

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)	DEFENDANT’S MOTION TO
14 <hr style="border: 1px solid black;"/>)	REHEAR MOTION TO DISMISS
15 KONSTANTIN KHIONIDI, as Trustee)	Judge: Honorable Robert N. Kwan
16 of the COBBS TRUST,)	Courtroom: 1675
17 Plaintiff,)	Edward R. Roybal Federal Building
18 vs.)	255 E. Temple St, Suite 1682
19 MARY CUMMINS-COBB)	Los Angeles, CA 90012
20 Defendant.)	Hearing: April 27, 2021 2:30 p.m.

21 **INTRODUCTION**

22 Defendant Mary Cummins files this Motion to Rehear the Motion to Dismiss the
23 Adversary Proceeding. Per Federal Rules of Civil Procedure 17(a) “An action must be
24 prosecuted in the name of the real party in interest.” Plaintiff Konstantin Khionidi does
25 not exist. This is evidence of unclean hands. The Adversary Proceeding should be
26 dismissed in its entirety. This Motion is filed within 14 days of the Court’s ruling of
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1 March 18, 2021 per Federal Rules of Bankruptcy Procedure 8022. This Motion
2 complies with Rules 8013(f)(1) and (2) and Rule 8011.

3 March 18, 2021 the Court filed its STATEMENT OF DECISION RE:
4 DEFENDANT’S MOTION TO DISMISS THE ADVERSARY PROCEEDING.
5 Judge Robert Kwan stated “The motion to dismiss fails to set forth a proper legal basis
6 for dismissing the adversary proceeding after the entry of final judgment in favor of
7 plaintiff, which has been affirmed on appeal to the district court.” Per Federal Rules of
8 Bankruptcy Procedure 8022(a)(2) Defendant will now “state with particularity each
9 point of law or fact that the movant believes the district court or BAP has overlooked
10 or misapprehended and must argue in support of the motion.”

11 Defendant repleads, realleges and incorporates by reference Defendant’s Motion to
12 Dismiss Doc #198 and all previously filed documents and testimony as though fully set
13 forth herein. Defendant adds to that evidence and arguments the following.

14 Defendant has stated that Plaintiff does not exist since the first reply to Plaintiff’s
15 March 10, 2018 Complaint for Adversary Proceeding Doc #1. Even though Defendant
16 stated that Plaintiff does not exist and this is evidence of unclean hands at least 20
17 times before the entry of judgment this Court has never previously considered or ruled
18 upon the specific issue of FRCP 17(a) in a hearing or briefs. No party has been allowed
19 to show evidence of the existence or non-existence of Plaintiff to the Court in a hearing
20 or motion on this specific issue. The Court can’t rule on an issue where a party was not
21 allowed to present evidence and argue the specific issue which is a person who does
22 not exist can’t file a lawsuit per FRCP 17(a). This Court only considered (1) whether
23 the assignment of the judgment from Plaintiff Amanda Lollar to “alleged” Plaintiff
24 Konstantin Khionidi was made Doc #118 and (2) whether the judgment was
25 nondischargeable pursuant to 11 U.S.C. § 523(a)(6). The Appeal issues did not include
26 FRCP 17(a). The fact that Khionidi does not exist preempts entering into a contract,
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1 being assigned a judgment, controlling/owning a trust and most importantly the key
2 issue in the Motion to Dismiss, filing a lawsuit against Defendant.

3 Nowhere has the court ruled after reviewing evidence from parties that Khionidi is
4 a real live person who was legally able to enter into a contract, control a trust, be
5 assigned a judgment and, most importantly, able to legally file a lawsuit in a court of
6 law per FRCP 17(a). The final final order only states “the judgment is determined to be
7 nondischargeable pursuant to 11 U.S.C. § 523(a)(6) and judgment is entered
8 accordingly.”

