

MARY CUMMINS
Debtor
645 W. 9th St. #110-140
Los Angeles, CA 90015
In Pro Per
Telephone: (310) 877-4770
Email: mmmaryinla@aol.com

UNITED STATES BANKRUPTCY COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA

In re:)	Case No. 2:17-bk-24993-RK
MARY CUMMINS-COBB,)	Chapter 7
)	Adv. Proc. No. 2:18-ap-01066-RK
Debtor)	DEFENDANT'S REPLY TO
)	PLAINTIFF'S APPLICATION FOR
KONSTANTIN KHIONIDI, as Trustee)	ORDER SETTING HEARING ON
Of the COBBS TRUST,)	SHORTENED NOTICE
)	Judge: Honorable Robert N. Kwan
Plaintiff,)	Courtroom: 1675
vs.)	Edward R. Roybal Federal Building
MARY CUMMINS-COBB)	255 E. Temple St, Suite 1682
)	Los Angeles, CA 90012
Defendant.)	

INTRODUCTION

Defendant comes now and replies to Plaintiff's October 31, 2018 Application for order setting hearing on shortened notice. Plaintiff was again untruthful with the Court. Defendant OPPOSES continuing discovery to any date (Defendant Mary Cummins Declaration). Discovery was over October 31, 2018. Defendant previously agreed to continue discovery only if Defendant could depose ex/current(?) Plaintiff Amanda

**DEFENDANT'S REPLY TO PLAINTIFF'S APPLICATION FOR ORDER SETTING HEARING ON
SHORTENED NOTICE**

1 Lollar while Lollar is in Los Angeles, California for Defendant's deposition. Plaintiff
2 refused.

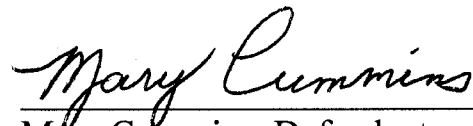
3 Plaintiff started discovery two months after the beginning of discovery. Defendant
4 responded to Plaintiff's interrogatories and discovery. Plaintiff on the other hand did
5 not reply to any of Defendant's interrogatories or requests for documents.

6 Plaintiff has included select parts of email conversations in Plaintiff's pleadings.
7 They are misleading. Defendant only had ten minutes to write Defendant's previous
8 reply to Plaintiff's request to extend discovery because Defendant had to immediately
9 file the document. There was not enough time to reply to the email exchanges
10 included. There is also not enough time today to reply to the emails. Defendant had 20
11 minutes to write this filing so Defendant can get to the courthouse and file the
12 document today. Defendant would gladly reply to the emails if requested.

13 **CONCLUSION**

14 Defendant requests that discovery not be continued. Plaintiff had four months for
15 discovery and didn't start until after two months. Plaintiff should have started earlier.

16 Respectfully submitted,

17
18 

19

Mary Cummins, Defendant


20 Dated: November 1, 2018

DECLARATION OF MARY CUMMINS

I, MARY CUMINNS, declare as follows:

1. Everything in my reply to Plaintiff's application for order setting hearing on shortened noticed was written by me.
2. Everything in my reply is the absolute truth.
3. I oppose continuing discovery. I oppose Plaintiff's application for order setting hearing on shortened notice.
4. I, declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 1, 2018 at Los Angeles, California.

By: 

MARY CUMMINS

1 PROOF OF SERVICE

2 (FRCivP 5 (b)) or

3 (CCP 1013a, 2015.5) or

4 (FRAP 25 (d))

5
6 I am Plaintiff in pro per whose address is 645 W. 9th St. #110-140, Los Angeles,
7 California 90015-1640. I am over the age of eighteen years.

8
9 I further declare that on the date hereof I served a copy of:

10
11 **DEFENDANT'S REPLY TO PLAINTIFF'S APPLICATION FOR ORDER
12 SETTING HEARING ON SHORTENED NOTICE**

13 on the following interested parties by email this document to the following.

14 Philip H. Stillman
15 Stillman & Associates
16 Miami, Florida
17 pstillman@stillmanassociates.com

mins

18 I declare under penalty of perjury, under the laws of the State of California, that the
19 foregoing is true and correct.

20 Executed this day, November 1, 2018, at Los Angeles, California.

21 Respectfully submitted,

22
23 *Mary Cummins*

24
25 Mary Cummins, Plaintiff
26 Dated: November 1, 2018
27 645 W. 9th St. #110-140
28 Los Angeles, CA 90015