4 MARY CUMMINS Appellant In Pro Per 22 645 W. 9th St. #110-140 3 Los Angeles, CA 90015 Direct: (310) 877-4770 Fax: (310) 494-9395 15 Email: mmmaryinla@aol.com 65 7 8 394 MARY CUMMINS 10 20.25 Appellant 1.2 3.3 AMANDA LOLLAR 3.46 Appellee 2.55 1.6 30.77 1.8

COURT OF APPEALS

#### SECOND APPELLATE DISTRICT

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

Case No. B251854

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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