9 Most importantly ex Plaintiff Amanda Lollar still states to this day that Amanda
10 Lollar is the owner of the judgment and is due over \$11,000,000. Within the last week
11 original Plaintiff and owner of the judgment Amanda Lollar has stated in official legal
12 documents to the originating court of the judgment in question that Amanda Lollar is
13 indeed the “Judgment Creditor” and owner of the judgment (Exhibit 1). One must own
14 an item in order to be an assignor. Allegedly Khionidi is the only owner of the
15 judgment. Amanda Lollar and her Texas lawyer Randy Turner have repeatedly stated
16 to this day “As of April, 2020 the troll still owes over \$11 million. Post-judgment
17 interest is accruing at the rate of \$51,166.77 per month or 1,676.99 per day!”¹ In
18 person at the first 2015 debtor hearing Sister State Judgment case BS140207 after
19 assignment to Konstantin Khionidi Plaintiff Amanda Lollar stated, bragged to, laughed
20 at Defendant Mary Cummins that she, Amanda Lollar is actually the “Russian person”
21 (Mary Cummins, declaration). Defendant stated that Khionidi was not a real person in
22 the Sister State Judgment case.
23

24 In Court documents in this case Plaintiff stated Lollar is definitely not the owner
25 of the judgment or the Plaintiff. That is perjury and fraud which is unclean hands.

26 It is clear the Plaintiff Konstantin Khionidi does not exist and the case should be
27 dismissed per FRCP 17(a). Because this exact issue has never been heard or ruled upon
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¹ Amanda Lollar, Randy Turner ihatemary website <http://www.randyturner.com/randys-cyber-stalker>

1 it is timely to hear today. It would have been timely to hear it previously when it was
2 scheduled for a hearing March 2, 2021 before the judgment on the other issues were
3 final. Defendant even requested that the Motion to Dismiss at the very least be lodged.
4 That hearing should not have been cancelled by the Court to be heard post judgment
5 per Judge Robert Kwan March 30, 2021 then later cancelled again. This issue was
6 never heard. This issue was not on appeal. This Court had the opportunity to hear this
7 specific issue before final final judgment on the other issues but didn't.

8 Per Defendant's Notice of Motion to Plaintiff, Plaintiff had to file a reply to
9 Defendant's Motion to Dismiss at least 14 days prior to the hearing per LBR 9013-1.
10 That would have been March 16. Plaintiff never filed a reply. At the 15 day point they
11 lost by default. Four days later 11 days before the hearing Judge Robert Kwan
12 cancelled the hearing after Plaintiff should have lost by default.

13 Because of this fraudulently obtained Texas judgment and Plaintiff Amanda
14 Lollar's defamatory, libelous, harassing behavior Defendant Mary Cummins cannot
15 obtain work, is indigent and cannot afford a lawyer. Defendant is forced to be a pro se
16 party for the last 11 years in cases in two states and five different types and levels of
17 Courts having to learn state law, federal law, court procedures for each court and each
18 type of law practice in the states of California and Texas. Defendant is not a lawyer or
19 legal aide but in a completely different field.

20 Plaintiff has attorneys including Florida attorney [Philip Stillman](#) and Texas attorney
21 [Randall Turner](#). In this case every time Stillman makes a mistake, Judge Robert Kwan
22 tells Stillman his exact mistake, how to specifically correct it and then allows
23 unlimited time for Stillman to correct the mistake and refile, see Order Doc #19. If
24 Defendant makes a mistake, Defendant loses the motion or hearing. Plaintiff Lollar et
25 al have been stating that Judge Robert Kwan is in their "pocket." Defendant is starting
26 to believe this may very well be the reality.
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1 Per the California Court guide in this court's own website "Judicial Ethics and Self
2 Represented Litigations"² "Under the code of judicial conduct, no reasonable question
3 is raised about a judge's impartiality when the judge, in an exercise of discretion,
4 makes procedural accommodations that will provide a self-represented litigant acting
5 in good faith the opportunity to have his or her case fairly heard — and, therefore, a
6 judge should do so."

7 "a trial judge should instruct a self-represented litigant in the proper procedures for
8 any action he or she is obviously attempting to accomplish. Facilitating an
9 unrepresented litigant's presentation of his or her own case, as the litigant has
10 conceived it, is the provision of legal information, not legal advice."

11 Defendant brought up the fact that Plaintiff is not a real person multiple times.
12 Below is a list of just a few of the times Defendant mentioned this specifically and
13 stated the case should be dismissed for this reason. This issue was raised before the
14 judgment was final and should have been heard.

