

BAT WORLD SANCTUARY and
AMANDA LOLLAR,

Plaintiffs,

vs.

MARY CUMMINS,

Defendant Pro se

§ IN THE DISTRICT COURT

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TARRANT COUNTY, TEXAS

352nd JUDICIAL DISTRICT

**AMENDED OBJECTION TO PLAINTIFFS' MOTION FOR CONTEMPT OF COURT
AND TO STRIKE PLEADINGS**

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes the Defendant Mary Cummins, Defendant Pro se, movant herein and requests that Plaintiffs' motion for contempt and to strike pleadings be denied. Movant will show the Court the following:

I.

On January 10, 2012 this Court signed an order for Defendant to pay \$100 per day until Defendant disclosed her home address to Plaintiffs' attorney under seal. Defendant moved as soon as she returned to Los Angeles staying with a friend.

On February 9, 2012 this Court heard Defendant's motion to reconsider plaintiffs' motion for contempt. Defendant was under the impression that her home address could be protected because there was a confidentiality agreement with her landlord. Court did not agree and ordered Defendant to turn over her home address.

After returning home Defendant then contacted the court coordinator asking for clarification on the order but did not hear back. Finally on February 13, 2012 Defendant called the court and found out that Linda Blair was out of town. Defendant asked


1 substitute court coordinator Doris to ask the Judge for clarification. Doris then sent an
2 email to Defendant and Plaintiffs' attorney Randy Turner stating that Defendant must
3 give the current address to Turner (Exhibit 1). Defendant received this email February
4 14, 2012 then complied and gave Turner the address in the early morning of February
5 18, 2012 four days later. Defendant also notified the court that she complied with the
6 order and was no longer in contempt (Exhibits 2, 3). Defendant was under the
7 assumption she was no longer in contempt as evidenced by her email to the court. No
8 one has ever asked Defendant to pay any sanction. Plaintiffs filed a motion for criminal
9 contempt which has not been heard. Defendant who is pro se and not a lawyer was
10 under the impression that the sanctions would be dealt with at that hearing. Defendant
11 does not have the money to pay for sanctions. Defendant has no assets and cannot
12 secure a loan.

13 WHEREFORE, PREMISES CONSIDERED, Defendant requests that this court deny
14 Plaintiffs' motion for contempt and to strike pleadings, and order Plaintiffs to pay all
15 travel expenses and associated costs and for such other and further relief as may be
16 equitable in law or in equity.

17 Respectfully submitted,

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

24 By:


25 Mary Cummins, Defendant Pro Se

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CERTIFICATE OF SERVICE

I, Mary Cummins, hereby certify that a TRUE COPY of the above **OBJECTION TO MOTION FOR CONTEMPT AND TO STRIKE PLEADINGS** was served on the Plaintiffs' Attorney of record by FAX and by FIRST CLASS MAIL at
Randy Turner
Bailey & Galyen
1901 W. Airport Freeway
Bedford, TX 76021
Fax: 817-545-3677
this 18th Day of April, 2012



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

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IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

352nd JUDICIAL DISTRICT

FIAT

Defendant's AMENDED OBJECTION TO MOTION FOR CONTEMPT AND TO STRIKE PLEADINGS was filed on April 18, 2012. Defendant requests that the foregoing be set for hearing.

IT IS THEREFORE ORDERED that a hearing before this court on said Motion be set for the _____ day of _____ at _____ a.m./p.m. in the 352nd District Court of Tarrant County, Fort Worth, Texas.

Date _____

Judge Presiding