

MARY CUMMINS
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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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This book reveals the people behind the statistics looking closely at how people get to the point of serious financial distress the hardships of dealing with overwhelming debt and the difficulty of righting one's financial life In telling the stories of financial failures this book exposes an all too real part of middle class life that is often lost in the success stories that dominate the American economic narrative Authored by experts in several disciplines including economics law political science psychology and sociology *Broke* presents analyses from an original proprietary data set of unprecedented scope and detail the 2007 Consumer Bankruptcy Project Topics include class status home ownership educational attainment impacts of self employment gender differences economic security and the emotional costs of bankruptcy The book makes judicious use of illustrations to present key findings and concludes with a discussion of the implications of the data for contemporary policy debates

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Table of Contents Sample Court Papers

1. Understanding the eBook Sample Court Papers
 - The Rise of Digital Reading Sample Court Papers
 - Advantages of eBooks Over Traditional Books
2. Identifying Sample Court Papers
 - Exploring Different Genres
 - Considering Fiction vs. Non-Fiction
 - Determining Your Reading Goals
3. Choosing the Right eBook Platform
 - Popular eBook Platforms
 - Features to Look for in an Sample Court Papers
 - User-Friendly Interface
4. Exploring eBook Recommendations from Sample Court Papers
 - Personalized Recommendations
 - Sample Court Papers User Reviews and Ratings
 - Sample Court Papers and Bestseller Lists
5. Accessing Sample Court Papers Free and Paid eBooks
 - Sample Court Papers Public Domain eBooks
 - Sample Court Papers eBook Subscription Services
 - Sample Court Papers Budget-Friendly Options
6. Navigating Sample Court Papers eBook Formats

- ePub, PDF, MOBI, and More
- Sample Court Papers Compatibility with Devices
- Sample Court Papers Enhanced eBook Features
- 7. Enhancing Your Reading Experience
 - Adjustable Fonts and Text Sizes of Sample Court Papers
 - Highlighting and Note-Taking Sample Court Papers
 - Interactive Elements Sample Court Papers
- 8. Staying Engaged with Sample Court Papers
 - Joining Online Reading Communities
 - Participating in Virtual Book Clubs
 - Following Authors and Publishers Sample Court Papers
- 9. Balancing eBooks and Physical Books Sample Court Papers
 - Benefits of a Digital Library
 - Creating a Diverse Reading Collection Sample Court Papers
- 10. Overcoming Reading Challenges
 - Dealing with Digital Eye Strain
 - Minimizing Distractions
 - Managing Screen Time
- 11. Cultivating a Reading Routine Sample Court Papers
 - Setting Reading Goals Sample Court Papers
 - Carving Out Dedicated Reading Time
- 12. Sourcing Reliable Information of Sample Court Papers
 - Fact-Checking eBook Content of Sample Court Papers
 - Distinguishing Credible Sources
- 13. Promoting Lifelong Learning
 - Utilizing eBooks for Skill Development
 - Exploring Educational eBooks
- 14. Embracing eBook Trends
 - Integration of Multimedia Elements
 - Interactive and Gamified eBooks

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