15 April 11, 2018 Reply to Adversary Proceeding complaint, Doc #8, Pg 3, lines 5-6
16 "plaintiff is an alleged unknown entity, a straw man. Konstantin Khionidi." Pg 3, lines
17 11-12 "the actual owner of the judgment must be unmasked if defendant is to have a
18 fair trial." Pg 4 lines 6-7, "the strawman must be unmasked." Defendant requested that
19 the complaint be dismissed due to unclean hands, perjury, false statements. Also Doc
20 #9.

21 May 17, 2018 Reply to Plaintiff's Motion Summary Judgment, Doc #16. Paraphrased,
22 Plaintiff is not a real person.

23 May 25, 2018 Tentative and final ruling on Plaintiff's first Motion Summary Judgment.
24 "Deny Plaintiff's motion for judgment on the pleadings because" "(2) no proof of
25 standing to assert claim of Amanda Lollar - Defendant denies that plaintiff is lollar's
26 assignee in her answer, which also precludes judgment on the proceedings." Defendant
27 actually stated Plaintiff does not exist.

28 ² California Court Judge Pro Se Reference Guide
<https://www.courts.ca.gov/partners/documents/ReachingOutOverreaching.pdf>

1 September 29, 2018 Defendant's interrogatory to Plaintiff "Provide YOUR, the actual
2 Plaintiff's, the person who owns the judgment, legal name, current home address and
3 current principal place(s) of business from January 1, 2012 through the present."
Information not produced. Same with document request.

4 October 23, 2018 Doc #24 Pg 2, lines 12-13, "Plaintiff is an unknown most likely
5 straw man Russian living in Russia allegedly named "Konstantin Khionidi.""

6 December 19, 2018 Defendant's reply to Plaintiff's second Motion Summary
7 Judgment, Doc #39. Paraphrased, Plaintiff is not a real person.

8 February 4, 2019 Motion Compel Discovery, Doc #47, 48 Paraphrased, Plaintiff is not
9 a real person. Defendant's Declaration stated Plaintiff Amanda Lollar stated to
10 Defendant in person at the debtor hearing that Plaintiff is not real person.

11 February 11, 2019 Doc #50. Plaintiff is not a real person.

12 March 5, 2019 Doc #56. Defendant's Motion to Dismiss unclean hands. Plaintiff is not
13 a real person.

14 March 20, 2019 Doc #69 Amended Motion to Dismiss. Plaintiff is not a real person.

15 October 8, 2019 Defendant's Motion Summary Judgment. Doc #91. "Konstantin
16 Khionidi is not a real person." Pg 4, lines 9-10, "Khionidi is a straw man who does not
17 exist." Pg 7, lines 9-10. Only ruled if assignment was made. It was not as Plaintiff is
18 not real person. Need two real people for a contract or assignment. Need a real person
19 to file a lawsuit. Also Docs 92, 93, 94.

20 November 25, 2019 Doc #108 Defendant's Reply to Plaintiff's Motion Summary
21 Judgment. "Khionidi does not exist and is merely a straw person."

22 January 8, 2020 Doc #114 Defendant's Motion Summary Judgment, Declaration.
23 "Khionidi is not a real person, does not exist."

24 August 19, 2020 Defendant's Motion Contempt. Doc #179 pg 3, lines 4-15. "In this
25 case Plaintiff doesn't even exist. Original Plaintiff Amanda Lollar who is actually still
26 the real Plaintiff allegedly gave this judgment to a Russian living in Russia Konstantin
27 Khionidi. Stillman swore in Court he would prove Khionidi existed by having
28 Khionidi sign a notarized agreement. Khionidi has never done this because Khionidi
does not exist. A person who does not exist can't file a lawsuit. Plaintiff intentionally

1 filed a complaint with the purpose to hide using a fictitious name without leave of
2 court. CAL. CODE CIV. PRO. § 367: “Every action must be prosecuted in the name of
3 the real party in interest.” Plaintiff Amanda Lollar admitted that Lollar is the Russian
4 to Defendant (Declaration). The underlying agreement shows that Lollar is still the real
5 Plaintiff. This makes the Adverse Proceeding null and void. The case should be
6 dismissed.”

