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5 Attorneys for plaintiff KONSTANTIN KHIONIDI, as Trustee of the  
COBBS TRUST  
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7 **UNITED STATES BANKRUPTCY COURT FOR THE**  
8 **CENTRAL DISTRICT OF CALIFORNIA**

9 In re:  
10 MARY CUMMINS-COBB,  
Debtor

11 \_\_\_\_\_  
12 KONSTANTIN KHIONIDI, as Trustee of the  
COBBS TRUST,

13 Plaintiff,  
14 vs.

15 MARY CUMMINS-COBB,  
Defendant.  
16 \_\_\_\_\_

) Case No. 2:17-bk-24993-RK

) Chapter 7

) Adv. Proc. No. 2:18-ap-01066-RK

) REPLY MEMORANDUM IN SUPPORT OF  
PLAINTIFF'S MOTION FOR AN ORDER  
AMENDING SCHEDULING ORDER TO  
CONTINUE DISCOVERY CUTOFF AND  
PRETRIAL CONFERENCE

) Date: November 27, 2018  
Time: 2:30 p.m.

17 Judge: Honorable Robert N. Kwan  
18 Courtroom: 1675  
Edward R. Roybal Federal Building  
19 255 E. Temple Street, Suite 1682  
Los Angeles, CA 90012  
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1 As discussed in the Motion, the Scheduling Order in this case was only entered on June  
2 29. The amendment to the Scheduling Order is necessary in order to give Khionidi the time  
3 needed to force the Debtor and Defendant Mary Cummins-Cobb to (1) fully respond to the  
4 discovery and produce all requested documents timely propounded *on August 27, 2018*, (2)  
5 attend her deposition, which Cummins simply refused to do with no basis, (3) obtain the  
6 deposition of Cummins' roommate, who Cummins appears to have fraudulently listed as a  
7 secured creditor, and (4) take any limited follow-up discovery if required, based on the  
8 documents ultimately obtained and Cummins' deposition. That will also allow for the preparation  
9 of a meaningful and complete Pretrial Order.

10 As this Court can perhaps tell from the tone of Cummins' Opposition as well as the tone of  
11 her emails, dealing with Cummins, a *pro per* defendant, has been a challenge. She has outright  
12 refused to provide *substantive* answers to interrogatories, has refused to produce any documents  
13 – continually referring to alleged production of documents in other cases but not this one, has  
14 refused to meet and confer on her discovery responses, failed to appear without excuse for her  
15 deposition, refused to provide alternate dates for her deposition after refusing to appear, routinely  
16 calls Plaintiff's counsel a "liar," repeatedly claims without basis that Plaintiff's counsel is "lying,"  
17 and has refused to cooperate in the preparation of Joint Stipulations pursuant to LBR 7026-1 to  
18 delay Plaintiff from filing motions to compel further discovery responses.<sup>1</sup> After all of that,  
19 Cummins now has the temerity to claim that Plaintiff's motion is untimely and that Plaintiff should  
20 have propounded discovery a month earlier. Having been the cause for all delays, Cummins  
21 should be estopped from opposing the Motion at all.

22 Plaintiff's counsel has learned that this is not the first time that Cummins has posed  
23 challenges. After a trial against Cummins for defamation in Texas, the Court held: "I think the  
24 plaintiff has clearly proven that a defamation in this case was *egregious* as well as *malicious* as

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25  
26 <sup>1</sup> All of the communications between Cummins and Plaintiff's counsel are in writing so that  
27 there would be a written record of exactly what was said. Cummins' many statements in her  
28 Opposition are unsupported by any evidence and she has not submitted even one email to support  
any of the accusations leveled at Mr. Stillman. Accordingly, Plaintiff objects to all of Cummins'  
unsupported and purported statements of "fact" in her Opposition. See LBR 9013-1(i).

