

MARY CUMMINS
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COURT OF APPEALS
SECOND APPELLATE DISTRICT

MARY CUMMINS

Appellant

v.

AMANDA LOLLAR

Appellee

) Case No. B251854

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

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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consumer debt and shows how excessive borrowing undermines the prosperity of middle class America While the recession that began in mid 2007 has widened the scope of the financial pain caused by overindebtedness the problem predated that large scale economic meltdown And by all indicators consumer debt will be a defining feature of middle class families for years to come The staples of middle class life going to college buying a house starting a small business carry with them more financial risk than ever before requiring more borrowing and new riskier forms of borrowing This book reveals the people behind the statistics looking closely at how people get to the point of serious financial distress the hardships of dealing with overwhelming debt and the difficulty of righting one s financial life In telling the stories of financial failures this book exposes an all too real part of middle class life that is often lost in the success stories that dominate the American economic narrative Authored by experts in several disciplines including economics law political science psychology and sociology Broke presents analyses from an original proprietary data set of unprecedented scope and detail the 2007 Consumer Bankruptcy Project Topics include class status home ownership educational attainment impacts of self employment gender differences economic security and the emotional costs of bankruptcy The book makes judicious use of illustrations to present key findings and concludes with a discussion of the implications of the data for contemporary policy debates House documents ,1895

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