Eviction Citation; Cause No. E2240117.

Freedom Mortgage Corporation,) In the Court of
it's successors &/or assigns,) the Justice of the Peace,
Plaintiffs,)) for Precinct 2,
) of Midland County, Texas.
Vs:)
) Motion to Dismiss for
Christine M. Huddleston, Michael Moore,) Failure to State a Complaint up-on which
& All Other Occupants of: 1001 South County) Relief can be Granted;
Road 1060, Midland, Texas, [79706]) in Multiple Instances.
Defendants.)

1: Legal-Fiction Corporation Plaintiffs have Failed to Declare, that, it or any of its agents or assigns, have Ever Been in the Actual Physical Possession of the property here in question.

In their complaint's concluding paragraph 5/V, Plaintiffs actually declare, that: "Plaintiff prays that ... on the final hearing of this case Plaintiff recover from Defendants a judgement of possession of thesubject property, ...". The key word there-in, being "Recover".

"Recover", means getting something back which was taken out of your previous possession. All Forcible-Detainr Law is Precisely Based on these Common-Law Principles, of a "Prior Peaceable Possession". Aka "Sesin". Plaintiffs are Using the Word "Recover", in its Appropriate Legal-Context, in their efforts to State a Complaint up-on which Relief can be Granted.

How-ever; Plaintiffs have Not Provided the Necessary Foundation for them to Invoke proper legitimate "Forcible Detainer" Process; Because, they have Not Declared Any Necessary "Prior Peaceable Possession" of the real-property here in question.

And the sad fact is, actually, they are not even capable of making such declaration. Here-under; the Plaintiffs case should be dismissed, with prejudice.

Because of the terrorizing nature of the brutally short-time-frames invoked by the Plaintiffs in this case, the multiple other counts in this motion will not be presented in this rushed-edited version of this motion to dismiss; but, hopefully soon, a more complete motion of this nature will be completed.

Respectfully Submitted;

Michael Moore, &/or Christine M. Huddleston/Moore; 1001 South County Road 1060, Midland, Texas, [79706]. mike.moore1028@gmail.com / 432-889-6361.