1 well as *intentional*.<sup>2</sup> See June 14, 2012 Trial Transcript, 4:8-11, attached to the Stillman  
2 Declaration filed on November 6 as Exhibit 3. Based thereon, the Texas Court awarded \$3  
3 million in damages on the defamation claim and \$3 million in exemplary damages. A copy of the  
4 Texas Judgment is attached to the Stillman Declaration as Exhibit 4. She has been sanctioned  
5 for posting comments in “blogs” about judges who ruled against her in cases. Stillman Reply  
6 Declaration, Exhibit 1. Cummins had a complaint in the Central District of California dismissed as  
7 a bad faith filing in *Cummins v. Lollar*, Case No. 12-4902-GHK (MRWx) (C.D.Cal. August 8,  
8 2012). Cummins filed motions for protective orders in Los Angeles in connection with the  
9 enforcement of the domesticated Texas judgment in order to avoid producing documents, that  
10 were denied, see Stillman Reply Decl., Exhibit 2. Cummins failed to appear for her judgment  
11 debtor’s exam and caused a bench warrant to be issued for her arrest. Stillman Decl. filed on  
12 November 6, Exhibit 13. Cummins also contends that she produced all responsive documents in  
13 connection with the Judgment Debtor’s Examination. However, attached the Stillman Reply Decl.  
14 as Exhibit 3 is the sum total of the documents produced – her driver’s license, a copy of her real  
15 estate appraiser’s license, and an insurance declaration page. That is it. This Court should view  
16 her Opposition through the historical lense of her prior litigation conduct.

17 In contrast, Plaintiff’s counsel has tried to work with Cummins, explain her obligations  
18 regarding discovery, offered to stipulate to a protective order on specific documents such as tax  
19 returns,<sup>3</sup> and has tried to treat Cummins with consideration and in recognition of her *pro per*  
20 status. Plaintiff’s counsel has been repaid with insults, outright misrepresentations, and the

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21  
22 <sup>2</sup> Cummins bizarrely states in her Opposition, p. 5 that the underlying judgment in the Texas  
23 case does not mention “defamation,” or “malice.”

24 <sup>3</sup> In what can only be called a flat-out misrepresentation to this Court, Cummins contends  
25 that Plaintiff’s counsel refused to agree to a protective order regarding her tax returns. Opposition,  
26 p. 5 (“Plaintiff did not try to negotiate a protective order. Defendant requested that Defendant’s tax  
27 return be under a protective order. Plaintiff flat out refused stating all tax returns and financial  
28 documents are always public in bankruptcy cases.”). Yet, in Mr. Stillman’s email dated October 12  
and attached to the Stillman Declaration filed on November 6 as Exhibit 1, Mr. Stillman states “But  
as I said, I can agree to a PO on a category by category basis. For example, you were concerned  
about the tax returns. I agreed to a PO regarding the tax returns because it was limited and  
focused.”

1 apparently ubiquitous negative “blog” posts for which she was apparently sanctioned in Texas.

2 Apart from the problematic conduct of the debtor and defendant Mary Cummins-Cobb,  
3 and unrelated to her abject refusal to cooperate in discovery, Plaintiff alternatively requests that  
4 the December 11 Pretrial Conference be continued for to January 8, 2019, as Plaintiff’s counsel  
5 will be out of the country from December 11 through December 21 and requires the additional  
6 time to have motions to compel discovery heard prior to the preparation of the Pretrial Order.

7 **ARGUMENT**

8 **I.**

9 **PLAINTIFF HAS DEMONSTRATED GOOD CAUSE FOR THE REQUESTED AMENDMENT OF**  
10 **THE SCHEDULING ORDER**

11 But for Cummins’ conduct, no amendment to the Scheduling Order would be necessary.  
12 Would a motion to amend the Scheduling Order have been necessary if Cummins timely and  
13 fully responded to the timely-served written discovery? No. Would this Motion have been needed  
14 if Cummins had appeared for her deposition? No. Would this Motion have been needed had  
15 Cummins not interfered with her roommate’s (and alleged secured creditor) deposition? No.  
16 Stripped of rhetoric and false statements in her Opposition, Cummins’ conduct has made this  
17 Motion necessary and Cummins is certainly not the one to object. Her Opposition can be refuted  
18 as follows.

