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7 Attorneys for plaintiff KONSTANTIN KHIONIDI, as Trustee of the  
8 COBBS TRUST

9 **UNITED STATES BANKRUPTCY COURT FOR THE**  
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 In re:  
12 MARY CUMMINS-COBB,  
13 Debtor

14 KONSTANTIN KHIONIDI, as Trustee of the  
15 COBBS TRUST,

16 vs. Plaintiff,

17 MARY CUMMINS-COBB,  
18 Defendant.

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

) Chapter 7

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

) EVIDENTIARY OBJECTIONS TO THE  
DECLARATION OF MARY CUMMINS

) Date: November 26, 2019

) Time: 2:30 p.m.

) Judge: Honorable Robert N. Kwan

) Courtroom: 1675

) Edward R. Roybal Federal Building  
255 E. Temple Street, Suite 1682  
Los Angeles, CA 90012

1 Plaintiff Konstantin Khionidi, as Trustee of the Cobbs Trust dated March 20, 2017, hereby  
2 objects to the Declaration of Mary Cummins as follows:

3 Para. 1:

4 Cummins' blanket statement that she has personal knowledge of facts stated in the  
5 declaration is a legal conclusion unsupported by any facts and therefore lacks foundation.

6 Para. 2:

7 Cummins' statement that "Everything in my DEFENDANT'S MOTION FOR SUMMARY  
8 JUDGMENT was written by me and is the truth to the best of my knowledge" lacks foundation, is  
9 compound and fails to adequately identify which of the many statements and legal conclusions in  
10 her Motion are "truth to the best of my knowledge" and which statements are factually supported  
11 showing or tending to show their truth, and which would be improper hearsay.

12 Para. 3:

13 Cummins attaches one exhibit to her Declaration – an official transcript of one proceeding.  
14 Although she references other exhibits in her Motion, none are attached to her motion or her  
15 declaration and therefore this paragraph lacks foundation, is hearsay.

16 Respectfully Submitted,

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STILLMAN & ASSOCIATES

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Dated: November 5, 2019

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

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

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