

SEP 26 2013

JOHN A. JOHNSON, CLERK

BY L. JOHNSON, DEPUTY

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2 Plaintiff
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8 SUPERIOR COURT OF CALIFORNIA
9
10 COUNTY OF LOS ANGELES

11 MARY CUMMINS

12 *Petitioner*

13 v.

14 AMANDA LOLLAR

15 *Respondent*

) Case No. BS143169
)
) PETITIONER'S REPLY TO
) RESPONDENT'S MOTION TO
) DEEM PLAINTIFF A VEXATIOUS
) LITIGANT; REQUEST FOR
) SANCTIONS CCP § 128.7;
) MEMORANDUM OF POINTS AND
) AUTHORITIES IN SUPPORT
) THEREOF
)
) Date: September 27, 2013
) Time: 8:30 a.m.
) Dept: 75

18
19 TO THE HONORABLE COURT, INTERESTED PARTIES AND ATTORNEYS
20 OF RECORD:

21 PLEASE TAKE NOTICE THAT on September 27, 2013 at 8:30 a.m. or as soon
22 thereafter as the matter may be heard, in Department 75 or another Department of the
23 above-captioned Court located at 111 N. Hill Street, Los Angeles, California 90012,
24 Petitioner Mary Cummins will and hereby does move the Court to deny any order
25 deeming Petitioner Cummins a vexatious litigant. Petitioner has never "filed
26 unmeritorious motions, pleadings, or other papers," and has never "engaged in other
27 tactics that are frivolous or solely intended to cause unnecessary delay." Petitioner has
28 the right to appeal case BS143169 based on the law and evidence. Petitioner was

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