19 A. **Cummins’ Claim That Discovery Was Not Propounded Timely Is False.**

20 1. **Written Discovery Was Timely Propounded Well In Advance Of The Cutoff.**

21 The Scheduling Order was entered on June 29, 2018. Plaintiff’s counsel was in France on  
22 vacation during most of the month of July. Plaintiff reviewed the files and diligently prepared and  
23 propounded one set of interrogatories and document requests to Cummins on August 27, only  
24 two months after this Court entered the Scheduling Order in this case. Responses were due on  
25 September 26. Cummins served responses on September 28 – two days late, and failed to state  
26 the discovery request before each nonresponsive answer.

27 As but one example of the type of non-responsive discovery, Plaintiff asked Cummins to  
28 state all facts on which she relied in contending that plaintiff Khionidi was not the proper assignee

1 of the Texas Defamation Judgment – something she stated to this Court in opposition to  
2 Plaintiff’s Motion for Judgment on the Pleadings. Interrogatory No. 9 stated:

3 State all facts on which YOU rely in contending that the assignment of the  
4 California judgment to Konstantin Khionidi, as Trustee of the Cobbs Trust, is invalid.

5 RESPONSE:

6 The judgment is void. The Judge did not sign an oath of office after being  
7 assigned the case as a visiting Judge. Judge Brigham had no jurisdiction over the  
8 case. The Judgment was also obtained by the use of a Texas visiting Judge which is  
9 unconstitutional. Plaintiff did not state what they felt was defamatory before or during  
10 the trial. Plaintiff did not show even one element of defamation. Plaintiff never stated  
11 who made, wrote or posted any articles or comments. Plaintiff did not show any  
evidence for any financial damages. Plaintiff Lollar stated pre-trial that Plaintiff Lollar  
would not seek any financial award for damages of any type. Plaintiff stated that as  
Plaintiff did not want to have to show her tax returns or bank statements. I re-allege  
everything stated in the appeal of the judgment and motion for new trial which your  
client has and is public. Plaintiff has unclean hands. Plaintiff made false statements,  
forged documents and committed perjury.

12 Aside from the fact that Cummins refers to Ms. Lollar as the “plaintiff” in this case, even  
13 though she was the plaintiff in the Texas case, this is the type of nonresponsive answer Khionidi  
14 received to all of the interrogatories. Similarly, Cummins either contended that documents had  
15 been produced in other cases, which is not only irrelevant but is false. See Stillman Reply  
16 Declaration, Exhibit 3, which is what Plaintiff understands was the full production of documents in  
17 connection with a Debtor’s Examination after the Texas Defamation Judgment was domesticated  
18 in California.

19 “Complete and accurate responses to discovery are required for the proper functioning of  
20 our justice system... [and] parties have a duty to provide true, explicit, responsive, complete and  
21 candid answers to discovery [.]” *Brady v. Grendene USA, Inc.*, 2014 U.S. Dist. LEXIS 136558, at  
22 8 (S.D. Cal. Sep. 26, 2014). Had Cummins properly responded to the written discovery as she is  
23 obligated to do by the Federal Rules of Civil Procedure, and which discovery was due over a  
24 month prior to the October 31 discovery cutoff (and only three months after entry of the  
25 Scheduling Order), there would have been no need to amend the Scheduling Order.

26 **2. Cummins Deposition Was Timely Noticed.**

27 Cummins also claims that the Scheduling Order should not be amended to permit Plaintiff  
28 to take her deposition because her deposition was not timely noticed for October 26. Plaintiff had

1 assumed – wrongly as it turned out – that consistent with Cummins’ duties as the debtor and  
2 consistent with her obligations under the Fed. R. Civ. P., complete or largely complete responses  
3 to the written discovery would have been timely received in September 2018, enabling a  
4 productive deposition in October.

5         When it became clear that Cummins would not confer on her inadequate discovery  
6 responses, produce any documents or provide dates for her deposition, and despite not having  
7 the benefit of proper discovery responses, Plaintiff served Notice of Taking Deposition on  
8 October 12. Fed. R. Civ. P. 30(b)(1) only requires “reasonable notice.” Courts have found  
9 approximately ten days’ notice generally is considered “reasonable notice.” *See Mason v. Silva*,  
10 2013 U.S. Dist. LEXIS 74801 (S.D. Cal. May 28, 2013). Cummins received *fourteen* days notice.  
11 Despite the timely notice (no documents were requested), Cummins refused to appear for her  
12 deposition, and refused to provide any other dates for her deposition. Thus *her* deposition was  
13 timely, properly served, and she simply refused to appear – apparently assuming that if she  
14 delayed until after the October 31 discovery cutoff, she would not be forced to submit to a  
15 deposition.

