally right Homeowner’s \$1M home with \$500,000 equity for his retirement and children’s college education.

Since Defendants and their attorneys keep refusing to address any matters of instant well pled lawsuit but instead illegally refer to Georgia case: USCA11 RULED THEY BREACHED THE CONTRACT SO DCMIDDLEGA *MALONE* MEANS THEY CANNOT ENFORCE ANY PART OF CONTRACT UNTIL CURE BREACH! Mr. Cooper paid more than \$200+Millions in fines for damaged homeowners but Homeowner has not seen a \$1. Surely DCN.TX is not guilty of

illegally severe federal court bias per honorary Judge Posner who resigned in protest “pro se are (mis)treated like trash.” The Mortgagees attorneys are resorting to slandering Homeowner and lying to Court and twisting law to manipulate honorary Court. The Homeowner’s factual accusations with law cites are supported by all fifty states attorneys general and CFPB so case should have never been closed. Per Mortgagees own cite of Fed. R. Civ. P. 60 all are fulfilled to reopen case:

- (1) mistake, inadvertence, surprise, or excusable neglect;
- (2) newly discovered evidence that, with reasonable diligence, could not have been discovered in time to move for a new trial under Rule 59(b);
- (3) fraud (whether previously called intrinsic or extrinsic), misrepresentation, or misconduct by an opposing party;
- (4) the judgment is void;
- (5) the judgment has been satisfied, released, or discharged; it is based on an earlier judgment that has been reversed or vacated; or applying it prospectively is no longer equitable; or
- (6) any other reason that justifies relief.

December 3, 2024, the U.S. District Court for the Eastern District of Texas issued that nationwide preliminary injunction preventing the federal government from enforcing the CTA, but a motions panel of the Fifth Circuit granted a stay of the district court's injunction on [December 23, 2024](#). The motions panel simultaneously expedited the case and sent the case to the next available merits panel of the Fifth Circuit.

Upon receiving the case, on December 26, 2024, the Fifth Circuit merits panel issued an order vacating the stay, thereby reinstating the nationwide preliminary injunction. “**In order to preserve the constitutional status quo while the merits panel considers the parties' weighty substantive arguments,** that part of the motions-panel order granting the Government's motion to stay the district court's preliminary injunction" is vacated, the merits panel wrote.

Instant case involves hundreds of thousands homeowners who were abused and the instant case was gross, willful contempt of two federal court orders and three years probation by all fifty states attorneys general and CFPB with attempted theft of senior citizen minister's \$1,000,000+ home he built with \$500,000 honesty hard earned equity. Would judge Ada Brown enable a felon burglar who stole \$10,000+ electronics from a home in violation to probation for a previous burglary? Instant case Defendants are figuratively giving middle finger to courts, attorneys general and CFPB because wealthy and large law firm while stealing an entire home! Oh, but these Defendants are not a desperate poor ex-con trying to make money to survive who would be sent to jail, they are multi-billion-dollar companies with huge law firms so they can even tell judge "F off" and fraud magistrate with lies and misrepresentations. Remember Homeowner's original complaint showed Defendants were on probation with more stringent requirements than law! Defendants have refused to honor Court and produce any evidence they have complied with court order and probation!

Now going through Defendants fatally flawed filing that also proves case must be reopened per Defendants' page 2 B. LEGAL STANDARD:

A. INTRODUCTION

5. By way of the Motions, Plaintiff attempts to reopen the case by citing to letters he sent to non-parties (**NOTE: false as Court knows all fifty states Attorneys General, CPB and federal officers over Rocket purchase pf Mr. Cooper*) documents he filed unilaterally in another matter (**NOTE: only evidence of Georgia case like Exhibit 1 since Defendants keep unethically referring to Georgia*

case to distract and lie to Court from distinct issues of instant case) and questioning the authority of United States Magistrate Judge Rebecca Rutherford.(God damn slanderous twisted lie – she has authority as a defrauded Magistrate judge but she was precluded by form mandating only a judge with jury were to adjudicate case due forewarned current outcome)

This is a violation of Candor to Tribunal, lying, twisted hypocritical! Fed. R. Civ. P. 60 Homeowner has objected to the Defendants stubborn referral to proven corrupted and compromised Georgia cases concerning other matters that are not yet resolved to trick Court to dismiss instant case about completely separate and distinct matters. Since Defendants refuse to honor oath as Officers of Court and practice law properly by addressing issues of instant lawsuit, Homeowner showed the Court the Defendants folly to rely on Georgia case per Exhibit 1. Defendants willfully ignore matters of instant case, misrepresent Georgia cases and fraud court refusing to provide evidence required for a Dismissal – especially Dismissal with prejudice! And per Exhibit 1 the Texas Courts want to distant themselves as far as possible from corrupted Georgia courts like when Georgia was slavery Confederate state causing Civil War. Court must remain objective and within Spirit and intent of law. It cannot play legal oligarchy games favoring big business as attorneys on their website on internet openly admit the federal courts are more favorable towards big business. But instant case goes way beyond favor, it is unconstitutional bias and prejudice in violation of law given the enormity of case, law and case history. Surely Court is not going to participate and enable white-collar felony crimes per George

Carlin YouTube “they have judges in their back pocket” just first minute

<https://youtu.be/cKUaqFzZLxU?si=LTQrfDYTuxwCDOP6>

Homeowner has not questioned the authority of Magistrate but how she got involved after Homeowner denied magistrate and has shown her gross errors.

