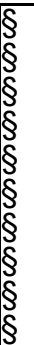


Cause No. 2015-002259-2

<p>AMANDA LOLLAR, Plaintiff, vs. MARY CUMMINS, Defendant Pro se</p>		<p>IN THE COUNTY COURT OF LAW NUMBER 2 TARRANT COUNTY, TEXAS</p>
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NOTICE TO JUDGE DAVID EVANS PRESIDING JUDGE 8TH ADMINISTRATIVE DISTRICT

TO THE HONORABLE DAVID EVANS:

Plaintiff's cause is completely without merit. It is based on forged emails, forged evidence, forged exhibits, forged court orders and stolen documents. Defendant asks Judge Evans to please take note of the recent filings in case 352-248169-10 and 2015-002259-2 as proof of crimes committed by Plaintiff and their attorney Randy Turner. This court and the state of Texas do not have jurisdiction in these cases. Defendant will show the court the following.

INTRODUCTION

Defendant was sued for defamation and breach of contract in 2010. Defendant never defamed or breached a contract. Trial court ruled for Plaintiff. Even though Plaintiff never even stated what they felt was defamatory, never showed any damages, admitted they had no proof of damages or causation by Defendant, visiting Judge William Brigham awarded Plaintiffs \$6.2 million.

1 The Second Court of Appeals reversed the breach of contract, liquidated damages,
2 attorney fees claims but did not reverse the defamation claim. Supreme Court of Texas
3 refused to hear the petition.

4 Plaintiffs filed a sister state judgment in California and took Defendant's only bank
5 account in 2013. Defendant has not had a bank account since then.

6
7 Plaintiffs have also defamed, harassed, and threatened Defendant since 2010
8 making it impossible to get work. Plaintiffs and their attorney have made over 400 blogs,
9 websites, Facebook pages devoted to attacking and defaming Defendant and others.
10 Plaintiffs also attack USDA veterinarians, ACLU, Public Citizen and animal rights
11 attorneys who helped Defendant, Defendant's family members, volunteers, past
12 employers and anyone who has ever heard of Defendant.

13 Plaintiffs filed the exact same copy/paste 352nd lawsuit against defendant April 2015
14 Cause 2015-002259-2 even the breach of contract claim which was reversed. Plaintiff
15 filed the false breach of contract claim in order to have the forum be Tarrant County,
16 Texas as per the forged contract. This was the reason it was filed originally as Texas
17 was not the jurisdiction for this case which Defendant argued. Plaintiff stated repeatedly
18 that Defendant allegedly defamed Plaintiff after Defendant returned to Defendant's
19 home in California.

20
21 In the 352nd case Plaintiff's attorney Randy Turner bragged to Defendant in court
22 before a hearing "I've known this judge for years. He'll sign anything I put in front of
23 him." Turner sent the final judgment to Judge Brigham's personal residence. Judge
24 William Brigham signed the court orders without even reading them. Judge Brigham has
25 since died at the age of 86.

1 Defendant filed a Motion to Dismiss the 2015-002259-2 lawsuit per the Defamation
2 Mitigation Act, Citizen Participation Act, lack of jurisdiction, failure to state a claim,
3 statute of limitations, claims of forgery, fraud and perjury. Defendant even proved in the
4 motion to dismiss that every item Defendant did state in the 352nd and 2015 case was
5 the absolute truth. Most items were made by government agencies and even Plaintiff.
6

7 Plaintiff included forged documents in their reply. The main forged document was an
8 alleged email from the head of USDA. In 2011 the main USDA veterinarian stated
9 Plaintiff Lollar caused bats “pain, suffering, death, violated the Animal Welfare Act” in a
10 verified email. The forged email was from the head of the USDA allegedly in 2013 two
11 years after Plaintiff lost their USDA permit. The alleged email cleared Plaintiff of wrong
12 doing two years after their permit was cancelled by the USDA after the main
13 veterinarian stated Plaintiff committed “animal cruelty.” Plaintiff Lollar made three
14 different version of the same forged email all slightly different. USDA stated that email
15 never existed. All the while Plaintiff claimed Defendant forged all of the documents
16 Defendant posted online. Defendant never forged any document. Plaintiff finally
17 admitted this in trial yet still states this online.
18

19 Plaintiff Lollar included many more forged exhibits in the 2015-002259-2 cause.
20 Defendant proved every single exhibit was forged! Some exhibits didn’t exist. Others
21 existed many years in the past and Plaintiff removed or changed the dates to be within
22 statute of limitations. Plaintiff Lollar’s Affidavit was under oath stating all exhibits were
23 real which was totally false.
24
25

1 In the 352-248169-10 case Plaintiff and their attorney have been abusing discovery
2 for years now. Judge John Chupp is in charge of that case as Judge Pittman recused
3 himself.