16         Absent a protective order or an order staying the deposition, a party is required to appear  
17 for a properly noticed deposition. *Anderson v. Air West, Inc.*, 542 F.2d 1090, 1093 (9<sup>th</sup> Cir. 1976);  
18 *Pioche Mines Consolidated, Inc. v. Dolman*, 333 F.2d 257, 269 (9<sup>th</sup> Cir. 1964). Fed. R. Civ. P.  
19 37(d) provides that the failure of a party to appear for deposition may result in the imposition of  
20 sanctions under Rule 37(b)(2)(A), (B) or (C). In *Koninklijke Philips Elecs. N.V. v. KXD Tech., Inc.*,  
21 2007 U.S. Dist. LEXIS 100969, at 49 (D. Nev. Oct. 2, 2007), citing *Abiola v. Abubaker*, 2007 U.S.  
22 Dist. LEXIS 20311, 2007 WL 898197 (N.D. Ill. 2007), the court stated that “it is incumbent on the  
23 party whose deposition is noticed to move for a protective order. The noticed party does not have  
24 the option of sitting back, failing to appear, requiring the noticing party to take action, and then  
25 crying foul to the court.” Yet, that is exactly what Cummins did – simply refused to appear,  
26 refused to provide other dates, and is now crying foul.

27         Cummins’ deposition was timely noticed and Plaintiff was prevented from obtaining her  
28 testimony.

1           3.       **Third Party Jennifer Charnofsky's Deposition Was Timely Noticed.**

2           The last deposition Plaintiff sought was of third party Jennifer Charnofsky, who, according  
3 to Cummins' bankruptcy schedules, supposedly has a secured interest on Cummins' car – which  
4 turns out is *not* Cummins' car, and on which there is no record of a security interest. Charnofsky  
5 is therefore a directly relevant witness to Plaintiff's § 727 claim to establish Cummins' false  
6 statements in her Schedules.

7           As set forth in Plaintiff's Motion, Cummins apparently resides with Ms. Charnofsky. Given  
8 that Cummins failed to produce any documents relating to her statement in her Schedule A/B that  
9 Charnofsky had a security interest on Cummins' car – which turned out to be owned by  
10 Cummins' alter ego, Animal Advocates, Plaintiff served Cummins with notice of Charnofsky's  
11 deposition on October 15 and for Charnofsky's deposition on October 30 – 15 days notice, again  
12 more than "reasonable notice" and within the discovery cutoff.

13           Since Cummins lives with Charnofsky and the Toyota Prius was spotted in Charnofsky's  
14 driveway, it is safe to assume that Charnofsky had notice of her deposition on October 15.  
15 However, after avoiding service, Charnofsky was served on October 20 – still ten days prior to  
16 the deposition and again, "reasonable notice" as a matter of law. Inexplicably, Cummins  
17 contends in her Opposition that the subpoena to Charnofsky was invalid because Charnofsky  
18 was entitled to 20 days notice, but provides no citation to any case or rule that requires 20 days  
19 notice to a non-party deponent.

20           Thus, the Charnofsky deposition was timely noticed prior to the discovery cutoff, and was  
21 thwarted by Cummins. In fact, Charnofsky did not once contact Plaintiff's counsel to confer  
22 regarding the subpoena served on her. Although Cummins appears to think that she can simply  
23 stall, delay, fail to appear and encourage others not to appear for their depositions, until after the  
24 discovery cutoff, in which case she believes that she is "home free" and can deprive Plaintiff of  
25 obtaining *any* discovery, that is the antithesis of obligations of good faith and cooperation that are  
26 (or at least should be) the hallmark of discovery.

27 B.       Plaintiff's Motion to Amend The Scheduling Order Is Also Timely.

28           Cummins further contends in her Opposition that Plaintiff's Motion to Amend the

1 Scheduling Order is untimely as it was filed after the discovery cutoff. Although there is no  
2 prohibition against filing a motion to amend a Scheduling Order after the discovery cutoff and  
3 Cummins cites nothing to support her contention, that is simply not the case.