This fulfills Rule 60 (6) any other reason that justifies relief.

6. Moreover, the Motions present the same, repetitive arguments presented in Plaintiff's numerous prior filings, all of which lack any substance or authority, and as a result have been denied.

Homeowner has articulated his case very well, presented the law and case history. The attorneys are just mental prostitutes selling what's between their ears instead of their legs – which is far worse than street sex prostitutes. They admitted by omission refusing to address the matters of instant Texas case because they know they are guilty as hell. All they did is refer to Georgia cases to defraud and distract court - but again the crimes and contempts in Georgia are separate and distinct from Texas instant case. The Magistrate failed to address one issue of instant case which is the contempt to two federal court orders by all fifty states attorneys general and CFPB! Mortgagees have not provided one piece of required information to show they have complied with court orders and probation and prove the Homeowner is 1/10 they slander him.

This means case must be reopened per Rule 60 (3) fraud (whether previously called intrinsic or extrinsic), misrepresentation, or misconduct by an opposing party;

7. Because the Motions fail to provide any support to reopen this lawsuit, they should be denied.

The closing with prejudice contradicts and conflicts with two federal court order and three years probation! Ready to go to Supreme Court of U.S. if \$Multi-billions and soon \$Trillions Mr. Cooper per George Carlin has bought Texas courts?

Case must be reopened per Rule 60 (4) the judgment is void;
(5) the judgment has been satisfied, released, or discharged; it is based on an earlier judgment that has been reversed or vacated; or applying it prospectively is no longer equitable; or

Also New Evidence that mandated joinder party Texas attorney general Ken Paxton will present to Court that the nullity closure with prejudice prevents so case must be reopened and Ken Paxton present new evidence only he has per Rule 60 (2) newly discovered evidence that, with reasonable diligence, could not have been discovered in time to move for a new trial under Rule 59(b)

ADDITIONALLY: Please explain what the use of the form declining to have a magistrate and instead choosing to go only before judge with jury trial? Court may be allowed to choose if not requested, but there was no order denying Homeowner's request nor reasons given. The Magistrate proven struck evidence of four+/- filings on a procedural technicality of incompatible software between DCN.TX and his iPad Pro that is unique to DCN.TX, no other courts have the problem. Homeowner was

forced to use the court's website email system with clerks' approval! All was approved! Yet Magistrate illegally struck filings containing all-important evidence and law without a warning! This does not seem fair that white-collar Mortgagees can default on service, fraud courts, violate laws, act in gross willful contempt to two federal court orders and violate three years probation but Court gives them head - legal reasoning (and if this analogy upsets any legal oligarchy egos then you need to pray and ask how far have you fallen from God's grace and oath as officer of law while court's honor being destroyed) – but when a forced pro se uses with with clerk permission court's website filing email system due to proven software incompatibility he has four filings retroactively, no warning struck and case is forwarded to Court after no ruling on motion to unstrike still pending. Even so, the remaining filings prove case sufficient for jury trial. Especially with unstriking per still pending motion with forthcoming testimony by Ken Paxton with evidence.

Your Honor Ada Brown this case effects

- Mr. Cooper has not provided Court one piece of evidence Homeowner was ever late or missed a payment.
- Mr. Cooper has not provided any evidence they did of even one act of the many required “more stringent than law” of probation to make sure they never again abuse homeowners and steal more homes.

- Mr. Cooper has refused to address the matters of instant case that is separate and distinct from Georgia cases. The attorneys have only addressed the Georgia cases wherein Exhibit 1 fraud on court and corruption is so severe they got their court reporter to alter the transcripts and trial court denied motions to allow access to original unaltered recording of transcript and Zoom recording! Texas Federal Court must distinguish itself from such illegal acts!
- Court must allow mandated joinder party Texas Attorney General Ken Paxton to appear and present his evidence for instant case! Even worse Court has refused to grant order in violation of 28 U. S. Code § 2254(g) for Ken Paxton to obtain original transcript and Zoom recording evidence for instant case!

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 SEE www.MrCooperCorrupt.com that has this filling as well as Exhibit 1 so Court can decide if love and protect honor of court more than they hate forced against

desires pro se who are the modern day blacks of legal oligarchy Dred Scott justices or hated indigenous Indians.

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.
4. Grant Order for Texas AG Ken Paxton to access the original unedited court reporter transcripts and Zoom recording of Georgia 19cv10619 that has evidence for instant case and submit verified true copies to Court.

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

IF NOT REOPEN CASE THIS IS NOTICE OF INTENT TO APPEAL.

Prayerfully and Respectfully and Submitted 15th & 27th August, September 12, 2025.

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

Christopher M. Hunt, Pro Se 5456 Peachtree Blvd. #410

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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 2,023 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 27th August 2025

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

Christopher M. Hunt, Sr. Appellant Pro se

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JAY BRAY Chairman CEO, Et Al	§	
	§	JURY TRIAL
Defendants	§	

CERTIFICATE OF SERVICE

I have sent a copy of this this REPLY TO RESPONSE MOTION TO REOPEN CASE OR IN ALTERNATIVE NOTICE OF INTENT TO APPEAL Court system this 9th September. 2025 to:

Consumer Financial Protection Bureau 1700 G St. NW Washington, DC 20552
cfpb_regulatoryimplementation@cfpb.gov

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Sincerely,

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

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