

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: mmmaryinla@aol.com

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

10 In re:	}	Case No. 2:17-bk-24993-RK
11 MARY CUMMINS-COBB,	}	Chapter 7
12	}	Adv. Proc. No. 2:18-ap-01066-RK
13 Debtor	}	BAP No.: CC-20-1033
14	}	2:20-cv-02149-AB
15	}	DEFENDANT'S NOTICE OF OBJECTION TO DISCHARGE, CLOSING OF BANKRUPTCY CASE. NOTICE OF FILING OF REINSTATEMENT OF APPEAL OF DISCHARGE OF MAIN JUDGMENT.
16	}	
17	}	
18	}	
19	}	
20	}	

21 Defendant Mary Cummins files this notice with the Court to object to discharge of
22 debts and closing of the bankruptcy case unless it includes the discharge of the
23 approximate \$10,000,000 judgment now assigned to Konstantin Khionidi which is the
24 subject of the Adversary Proceeding. If for some reason the stated judgment is not
25 discharged, Defendant will file to dismiss the entire bankruptcy case. This judgment is
26 the main reason the bankruptcy case was filed.
27

28 ///

1 Defendant is filing a Motion to Reinstate the Appeal of the discharge of the
2 judgment in the Adversary Proceeding. Defendant does not agree to close the Adverse
3 Proceeding until the appeal has been heard. The judgment is dischargeable.

4 Please, file this court notice in the bankruptcy case. These motions are being mailed
5 as the Court is only allowing documents to be filed by mail or electronically. There
6 may be a time delay. Defendant notified the bankruptcy trustee Peter Mastan of this
7 intent.

8 Respectfully submitted,

9
10 

11 Mary Cummins, Defendant

12 Dated: May 5, 2020

DECLARATION OF DEFENDANT MARY CUMMINS

I, MARY CUMMINS, declare as follows:

1. I am Mary Cummins Defendant in pro per. I make this declaration on my personal knowledge of the facts set forth herein.
2. Everything in DEFENDANT’S MOTION was written by me and is the truth to the best of my knowledge.
3. All exhibits cited, footnoted, attached are true and correct copies of the originals.

I, declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 5, 2020 at Los Angeles, California.

By: 

MARY CUMMINS

1 PROOF OF SERVICE
2 (FRCivP 5 (b)) or
3 (CCP 1013a, 2015.5) or
4 (FRAP 25 (d))

5 I am Plaintiff in pro per whose address is 645 W. 9th St. #110-140, Los Angeles,
6 California 90015-1640. I am over the age of eighteen years.

7 I further declare that on the date hereof I served a copy of:

8 MOTION


9 on the following interested parties by email to the following at .

10 Philip H. Stillman
11 Stillman & Associates
12 pstillman@stillmanassociates.com
13

14
15 I declare under penalty of perjury, under the laws of the State of California, that the
16 foregoing is true and correct.

17 Executed this day, May 5, 2020, at Los Angeles, California.

18 Respectfully submitted,

19
20 

21
22 Mary Cummins, Defendan
23 645 W. 9th St. #110-140
24 Los Angeles, CA 90015
25
26
27
28