7 September 8, 2020 on video at the hearing for the Motion Contempt above Defendant
8 again mentioned and cited CCCP 367. Judge Robert Kwan acknowledged this and
9 replied on the record "that is state law and not federal." Judge Robert Kwan clearly
10 knew Defendant's intention. The Federal law is the exact same as the California state
11 law, i.e. Federal Rules of Civil Procedure 17(a) “An action must be prosecuted in the
12 name of the real party in interest.”

13 August 10, 2020 2:20-cv-02149-AB. Appeal Brief. Doc #33 Pg 8, "Amanda Lollar is
14 pretending to be, impersonating Konstantin Khionidi who does not exist. Someone
15 who does not exist cannot file a lawsuit. This case and now reply to appeal must be
16 dismissed due to unclean hands."

17 September 11, 2020 2:20-cv-02149-AB. Appeal Brief. "Lollar is pretending to be,
18 impersonating Konstantin Khionidi who does not exist. Someone who does not exist
19 cannot file a lawsuit. This case and now reply to appeal must be dismissed due to
20 unclean hands."

21 January 22, 2021 2:20-cv-02149-AB. Motion Rehear Appeal. Doc # 42. pg 5,
22 "Plaintiff still does not exist. A non-existent entity cannot file a complaint."

23 January 31, 2021 Doc #191 Motion to Dismiss. Hearing set March 2, 2021 2:30 p.m.
24 Plaintiff does not exist.

25 February 26, 2021 Doc #198. Motion to Dismiss. Hearing set March 30, 2021. Plaintiff
26 does not exist.

27 Defendant even cited in a Motion before the Court cited above California law
28 before the appeal stating the case must be dismissed per CAL. CODE CIV. PRO. §
367: “Every action must be prosecuted in the name of the real party in interest.” Judge
Robert Kwan replied at that hearing “that is state law and not Federal law.” Federal
law clearly states the exact same thing under 17(a), i.e. “An action must be prosecuted

1 in the name of the real party in interest.” If Defendant should have brought a specific
2 Motion to Dismiss on this specific issue under Federal code number at an earlier
3 separate time, Defendant should have been advised as such by the Court. The Court
4 clearly knew that Defendant alleged that Plaintiff does not exist and cannot file a
5 lawsuit against Defendant. Defendant’s intentions were very clear as Defendant has
6 been yelling this from the mountain tops ever since Plaintiff Khionidi was added to the
7 case in 2015.

8 For all these reasons in order for Pro Se Defendant to receive a fair and just trial
9 Defendant Pro Se’s Motion to Dismiss must be heard.

10 Defendant in discovery requested proof that Plaintiff existed by requesting a copy
11 of Plaintiff’s passport, full name, address and other identifying information. Plaintiff
12 refused to provide the information. Defendant was forced to file a Motion to Compel
13 on these items. For some unknown reason Judge Robert Kwan would not compel the
14 alleged Russian person in Russia to provide this documentation. Defendant also
15 requested to depose Plaintiff Khionidi and Lollar. Defendant was shut down by the
16 Court stating they are over 100 miles away and Lollar is a non party even though she is
17 a party. For these reasons Defendant was not allowed to do any real discovery. If
18 anyone can use a fake person not living in Siberia to file lawsuits, avoid discovery,
19 avoid depositions, avoid service, criminals would be lining up for this service. That is
20 why this behavior is not allowed.

21 Previously Plaintiff stated they would prove to the Court that Plaintiff is real by
22 having the alleged Russian Plaintiff sign and notarize a document transferring the
23 judgment to Amanda Lollar, see Motion to Dismiss. This Court gave Plaintiff months
24 to do this. Plaintiff gave one excuse after another about the Russian vacationing all
25 over the world and couldn’t find a notary. Plaintiff never proved Plaintiff exists after
26 given ample opportunity. This proves Plaintiff does not exist. It’s now too late for the
27 alleged Russian to sign the judgment to Lollar because Plaintiff would be outside of
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1 the Statute of Limitations to file an objection to discharge. It's also unclean hands and
2 fraud upon the Court as Plaintiff through Stillman swore over and over that Plaintiff is
3 a real person.

4 **CONCLUSION**

5 For all these reasons in order for Pro Se Defendant to receive a fair and just trial
6 Defendant Pro Se's Motion to Dismiss must be heard. For the foregoing reasons
7 Defendant Mary Cummins hereby requests that this Court hear the Motion to Dismiss
8 per FRCP 17(a). Plaintiff requests this Court to dismiss Plaintiff's Adversary
9 Proceeding because Plaintiff is not a real person and cannot file a lawsuit.

