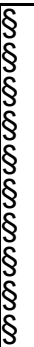


Cause No. 2015-002259-2

<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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**UNOPPOSED AMENDED MOTION TO DISMISS PLAINTIFF’S PETITION  
PURSUANT TO THE TEXAS CITIZEN PARTICIPATION ACT, DEFAMATION  
MITIGATION ACT**

TO THE HONORABLE JENNIFER RYMELL  
COUNTY COURT AT LAW NO. 2 JUDGE:

Pursuant to Sections 27.003(a) and 73.051 of the Texas Civil Practice and Remedies Code, Defendant Pro Se Mary Cummins (“Cummins”), files this Amended Motion to Dismiss Plaintiff’s Petition and requests that the Court dismiss all claims in Plaintiff’s Petition with prejudice, as fully explained in her attached Amended Brief in Support of Motion to Dismiss. Pursuant to Section 27.004 of the Texas Civil Practice and Remedies Code, Cummins requests that the Court set a hearing on the Motion to Dismiss Plaintiff’s Petition. As Cummins is a disabled indigent out of state pro se Defendant Cummins requests to appear by phone. Cummins further reserves the right to make a later motion for her costs, fees, and other expenses incurred in defending against Plaintiff’s Petition pursuant to Section 27.009 of the Texas Civil Practice and Remedies Code.

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Respectfully submitted,

Mary Cummins, Defendant Pro se  
645 W 9th St, #110-140  
Los Angeles, CA 90015-1640  
Phone 310-877-4770  
Email: mmmaryinla@aol.com  
Date February 7, 2016



By: \_\_\_\_\_

Mary Cummins, Defendant Pro Se

1  
2 **CERTIFICATE OF CONFERENCE**

3 February 3, 2016 and February 8, 2016 I sent a letter, notice to the court and Randy  
4 Turner stating I will be filing an amended motion to dismiss with all exhibits necessary  
5 for the February 16, 2016 hearing before the hearing. I received no reply or opposition.

6 **CERTIFICATE OF SERVICE**

7 I, Mary Cummins, hereby certify that a TRUE COPY of the above **DEFENDANT'S**  
8 **MOTION TO DISMISS PLAINTIFF'S PETITION PURSUANT TO THE TEXAS**  
9 **CITIZENS PARTICIPATION ACT, DEFAMATION MITIGATION ACT** was served on  
10 the Plaintiffs' Attorney of record by efiletexas.gov at

11 **Randy Turner**  
12 **Law Offices of Randall E. Turner, PLLC**  
13 4255 Bryant Irvin Rd. Suite 210  
14 Fort Worth, TX 76109  
15 Tel.: 817-420-9690  
16 Fax: 817-887-5717  
17 randy@randyturner.com  
18 this 7<sup>th</sup> Day of February 2016

19 

20 \_\_\_\_\_  
21 Mary Cummins, Defendant Pro se  
22 645 W 9<sup>th</sup> St, #110-140  
23 Los Angeles, CA 90015-1640  
24 Phone 310-877-4770  
25 Email: [mmmaryinla@aol.com](mailto:mmmaryinla@aol.com)