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8 COURT OF APPEALS
9 SECOND APPELLATE DISTRICT

10 MARY CUMMINS

11 *Appellant*

12 v.

13 AMANDA LOLLAR

14 *Appellee*

) Case No. B251854

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

15
16
17 Appellant Mary Cummins ("Cummins") moves this Court to sanction Appellee and
18 their attorney Dean Rocco under §128.5(a), §128.7(b)(2) , and will show the court the
19 following:

20 **I. INTRODUCTION**

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

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