4 Plaintiff's attorney Randy Turner changed Judge John Chupp's signed bank
5 authorization order changing the dates. Turner then called up the bank and threatened
6 the clerks demanding third party records which were specifically not included in the
7 order. Turner also demanded records outside the time allowed by the order. Those
8 records were specifically denied in the hearing. Defendant warned Judge Chupp Turner
9 would do exactly this as he'd been doing it for five years. Judge Chupp stated "If he
10 does that, I'll lock him up for a very long time. (To Turner) You're not gonna do that, are
11 you?" Mr Turner (Plaintiff's attorney): "Of course not." Defendant told Judge Chupp
12 Turner would violate the bank authorization. Chupp stated "If they violate the order, they
13 will be in big trouble."

14 Plaintiff's attorney Randy Turner through trickery, fraud and threat of lawsuits and jail
15 stole bank records of an unrelated third party. Turner also stole records outside of the
16 time allowed by the court order. Turner then bragged in a signed fax that he obtained
17 and possessed the records. Police reports were filed by the bank and third parties. The
18 bank demanded that Turner never use, share the records and must return the records
19 to which he was not entitled. The records contain the name, home address, phone
20 number, bank account numbers, routing numbers, signatures, credit card/debit card
21 numbers of thousands of second parties of the third unrelated parties. Turner refused to
22 return the stolen bank records. Instead Turner tried to use the records obtained under a
23 protective order in another case. This was specifically denied in the protective order.
24
25

1 These motions for contempt are pending. Turner stole the bank records from Fort
2 Worth, Texas to banks in Beverly Hills and Los Angeles, California. This is an interstate
3 crime and bank is contacting the proper federal authorities.

4 Defendant notified Judge Jennifer Rymell and Judge John Chupp of these actions.
5 Defendant is sure these crimes are probably the reason why Judge Rymell decided to
6 recuse herself from this mess in this case without being asked. Defendant feels Judge
7 Evans needs to take a very close look at these cases and the behavior of Plaintiff's
8 attorney Randy Turner. The case should not be assigned to another Judge but
9 dismissed due to lack of jurisdiction besides fraud, forgery, perjury and theft.

10
11 Plaintiff and Plaintiff's attorney Randy Turner have committed the crimes of forgery,
12 perjury, theft, identity theft and fraud. They have unclean hands. The only sanction
13 which is feasible is dismissal of the fraudulent, frivolous, meritless 352-248169-10 and
14 2015-002259-2 causes and judgment. All costs, fees, damages should be awarded to
15 Defendant. Plaintiffs must be prosecuted for their crimes. Plaintiff's attorney Randy
16 Turner must be disbarred immediately.

17
18 Defendant believes Randy Turner is having a mental breakdown and needs
19 immediate psychiatric help. Turner filed a motion to strike his own expert witness calling
20 his own expert every nasty name in the book and destroying the expert's reputation.
21 Even after Defendant told Turner this Turner still set the hearing and refused to strike
22 his motion. Turner calls Defendant by the names of his wife and client. Turner must be
23 disbarred immediately.

24 ///

25 ///

1 **ARGUMENT**

2 Plaintiffs and their attorney have unclean hands. They have committed crimes and
3 must be prosecuted. The only sanction available is dismissal and reversal of these
4 cases, judgement.

5 **PRAYER**

6 Defendant respectfully requests that 352-248169-10, 2005-002259-2 be dismissed
7 and judgment reversed. Defendant requests all costs, fees. Defendant requests that
8 Plaintiffs be prosecuted for their crimes and Plaintiff's attorney Randy Turner be
9 disbarred immediately, and any other costs, fees available to defendant.

10 Respectfully submitted,

11
12 
13

14 Mary Cummins, Defendant Pro se
15 645 W 9th St, #110-140
16 Los Angeles, CA 90015-1640
17 Phone 310-877-4770
18 Email: mmmaryinla@aol.com
19 Date February 23rd, 2016
20
21
22
23
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25

1
2 **CERTIFICATE OF SERVICE**

3 I, Mary Cummins, hereby certify that a TRUE COPY of the above **DEFENDANT'S**
4 **NOTICE TO ADMINISTRATIVE JUDGE DAVID EVANS** was served on the Plaintiffs'
Attorney of record by efiletexas.gov at

5 **Randy Turner**
6 **Law Offices of Randall E. Turner, PLLC**
4255 Bryant Irvin Rd. Suite 210
7 Fort Worth, TX 76109
Tel.: 817-420-9690
8 Fax: 817-887-5717
randy@randyturner.com
9 this 23RD Day of February 2016

10 

11 _____
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