

STATE OF MICHIGAN
IN THE 45B DISTRICT COURT

CYPRESS FINANCIAL RECOVERIES LLC
As Successor in Interest of HSBC Card Services (III) Inc.
Plaintiff

Case No. xxxxx
Hon. Judge

SUSIE STRONGHEART
Defendant

**MOTION FOR LEAVE TO SUBMIT RESPONSES TO REQUESTS FOR ADMISSIONS
TWO DAYS OUT OF TIME**

Comes now Defendant, Pro se, and for her Motion to File Responses to Requests for Admissions Two Days Out of Time states as follows:

1. Defendant received the Summons and Petition in this matter on February 26, 2012 and timely filed her Answer on March 19, 2012.

Plaintiff served initial discovery, including Requests for Admissions, on March 15, 2012, and the date on which responses were due was April 14, 2012.

Defendant had not had time to understand the legal issues involved and respond to plaintiff's Requests for Admissions and other discovery and was confused by the format in which the materials were presented.

Accordingly, Defendant missed the deadline for filing her responses, but now wishes to file them.

A copy of Defendant's Responses to Plaintiff's Requests for Admissions is attached hereto.

Defendant requests leave to file the attached Responses to Requests for Admissions. Defendant did not intend needlessly to delay matters by her delay, nor does she bring this motion for any other improper purpose, and she will be prejudiced if this motion is denied. Plaintiff has not been prejudiced by defendant's very brief delay in responding.

Wherefore, Defendant prays this Court grant her leave to file her Responses to Plaintiff's Requests for Admissions.

Respectfully submitted,

Susie Strongheart
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Dated: April 16, 2012