10 Respectfully submitted,

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13 Mary Cummins, Defendant pro se

14 March 22, 2021
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19 Attached:

20 Notice of Hearing

21 Notice of Zoom Hearing in Adversary Proceeding
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2 **DECLARATION OF DEFENDANT MARY CUMMINS**

3 I, MARY CUMMINS, declare as follows:

- 4 1. I am Mary Cummins Defendant in pro per. I make this declaration on my
5 personal knowledge of the facts set forth herein.
- 6 2. Everything in DEFENDANT’S MOTION TO REHEAR MOTION TO
7 DISMISS was written by me and is the truth to the best of my knowledge.
- 8 3. All exhibits cited, footnoted, attached are true and correct copies of the originals.
- 9 4. Ex Plaintiff Amanda Lollar told me in person to my face in 2015 that the
10 Russian does not exist. Lollar stated Lollar is the alleged “Russian” then Lollar
11 laughed at me.

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

14 Executed on March 22, 2021 at Los Angeles, California.

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16 By: 
17 MARY CUMMINS
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**CERTIFICATE OF CONFERENCE
MEET AND CONFER**

On March 22, 2021 I conferred with Philip Stillman attorney for Plaintiff in email about this Motion to Dismiss. Stillman stated he does not agree to this Motion to Dismiss. Exhibit 2.

Executed this day, 23rd day of March 2021, at Los Angeles, California.



Mary Cummins, Defendant

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

UNITED STATES BANKRUPTCY COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA

<p>In re:</p> <p>MARY CUMMINS-COBB,</p> <p style="text-align: center;">Debtor</p> <hr/> <p>KONSTANTIN KHIONIDI, as Trustee Of the COBBS TRUST,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>MARY CUMMINS-COBB</p> <hr/> <p style="text-align: center;">Defendant.</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>) [PROPOSED] ORDER ON DEFENDANT’S MOTION REHEAR</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> <p>) April 27, 2021 2:30 p.m. hearing</p>
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1 Defendant Mary Cummins filed a Motion to Rehear. Having read the motion and
2 for good cause appearing, the Motion is granted/denied.

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4 **IT IS SO ORDERED.**

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8 _____
Honorable Judge Robert Kwan

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10 Date: _____

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3 PROOF OF SERVICE
4 (FRCivP 5 (b)) or
5 (CCP 1013a, 2015.5) or
6 (FRAP 25 (d))
7

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

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

11 MOTION TO REHEAR MOTION TO DISMISS

12 on the following interested parties by email to the following atand also by ECF.

13 Philip H. Stillman
14 Stillman & Associates
15 pstillman@stillmanassociates.com
16

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

19 Executed this day, March 23, 2021, at Los Angeles, California.

20 Respectfully submitted,

21 
22

23 Mary Cummins, Defendant

24 Dated: February 26, 2021

25 645 W. 9th St. #110-140

26 Los Angeles, CA 90015
27
28

APPLICATION FOR EXECUTION
DISTRICT CLERK, TARRANT COUNTY, TEXAS

FILED
TARRANT COUNTY
3/16/2021 4:28 PM
THOMAS A. WILDER
DISTRICT CLERK

- TYPE OF EXECUTION:
- Money Judgment (rule 630)
 - Sale of Particular Property (rule 631)
 - Delivery of Real Property (rule 632)
 - For Costs Only (rule 129)
 - Possession for Value of Personal Property (rule 633)

CASE NUMBER: 352-248169-10

Bat world Sanctuary and vs Mary Cummins
Amanda Lollar vs Mary Cummins
 (Plaintiff) (Defendant)

JUDGMENT CREDITOR(S):

1. Amanda Lollar (assignor)
2. Konstantin Khionidi (assignee)

DATE OF JUDGMENT: DAY 27th MONTH August YEAR 2012

PRIMARY DEBTOR(S) WITH SERVICE ADDRESS: (only one primary debtor per writ)

