



1 MARY CUMMINS  
 2 Debtor, Defendant, In Pro Per  
 3 645 W. 9th St. #110-140  
 4 Los Angeles, CA 90015  
 5 Direct: (310) 877-4770  
 6 Fax: (310) 494-9395  
 7 Email: mmmmaryinla@aol.com

8 UNITED STATES BANKRUPTCY COURT FOR THE  
 9 CENTRAL DISTRICT OF CALIFORNIA

<p>10 In re:</p> <p>11 MARY CUMMINS-COBB,</p> <p>12</p> <p>13 Debtor</p> <hr/> <p>14 KONSTANTIN KHIONIDI, as Trustee</p> <p>15 Of the COBBS TRUST,</p> <p>16</p> <p>17 Plaintiff,</p> <p>18 vs.</p> <p>19 MARY CUMMINS-COBB</p> <p>20 Defendant.</p> <hr/> <p>21 Hearing:</p>	<p>) Case No. 2:17-bk-24993-RK</p> <p>) Chapter 7</p> <p>) Adv. Proc. No. 2:18-ap-01066-RK</p> <p>) DEFENDANT'S EX PARTE APPLICATION TO CONTINUE HEARING ON DEFENDANTS'S MOTION FOR SUMMARY JUDGMENT, STATUS CONFERENCE FROM NOVEMBER 26, 2019 TO DECEMBER 10, 2019</p> <p>) Judge: Honorable Robert N. Kwan Courtroom: 1675 Edward R. Roybal Federal Building 255 E. Temple St, Suite 1682 Los Angeles, CA 90012</p>
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23 Defendant Mary Cummins hereby requests that this Court continue the hearing on

24 Defendant's Motion for Summary Judgment scheduled for November 26, 2019 to

25 December 10, 2019. Defendant has had multiple computer crashes with Defendant's

26 only computer a ten year old notebook. Defendant expected to be able to reply to

27 Plaintiff's reply within the 14 days time period but was not able to get the computer

28 functional in time. The notebook is currently functional. Defendant conferred with

1 Plaintiff on November 15, 2019 at 2:45 p.m. to send a proposed stipulation to continue.  
2 Plaintiff rejected this stipulation (Declaration, Exhibit 1). Accordingly, this ex parte  
3 application was prepared based on the following.

4 Defendant requested a stipulation to continue from Plaintiff. Plaintiff refused.  
5 Accordingly good cause supports the brief continuance requested from November 29, 2019,  
6 2019 to December 10, 2019 with a concomitant extension of the due date for  
7 Defendant's reply.

8 **CONCLUSION**

9 For the foregoing reasons Defendant Mary Cummins hereby requests that this Court  
10 enter an Order (1) continuing the hearing on defendant's Motion for Summary  
11 Judgment and status conference from November 26, 2019 to December 10, 2019 and  
12 (2) continue the due date for Defendant's reply accordingly.  
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14 Respectfully submitted,

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17 Dated: November 20, 2019

18 Mary Cummins, Defendant pro se