

FREEDOM MORTGAGE	§	IN THE COUNTY COURT
CORPORATION, its successors	§	
and/or assigns;	§	OF MIDLAND COUNTY
	§	
Original-Case Plaintiffs,	§	COUNTY COURT AT LAW NO. 2
V	§	
	§	CAUSE NO. CV35685
Christine M Huddleston	§	CAUSE NO. EV2240117
Michael Moore, and all other	§	CAUSE NO. CV29882
Occupants of 1001 S County	§	CAUSE NO. CV51464
RD 1060, Midland, Texas [79706]	§	
	§	
Original-Case Defendants	§	
	§	

Notice Of Appeal.

We original-case defendants here-by submit this 'Notice of Appeal' document to this County Court-At-Law.

Based here-on; we pray to the True God of Israel, above, that, this Court will become inspired to Stay it's 'Writ of Possession' document & actions against us, both of which are presently designed to direct the County Sheriff to Forcibly Evict us from our home of many years.

We believe this Court Has Constitutional Duties to so Stay that action, based on numerous issues, including the fact, that, we have been proceeding in 'Propria Persona' manner, similar to "Pro Se" manner. Case law supportive of this point reads as follows:

". . . the allegations of the pro se complaint, . . . we hold to less stringent standards than formal pleadings drafted by lawyers, . . ."

Haines v. Kerner, 404 U.S. 519, 30 L. Ed. 2nd 652 ; US Supreme Court: 1972.

Further; in our efforts to make sure that we have been proceeding in accordance with applicable "Law", we have contacted over 75 attorneys, all of whom have refused to assist us with this case. We have researched applicable "Law" to the best of our ability, & based on that research & the motions we have filed, and after judgment was rendered; we formed what we believed to be our well-grounded & well-reasoned belief, that, according to this Court's normal procedure, we had 90 days to file this form of a 'Notice of Appeal' document.

We believe we are Not Guilty of being "Ignorant" about these issues; but, we do admit, that, it is possible, that, we could have made some honest & good-faith mistakes here. We have been doing the best that we are capable of here.

We pray to the True God of Israel, that, this 'Notice of Appeal' document will inspire this Court to Stay the Actions of the Sheriff under this Court's 'Writ of Possession' document & its 'Forcible Detainer' case, until after our Appeal of all of this has been properly heard.

A few more citations, which show that this Court has Duties to our Common Texas People, to proceed in this precise manner, read as follows:

Texas Rules of Civil Procedure: Part 1: Rule 1: Objective of Rules:

The proper objective of rules of civil procedure is to obtain a just, fair, equitable and impartial adjudication of the rights of litigants under established principles of substantive law.

To the end that this objective maybe attained with as great expedition and dispatch and at the least expense both to the litigants and to the state as maybe practicable, these rules shall be given a liberal construction.

Rule 45: "All pleadings shall be construed so as to do substantial justice."

Rule 191.3 (c): The signature of an attorney or party on a discovery request, notice, response, or objection constitutes a certification that to the best of the signer's knowledge, information, and belief, formed after a reasonable inquiry, the request, notice, response, or objection:

(1) is consistent with ... and warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law;

(2) has a good faith factual basis; (3) is not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation;

and (4) is not unreasonable or unduly burdensome or expensive, given the needs of the case, ... and the importance of the issues at stake in the litigation.

Dated this 25th day of November 2024.

Michael Moore

Christine Huddleston Moore