1. Mary Cummins: mmmarycummins@gmail.com and
mmmaryinLa@aol.com; 645 w. 9th st, #110-140, Los Angeles, CA.
 OTHER JUDGMENT DEBTOR(S): (only if debtors are mentioned in judgment) 90015
Debtor will be served by email

2. _____
3. _____

LIABLE JOINTLY & SEVERALLY: YES NO

NUMBER OF DAYS TO EXECUTE: 30 60 90

JUDGMENT DUE A CREDIT: YES NO AMOUNT: \$ 4,390.⁷⁵

ATTORNEY NAME: Randall E. Turner <----lawyer for Amanda Lollar

ADDRESS: 2417 Park Hill Dr., Suite B
Ft. Worth, Tx 76110

PHONE NO: 817-420-9690

BARID: • 20328310

Re: Motion to Rehear Motion to Dismiss

1 message

Mary Cummins <mmmarycummins@gmail.com>
To: Philip Stillman <pstillman@stillmanassociates.com>

Mon, Mar 22, 2021 at 11:20 AM

Your client is using this judgment for harassment purposes only. She's not after money. If she were after money, she wouldn't defame, libel, slander, harass, ridicule, threaten me all over the internet and in person. Her online defamation keeps me from making any money. She is the reason I was forced to file for bankruptcy. That and using the fake Russian to file the complaint is the ultimate evidence of unclean hands. I will never give up fighting for justice in this case. I never defamed plaintiffs or caused a penny of damages. Plaintiff swore pre trial on the record in court that Plaintiff Lollar would never request one penny just so she wouldn't have to show any receipts, tax returns, bank statements, medical records or any documents. Plaintiff swore in trial that she had no evidence of any damages or causation of anything by me. That is in the transcript. I will never give up fighting for justice in this case. You have job security until this judgment is reversed.

On Mon, Mar 22, 2021 at 10:35 AM Philip Stillman <pstillman@stillmanassociates.com> wrote:

Obviously I do not. Stop wasting my time. You lost. Live with it. Since you claim not to have any money anyway, why do you even care?

On Mar 22, 2021, at 1:30 PM, Mary Cummins <mmmarycummins@gmail.com> wrote:

I'm filing a motion to rehear the motion to dismiss. Do you agree or not?

--

Real Estate Appraiser, Expert Witness for over 35 years

Mary Cummins

Los Angeles, California

MaryCummins.com

[facebook.com/CumminsRealEstateServices](https://www.facebook.com/CumminsRealEstateServices)

Direct: (310) 877-4770

Fax: (310) 877-4770

Se habla Español

Resume

We're a paperless office. Please, don't give us paper copies of comps. Just email them. Thanks.

--

Real Estate Appraiser, Expert Witness for over 35 years

Mary Cummins

Los Angeles, California

MaryCummins.com

[facebook.com/CumminsRealEstateServices](https://www.facebook.com/CumminsRealEstateServices)

Direct: (310) 877-4770

Fax: (310) 877-4770

Se habla Español

Resume

We're a paperless office. Please, don't give us paper copies of comps. Just email them. Thanks.

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Mary Cummins Pro Se Defendant 645 W 9th St #110140 Los Angeles CA 90015 (310) 877 4770 mmmarycummins@gmail.com <input checked="" type="checkbox"/> Individual appearing without attorney <input type="checkbox"/> Attorney for:	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - **SELECT DIVISION**	
In re: KONSTANTIN KHIONIDI, as Trustee of the COBBS TRUST, <div style="text-align: center;"> Plaintiff, vs. MARY CUMMINS-COBB Defendant. </div> <div style="text-align: right; margin-top: 20px;"> Debtor(s). </div>	CASE NO.: 2:17-bk-24993-RK CHAPTER: 7 <input type="button" value="v"/> NOTICE OF MOTION FOR: 2:18-AP-01066-RK Motion to Rehear Motion to Dismiss <i>(Specify name of Motion)</i> DATE: 04/27/2021 TIME: 2:30 pm COURTROOM: 1675 PLACE: Edward R. Roybal Federal Building 255 E Temple Los Angeles, CA 90012

1. TO (specify name): Philip Stillman
2. NOTICE IS HEREBY GIVEN that on the following date and time and in the indicated courtroom, Movant in the above-captioned matter will move this court for an Order granting the relief sought as set forth in the Motion and accompanying supporting documents served and filed herewith. Said Motion is based upon the grounds set forth in the attached Motion and accompanying documents.
3. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