4 First, any delay in filing the Motion was solely due to Cummins' own chicanery. As  
5 recounted in Plaintiff's Motion and in the emails attached to the Stillman Declaration filed in  
6 support thereof, after Cummins failed to comply with her discovery obligations, Plaintiff's counsel  
7 patiently met and conferred with her – in fact, repeatedly. After conferring, she agreed to  
8 stipulate to extend the discovery cutoff on October 12. After agreeing, she said that she had to  
9 review the Stipulation “over the weekend.” The following Tuesday, she requested a protective  
10 order over *all* discovery (but never explicitly tied that request to the stipulation to extend the  
11 discovery cutoff). Finally, after numerous emails asking Cummins whether she would execute  
12 the stipulation, she explicitly tied this broad and improper protective order demand to executing  
13 the stipulation on October 19. Then, she insisted that the stipulation require that the Texas  
14 original judgment creditor, Amanda Lollar be deposed *in Los Angeles* and prior to Cummins  
15 being deposed. At that point, it became clear that Cummins was simply engaging in a delaying  
16 game, since she knew for a fact that she could not compel Ms. Lollar to be deposed in Los  
17 Angeles.

18 On October 22, Plaintiff thereupon filed a “partially unopposed ex parte application”  
19 seeking to extend the discovery cutoff and Pretrial Conference dates *as Cummins had agreed* on  
20 October 12. When this Court took no action on that Application, Plaintiff re-filed it as with an  
21 order shortening time on October 31. When the Court denied the Order shortening time on the  
22 ground that the Motion could be heard on regular notice, Plaintiff refiled it on November 6 as the  
23 current noticed motion. Accordingly, since October 22, Plaintiff has been seeking an order  
24 amending the Scheduling Order.

25 D. Cummins Continues To Refuse To Cooperate Even to Get Discovery Motions Before This  
26 Court.

27 In addition to all of the foregoing, Plaintiff's counsel has tried to confer with Cummins to  
28 attempt to resolve or narrow the discovery disputes. After being advised that she had seven

1 days to confer on discovery, she refused to confer on the written discovery, stating that it was  
2 past the discovery cutoff. Stillman Reply Decl., ¶ 2. Plaintiff's counsel then served Cummins  
3 with a Joint Stipulation required by LBR 7026-1, which she refused to complete. Stillman Reply  
4 Decl., ¶ 3. Thus, Cummins is even delaying Plaintiff's efforts to prepare a Motion to Compel  
5 further responses to the written discovery at this time. Plaintiff must now prepare the motions  
6 without her cooperation, must move to compel her deposition, and must move to compel the  
7 deposition of Jennifer Charnofsky – all creating more delay solely to prejudice Plaintiff's ability to  
8 prepare his case.

9 E. Cummins' Discovery Misconduct To Hinder And Delay Plaintiff's Timely Completion Of His  
10 Discovery Prior To The Existing Discovery Cutoff Constitutes "Good Cause" For Amending  
11 The Scheduling Order.

12 Discovery should be completed in this case for an orderly resolution of all issues in this  
13 case. See *T. Dorfman, Inc. v. Melaleuca, Inc.*, 2013 U.S. Dist. LEXIS 150469, at 9 (D. Idaho Oct.  
14 18, 2013)(good cause shown by late production of discovery). Resolution of discovery disputes  
15 also constitutes "good cause" to amend a Scheduling Order. *Brady v. Grendene USA, Inc.*, 2014  
16 U.S. Dist. LEXIS 136558, at 36 (S.D. Cal. Sep. 26, 2014)("there is good cause to amend this  
17 Court's Scheduling Order to permit the parties to complete depositions and any necessary  
18 follow-up discovery"). Unfortunately, Plaintiff will need the assistance of this Court to obtain the  
19 discovery to which he is entitled.

