

MARY CUMMINS
Appellant In Pro Per
645 W. 9th St. #110-140
Los Angeles, CA 90015
Direct: (310) 877-4770
Fax: (310) 494-9395
Email: mmmaryinla@aol.com

COURT OF APPEALS
SECOND APPELLATE DISTRICT

MARY CUMMINS

Appellant

v.

AMANDA LOLLAR

Appellee

) Case No. B251854

) MOTION FOR SANCTIONS CCP
) §128.5(a), §128.7(b)

Appellant Mary Cummins ("Cummins") moves this Court to sanction Appellee and their attorney Dean Rocco under §128.5(a), §128.7(b)(2), and will show the court the following:

I. INTRODUCTION

May 2, 2014 Appellant Pro Se Cummins timely filed Appellant's opening brief. Appellee had until May 3, 2014 to respond. May 2, 2014 Appellee asked for a 60 day extension. Appellee stated the only purpose of the extension was because this case involved complex issues of law which would take more time. No other reason was given. Appellee clearly stated the purpose was not to delay or harass. Court granted the extension. Appellee's reply brief was due July 3, 2014.

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