

In the “Midland County Constitutional-Court”,
the “Midland County-Commissioners-Court”,
the “Midland County District-Court”,
& the “Midland County Court-At-Law”; Concurrent Jurisdictions.

<p><u>“Freedom Mortgage Association”,</u>) it’s Successors &/or Assigns, & numerous others;) <u>Original Plaintiffs, &:</u>) <u>Criminal-Counter-Complaint Defendants;</u>) <u>Vs:</u>) <u>Christine M. Huddleston Moore,</u>) <u>Michael Moore, & and all other occupants of</u>) <u>1001 South County Road 1060,</u>) <u>Midland, Texas [79706],</u>) <u>& the State of Texas, Ex-Rel;</u>) <u>Original Defendants, &:</u>) <u>Criminal-Counter-Complaint Plaintiffs.</u>)</p>	<p>441st District-Court for Midland County; Case #: <u>CV51464;</u></p> <p>Midland County Court-At-Law Case #s: <u>CV29882, & CV35685;</u></p> <p>&: Court of JoP Precinct-2 Case #: <u>E2160017.</u></p> <p><u>Motion for New Trial.</u></p>
---	---

We, the Original-Case Defendants & Criminal-Counter-Complaint Plaintiffs in this case, have filed in the Midland County Clerk’s Office, our Criminal-Counter-Complaint against the Original-Case Plaintiffs & Criminal-Counter-Complaint Defendants in this case. We also filed this & multiple related documents in the related & most recent JoP-Court Forcible-Detainer Case which was brought against us.

In both that JoP-Court & the County Court-At-Law, Applicable Law Mandates that the Merits of our Criminal-Counter-Complaint Should have been Addressed Before this Forcible Detainer case was heard. In both of those Courts, our Criminal-Counter-Complaint Included our Claims of a “Trespass to Try Title” Action, as attached to our Criminal-Counter-Complaint.

We the Original-Case Defendants & Counter-Plaintiffs, have had Peaceful Possession of the Property involved in this case, since the Original Violation of our Constitutionally-Guaranteed Rights, by & through the Illegal Seizure of our Property, as complicated by a Cloud on the Title to this Property.

Our Criminal-Counter-Complaint, includes Claims of Economic-Damages which Exceed the Jurisdictional-Limits of the County Court-At-Law, which are set at \$500,000.00 .

Also; in our Criminal-Counter-Complaint, we have Demanded our Constitutionally-Guaranteed Right to a “Trial by Jury”.

We here-in also Motion for the Removal of this Case, from the County Court-At-Law, & over to Midland-County’s 441st-District-Court; or, (perhaps better), to the County-Commissioners-Court.

And because the County-Judge Presides in the County-Commissioners-Court, & because the County-Constitutional-Court Follows the County-Judge; here-under, we suggest, All Constitutional-Authority of the County-Constitutional-Court Be Merged in-to these Proceedings in the County-Commissioners-Court.

Applicable Law Mandates that the Court Rules In Our Favor.

Respectively,

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