

Cause No. 352-248169-10

**BAT WORLD SANCTUARY and
AMANDA LOLLAR,**

Plaintiffs,

vs.

MARY CUMMINS,

Defendant Pro se

§ IN THE DISTRICT COURT

§ TARRANT COUNTY, TEXAS

§ 352nd JUDICIAL DISTRICT

MOTION TO RECONSIDER ORDER ON PLAINTIFFS' MOTION FOR CONTEMPT

TO THE HONORABLE JUDGE OF SAID COURT:

Mary Cummins, Defendant Pro se, files this Motion to Reconsider Order on Plaintiffs' Motion for Contempt, and in support shows the following:

1.

January 9, 2012 Judge Bonnie Sudderth heard Plaintiffs' Motion for Contempt. Judge Sudderth stated that she will sign an order as soon as she receives an order to her satisfaction from Plaintiffs' attorney.

2.

January 9, 2012 Defendant contacted Defendant's landlord to notify the landlord that Defendant would be sharing the address of landlord's rental property located in Los Angeles County, California. Defendant's landlord stated that landlord will not allow Defendant to share the address of landlord's property. Landlord does not want the property to be possibly vandalized by others if they receive the home address. Landlord forced Defendant to sign a confidentiality agreement as to the home address (Exhibit 1).

3.

January 10, 2012 Defendant was informed by court that Judge Bonnie Sudderth had signed an Order on Plaintiffs' Motion for Contempt. Defendant has not yet received a

1 signed copy. (Unsigned copy Exhibit 2). The Order stated that Defendant must give
2 Defendant's home address to Plaintiffs' attorney Randy Turner.

3 4.

4 Defendant cannot share the home address because of a pre-existing confidentiality
5 agreement with Defendant's landlord signed the day before the order was signed by
6 Judge Sudderth.

7 WHEREFORE DEFENDANT RESPECTFULLY PRAYS this court will reconsider
8 Judge's Order on Plaintiffs' Motion for Contempt.
9


10 Respectfully submitted,

11
12 Mary Cummins, Defendant Pro se
13 645 W 9th St, #110-140
14 Los Angeles, CA 90015-1640
15 Phone 310-877-4770
16 Email: mmmaryinla@aol.com

17 By: 
18 Mary Cummins, Defendant Pro Se

CERTIFICATE OF SERVICE

1 I, Mary Cummins, hereby certify that a TRUE COPY of the above **DEFENDANT'S**
2 **MOTION TO RECONSIDER ORDER ON PLAINTIFFS' MOTION FOR CONTEMPT**
3 was served on the Plaintiffs' Attorney of record by FAX and by FIRST CLASS MAIL at
4 Randy Turner
5 Turner & McKenzie
6 1800 N. Norwood Dr # 100
7 Hurst, Texas 76054
8 Fax: 817-268-1563
9 this 11th Day of January, 2012

7 
8 _____
9 Mary Cummins, Defendant Pro se
10 645 W 9th St, #110-140
11 Los Angeles, CA 90015-1640
12 Phone 310-877-4770
13 Email: mmmarvinla@aol.com

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**BAT WORLD SANCTUARY and
AMANDA LOLLAR,
*Plaintiffs***

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IN THE DISTRICT COURT

v.

TARRANT COUNTY, TEXAS

**MARY CUMMINS,
*Defendant***

352nd JUDICIAL DISTRICT

ORDER ON PLAINTIFFS' MOTION FOR CONTEMPT

On the 9th day of January, 2012 came on to be heard the motion for contempt filed by the plaintiffs. The plaintiffs appeared in person and by their attorney and announced ready. The defendant, Mary Cummins, appeared pro se and announced ready.

After hearing the evidence and arguments the Court finds that Mary Cummins failed and refused to obey the Court's order that was signed on November 28, 2011 which ordered her to furnish and disclose to Randall Turner her home address within ten days after the Court signed that order. Therefore, the Court finds that Mary Cummins is in contempt of court.

IT IS ORDERED THAT Mary Cummins pay to the plaintiffs, Bat World Sanctuary and Amanda Lollar, the sum of one hundred dollars (\$100) each day beginning January 9, 2012 until Mary Cummins discloses her home address to Randall Turner.

SIGNED this ____ day of January, 2012.

JUDGE PRESIDING



Confidentiality Agreement

I Mary Cummins do hereby agree to be bound by the following:

I will never share the address of my current rental residence located in Los Angeles County, California. I may not give this address to anyone other than the authorities. I may not use it for mailing purposes or deliveries.

I agree to pay landlord for any damages caused to the rental property by others as a result of sharing the home address.


All obligations under this Agreement of Confidentiality shall remain in full force during rental of this property.

This Agreement shall be governed and construed in accordance with the laws of the United States and the State of California.

If any term of this Agreement is held by a court of competent jurisdiction to be invalid or unenforceable then this Agreement including all of the remaining terms, will remain in full force and effect as if such invalid or unenforceable term had never been included.



Mary Cummins



Date