20 F. There Is No Prejudice.

21 Cummins contends her Opposition that she will be prejudiced by an amendment of the  
22 Scheduling Order, but does not explain how. Having to respond to discovery that she has so far  
23 evaded is *not* legally cognizable prejudice. On the other hand, Plaintiff will be severely  
24 prejudiced if the Scheduling Order is not amended. First, no trial date has been set in this case,  
25 and therefore an amendment of the Scheduling Order – which has only been issued four months  
26 ago – will not interfere with any trial date. Second, Plaintiff has already flushed out one  
27 falsehood contained in Cummins' Schedules through his Motion to Amend the Scheduling Order,  
28 since Cummins has now admitted that the car that she listed as her own is not really hers, and

1 therefore Charnofsky is not a secured creditor as Cummins claims. Additionally, the dispute  
2 surrounding the vehicle conceals an even larger issue – that Cummins is using property of a non-  
3 profit corporation for her own personal gain, and has taken thousands of dollars from the non-  
4 profit for her personal use, such as paying litigation costs in the Texas case. Plaintiff must be  
5 given the opportunity to develop this evidence, which is directly relevant to Plaintiff's § 727  
6 Objection to Discharge.

7 **II.**

8 **CUMMINS DOES NOT ADDRESS PLAINTIFF'S COUNSEL'S SEPARATE REQUEST TO**  
9 **CONTINUE THE PRETRIAL CONFERENCE**

10 As discussed in Plaintiff's Motion, Plaintiff's counsel has a prepaid vacation out of the  
11 country from December 11 through December 21, and regardless of the Court's ruling on the  
12 amendment of the Scheduling Order, Plaintiff's counsel requested that the Pretrial Conference  
13 be continued to January 8, 2019, in order to give the parties time to prepare the necessary draf  
14 Order for the Pretrial Conference. Given Plaintiff's historical experience in attempting to work  
15 with Cummins, Plaintiff anticipates that preparing that Order will also be a time-consuming  
16 process. Because the Pretrial Conference obviously serves an important purpose in narrowing  
17 the issues for trial, adequate time to prepare is important. Moreover, Plaintiff anticipates filing a  
18 Motion for Summary Judgment after obtaining the discovery from Cummins. Those factors,  
19 coupled with the fact that Plaintiff's counsel will be out of the country on December 11,  
20 constitutes good cause for at least continuing the date of the Pretrial Conference and Cummins  
21 has failed to articulate any reason at all for opposing this more narrow request.

22 **CONCLUSION**

23 For the foregoing reasons, Plaintiff Konstantin Khionidi, as Trustee of the Cobbs Trust  
24 hereby requests that this Court enter an Order (1) extending the discovery cutoff from October  
25 31, 2018 through January 31, 2019 and (2) continue the Pretrial Conference from December 11  
26 to March 12, 2019. In light of the circumstances in this case, Plaintiff believes that the extension  
27 should only apply to Plaintiff's discovery, considering that the need for such relief was caused by  
28 the Debtor. Alternatively, Plaintiff requests that this Court at least continue the Pretrial

1 Conference to January 8, 2019 or later.

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Respectfully Submitted,

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STILLMAN & ASSOCIATES

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5 Dated: November 20, 2018

By: \_\_\_\_\_

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Philip H. Stillman, Esq.  
*Attorneys for KONSTANTIN KHIONIDI, as Trustee of  
the COBBS TRUST*

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Stillman & Associates  
3015 North Bay Road, Suite B  
Miami Beach, Florida 33140

A true and correct copy of the foregoing document entitled (*specify*):

### **PLAINTIFF'S REPLY IN SUPPORT OF HIS MOTION TO AMEND SCHEDULING ORDER TO EXTEND THE DISCOVERY CUTOFF AND PRETRIAL CONFERENCE; REPLY DECLARATION OF PHILIP STILLMAN**

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On \_\_\_\_\_, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

### 2. **SERVED BY UNITED STATES MAIL:**

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) November 20, 2018, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Defendant Mary Cummins-Cobb, *in pro per*, mmmarycummins@gmail.com (via email by agreement)

Hon. Robert Kwan  
US Bankruptcy Court, Central District of California, Room 303  
255 E. Temple Street, Suite 1682  
Los Angeles, CA 90012

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

11/20/2018 <i>Date</i>	Philip H. Stillman <i>Printed Name</i>	/s/ Philip H. Stillman <i>Signature</i>
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