

1 history of manufacturing falsehoods about people and then posting them on the
2 internet." Plaintiff has provided no evidence to support this outrageous and defamatory
3 claim.

4 5. Defendant denies Plaintiffs' statement "Defendant has also edited and altered
5 video recordings that were previously made at Bat World Sanctuary and posted the
6 altered defamatory versions of the recordings all over the internet." Defendant added
7 captions to one video. Defendant posted that video to YouTube only. The video itself
8 was never altered, edited or cut. All of the other videos were never edited or altered in
9 any manner. Again, Plaintiffs have shown no evidence to support this outrageous claim.

10 6. On the contrary it is Plaintiff who has highly edited clips of the videos of the
11 deposition of Defendant. Plaintiff has made over 25 highly edited movies out of many
12 clips from the deposition. These clips were strung together to make it seem as though
13 the Defendant didn't know the answer to some questions by selectively omitting
14 sentences. Defendant believes Plaintiffs have done this to harass and defame
15 Defendant. These videos were publicly posted to YouTube with Defendant's name
16 "Mary Cummins" her non-profit name "Animal Advocates" and such key words as
17 "cyberstalking." (Exhibit 2) One such video is entitled "taking videos without permission."
18 Defendant had written and oral permission to take videos as evidenced by previous
19 exhibits to the court. The video title is defamatory.

20 7. Defendant needs the videos from the deposition in order to write off the minutes
21 which were due October 7, 2011.

22 8. Defendant believes that the video will show that Plaintiff spoke during the
23 deposition. The court reporter did not record what Plaintiff said. In fact in the highly
24 edited movies which Plaintiffs published to the Internet you can hear Plaintiff speak yet
25 the court reporter did not record what Plaintiff said.

1 9. Defendant believes that improper action by attorneys may have taken place at the
2 deposition. Defendant needs the videos to prove or disprove this.

3 10. Defendant believes that Plaintiffs are refusing to turn over the deposition videos
4 because they will (a) show that Plaintiff spoke during the deposition and was not
5 recorded and (b) there were improper actions by the attorneys.

6 11. Defendant asks the court to compel Plaintiffs to produce copies of the deposition
7 videos to Defendant. Alternatively Defendant asks the court to compel Plaintiffs to
8 produce copies of the deposition videos to Defendant if both Plaintiff and Defendant
9 agree not to edit, alter, email, share with anyone other than government authorities or
10 counsel, or allow any portion of the videos to end up on the Internet. Defendant would
11 agree to videos being under seal. Plaintiff would have to agree to remove all previously
12 posted videos of Defendant's deposition from the Internet.

13 Respectfully submitted,

14
15 Mary Cummins, Defendant Pro se
16 645 W 9th St, #110-140
17 Los Angeles, CA 90015-1640
18 Phone 310-877-4770
19 Email: Mary@AnimalAdvocates.us

20 By: 
21 _____
22 Mary Cummins, Defendant Pro Se
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25

CERTIFICATE OF SERVICE

1 I, Mary Cummins, hereby certify that a TRUE COPY of the above DEFENDANT'S
2 **RESPONSE AND OBJECTION TO PLAINTIFFS' MOTION TO AMEND TEMPORARY**
3 **INJUNCTION** was served on the Plaintiffs' Attorney of record by FAX and by FIRST
4 CLASS MAIL at

5 Randy Turner
6 Turner & McKenzie
7 1800 N. Norwood Dr # 100
8 Hurst, Texas 76054
9 Fax: 817 268-1563
10 this 20th Day of October, 2011

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Mary Cummins
Mary Cummins, Defendant Pro se
645 W 9th St, #110-140
Los Angeles, CA 90015 1640
Phone 310-877 4770

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CAUSE NO. 352-248169-10

BAT WORLD SANCTUARY and AMANDA LOLLAR, <i>Plaintiffs</i>	§ § § § § § § § § §	IN THE DISTRICT COURT TARRANT COUNTY, TEXAS 352nd JUDICIAL DISTRICT
v.		
MARY CUMMINS, <i>Defendant</i>		

**PLAINTIFF'S NOTICE OF INTENT TO TAKE ORAL DEPOSITION OF
DEFENDANT, MARY CUMMINS**

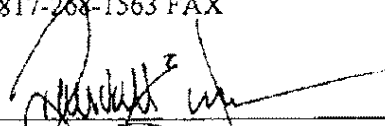
To: Pro Se Defendant, MARY CUMMINS, 645 W. 9th Street, #110-140a
Los Angeles, California 9005.

Please take notice that Plaintiffs, by and through their attorney of record, will take the oral deposition MARY CUMMINS on **Wednesday, June 22, 2011 at 10:00 a.m.** at the Law Office Turner & McKenzie, 1800 Norwood Drive, Suite 100, Hurst, Texas 76054.

Such deposition will continue until concluded to the satisfaction of all parties and may be used in evidence in the above styled and numbered cause. This deposition may be videotaped.

Respectfully submitted,

LAW OFFICE OF TURNER & MCKENZIE
1800 N. Norwood Drive, Suite 100
Hurst, TX 76054
817-282-3868 Phone
817-268-1563 FAX



RANDALL E. TURNER
SBN: 20328310
ATTORNEY FOR PLAINTIFFS

Handwritten initials or mark at the bottom of the page.

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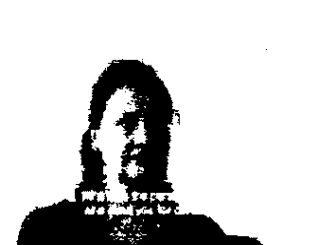


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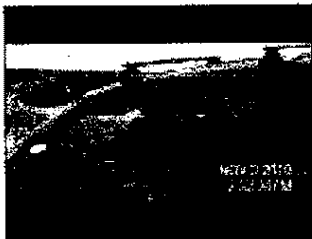


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