

1 MARY CUMMINS  
2 Debtor, Defendant, In Pro Per  
3 645 W. 9th St. #110-140  
4 Los Angeles, CA 90015  
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8 UNITED STATES BANKRUPTCY COURT FOR THE  
9 CENTRAL DISTRICT OF CALIFORNIA

10 In re:	}	Case No. 2:17-bk-24993-RK
11 MARY CUMMINS-COBB,	}	Chapter 7
12	}	Adv. Proc. No. 2:18-ap-01066-RK
13 Debtor	}	BAP No.: CC-20-1033
14	}	2:20-cv-02149-AB
15 <hr style="border-top: 1px solid black;"/> KONSTANTIN KHIONIDI v	}	DEFENDANT’S REPLY TO
16 MARY CUMMINS-COBB	}	PLAINTIFF’S REQUEST FOR
	}	DISMISSAL

17 Defendant just received Appellee’s Response to this Court’s OSC to Appellant and  
18 Request to Dismiss Appeal for Lack of Prosecution. Defendant is replying to that  
19 document Doc# 62.

20 Defendant received the Court’s order allowing Defendant to file docs online May  
21 12, 2020. It took over five days to get access to the menu because of technical issues.  
22 Defendant had multiple emails with ecf help. Defendant first requested to file  
23 electronically March 16, 2020. When no response was received Defendant called the  
24 Court who stated it was not received. Defendant was instructed to file another form.  
25 Defendant filed another form in the mail and online. That caused there to be two  
26 accounts. Ecf finally figured this out and reset the accounts a week ago.  
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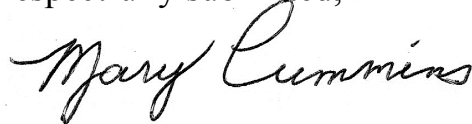
1 Since that time Defendant has been extremely physically ill and unable to finish  
2 Defendant's Motion to Reinstate Appeal. Defendant will file that document along with  
3 other needed documents by this Friday May 29, 2020.

4 Again, Defendant never defamed Plaintiff. Plaintiff has unclean hands. Immediately  
5 after the order Plaintiff filed an identical copy/paste complaint. That complaint was  
6 just dismissed because Plaintiff forged their exhibits and filed perjured affidavits  
7 stating the exhibits were true and correct copies of the originals which still exist online.  
8 That was false. Plaintiff forged the exhibits because Defendant never defamed  
9 Plaintiff. Defendant is working with authorities to have Plaintiff prosecuted for  
10 forgery, perjury and fraud.

11 The current Plaintiff Konstantin Khionidi is a straw person who does not exist.  
12 Plaintiff Amanda Lollar bragged to Defendant that Khionidi does not exist. The  
13 purpose was to make discovery impossible. The underlying trust agreement shows that  
14 Plaintiff Amanda Lollar is still the Plaintiff and in control of the judgment. Plaintiff  
15 swore they'd file a notarized document transferring the judgement back to Lollar.  
16 Plaintiff never did this because Plaintiff Khionidi does not exist. For all these reasons  
17 and more the judgment is dischargeable.

18 Defendant will be filing this with the District Court in the Appeal, the bankruptcy  
19 court for the Adversary Proceeding and the main bankruptcy case.  
20

21 Respectfully submitted,

22 

23 \_\_\_\_\_  
24 Mary Cummins, Defendant

25 Dated: May 26, 2020  
26  
27  
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**DECLARATION OF DEFENDANT MARY CUMMINS**

I, MARY CUMMINS, declare as follows:

1. I am Mary Cummins Defendant in pro per. I make this declaration on my personal knowledge of the facts set forth herein.
2. Everything in DEFENDANT’S REPLY was written by me and is the truth to the best of my knowledge.
3. All exhibits cited, footnoted, attached are true and correct copies of the originals.

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

Executed on May 26, 2020 at Los Angeles, California.

By: 

MARY CUMMINS

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PROOF OF SERVICE  
(FRCivP 5 (b)) or  
(CCP 1013a, 2015.5) or  
(FRAP 25 (d))

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

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

REPLY

on the following interested parties by email to the following at .

Philip H. Stillman  
Stillman & Associates  
pstillman@stillmanassociates.com

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

Executed this day, May 26, 2020, at Los Angeles, California.

Respectfully submitted,



Mary Cummins, Defendan  
645 W. 9th St. #110-140  
Los Angeles, CA 90015