4. **Deadline for Opposition Papers:** This Motion is being heard on regular notice pursuant to LBR 9013-1. If you wish to oppose this Motion, you must file a written response with the court and serve a copy of it upon the Movant or Movant's attorney at the address set forth above no less than fourteen (14) days prior to the above hearing date. If you fail to file a written response to this Motion within such time period, the court may treat such failure as a waiver of your right to oppose the Motion and may grant the requested relief.
5. **Hearing Date Obtained Pursuant to Judge's Self-Calendaring Procedure:** The undersigned hereby verifies that the above hearing date and time were available for this type of Motion according to the judge's self-calendaring procedures.

Date: 03/23/2021

Mary Cummins, pro se
Printed name of law firm



Signature

Mary Cummins, pro se
Printed name of attorney

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and a party to this bankruptcy case or adversary proceeding. My business address is: 645 W 9th St #110140, Los Angeles, CA 90015

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION FOR** (specify name of motion) Motion to Rehear Motion to Dismiss

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:**

On (date) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 03/22/2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.


pstillman@stillmanassociates.com

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

03/22/2021
Date

Mary Cummins
Printed Name


Signature

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Mary Cummins Defendant Pro Se 645 W 9 th St #110140 Los Angeles CA 90015 mmmaryinla@aol.com mmmarycummins@gmail.com Direct 310 877 4770 Fax 310 494 9395 <input type="checkbox"/> Attorney for Movant <input checked="" type="checkbox"/> Movant appearing without an attorney	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION	
In re: Konstantin Khionidi Debtor(s). Mary Cummins	CASE NO.: 2:17-bk-24993-RK CHAPTER: 7
Konstantin Khionidi Plaintiff(s) v. Mary Cummins Defendant(s)	ADV. NO. 2:18-ap-01066-RK SUPPLEMENTAL NOTICE OF HEARING TO BE HELD REMOTELY USING ZOOMGOV AUDIO AND VIDEO HEARING DATE: April 27, 2021 HEARING TIME: 2:30 pm
Movant: Mary Cummins	

- The Movant has filed the following written notice or other pleading ("Notice") advising of a hearing to be held in the above-captioned case, on the date and time indicated above, before the Honorable Robert N. Kwan, United States Bankruptcy Judge (*insert name of pleading and, if available, docket number*):

Motion to Rehear Motion Dismiss. No docket # as not filed yet.

2. **Please be advised that because of the COVID-19 pandemic, the Court will conduct the hearing using ZoomGov audio and video technology.** Information on how to participate in the hearing using ZoomGov is provided on the following page of this notice.
3. Hearing participants and members of the public may participate in and/or observe the hearing using ZoomGov, free of charge.
4. Individuals may connect by ZoomGov audio and video using a personal computer (equipped with camera, microphone and speaker), or a handheld mobile device with an integrated camera, microphone and speaker (such as an iPhone, iPad, Android phone or Android tablet). The connection can be initiated by entering the "Meeting URL" into a web browser on any of these devices, provided the device is connected to the Internet. Individuals connecting in this manner will be prompted for the Meeting ID and Password shown below.
5. Individuals also may connect to the hearing by telephone only, using the telephone number provided below. Individuals connecting in this manner also will be prompted for the Meeting ID and Password.
6. Neither a Zoom nor a ZoomGov account is necessary to participate in or observe the hearing, and no pre-registration is required.
7. The audio portion of the hearing will be recorded electronically by the Court and constitute its official record.
8. All persons are strictly prohibited from making any other recording of court proceedings, whether by video, audio, "screenshot," or otherwise. Violation of this prohibition may result in the imposition of monetary and non-monetary sanctions.
9. The following is the unique ZoomGov connection information for the above-referenced hearing:

Meeting URL:
Meeting ID:
Password:
Telephone:

10. More information on using ZoomGov to participate in this hearing is available on the Court's website at the following web address: <https://www.cacb.uscourts.gov/news/zoom-video-hearing-guide-participants>

Date: 03/23/2021

Printed name of law firm (if applicable)

Mary Cummins 03/23/2021

Printed name of individual Movant or attorney for Movant



