

FILED

1 MARY CUMMINS  
2 Plaintiff  
3 645 W. 9th St. #110-140  
4 Los Angeles, CA 90015  
5 In Pro Per  
6 Telephone: (310) 877-4770  
7 Email: mmmaryinla@aol.com

2013 MAY 20 PM 12:07

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY: 

8 UNITED STATES DISTRICT COURT  
9  
10 CENTRAL DISTRICT OF CALIFORNIA

MS  
I

11 MARY CUMMINS  
12 Plaintiff

13 v.

14 ERIC SHUPPS  
15 Defendant

) Case No. CV11 08081 BRO (MANx)

) **FOURTH AMENDED**  
) **COMPLAINT FOR DAMAGES**

) (Interference with Business Relations,  
) Interference with Prospective Economic  
) Advantage)

) **DEMAND FOR JURY TRIAL**

16 Plaintiff Mary Cummins, (hereinafter "Plaintiff") alleges as follows:

17  
18 **INTRODUCTION**

19  
20  
21 1. This is a diversity action against Defendant Eric Shupps, asserting claims for  
22 intentional interference with business relations and prospective economic advantage.  
23 Plaintiff's action arises out of Defendant Eric Shupps (hereinafter "Defendant")  
24 posting on the Internet knowingly false and fraudulent statements about Plaintiff and  
25 other misconduct resulting in financial damage, public ridicule and emotional distress.  
26 Plaintiff incorporates her Declaration attached to this complaint as part of the  
27 complaint.

28 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**JURISDICTION**

2. This court has subject matter jurisdiction based on complete diversity of citizenship pursuant to 28 U.S.C. §1332. Damages resulting from the matter exceed \$75,000 exclusive of costs.

**VENUE**

3. Venue in this district is proper under 28 U.S.C. §1391(a) because a substantial part of the events or omissions giving rise to the damages occurred in this district in Los Angeles County and Plaintiff lives in this district.

**PARTIES**

4. Plaintiff Mary Cummins is an individual, a resident, a citizen and a licensed real estate appraiser doing business in Los Angeles County, California.

5. Plaintiff is associated with Animal Advocates, a non-profit corporation with a principal place of business in Los Angeles County, California.

6. Defendant Eric Shupps is a resident of Fort Worth, Texas.

**STATEMENT OF FACTS**

7. Plaintiff is the founder of non-profit organization Animal Advocates located in California. Plaintiff is permitted under license by the United States Department of Agriculture (USDA) and the California Department of Fish & Game (CADFG) to possess, rescue and rehabilitate ill, injured and orphaned native wildlife for release back to the wild. Plaintiff is trained, experienced and permitted under licenses to care for coyotes, bobcats, foxes, raccoons, opossums, skunks and all other small mammals including bats.

8. Plaintiff has published CADFG approved manuals on wildlife rehabilitation and instructs CADFG accredited classes to wildlife rehabilitators, veterinarians and animal care professionals.

9. Plaintiff has been trained at the Rio Hondo Police Academy and the California State Humane Association Animal Law Enforcement Academy to investigate animal

1 cruelty and neglect. Plaintiff is currently on the Humane Society of the United States  
2 (HSUS) National Disaster Animal Response Team which handles animal cruelty and  
3 neglect cases.

4 10. Plaintiff is a licensed real estate appraiser and expert witness in Los Angeles,  
5 California.

6 11. Plaintiff's greatest asset is Plaintiff's personal business reputation and the  
7 Defendant alleged herein has made every effort to destroy Plaintiff's reputation and  
8 ability to get work and earn a living.

9 12. Defendant was an expert witness paid by Defendants Amanda Lollar and Bat  
10 World Sanctuary. Defendant stated he is an expert in Search Engine Optimization in a  
11 case involving Plaintiff in Texas. The defamatory items and images which Shupps  
12 posted on the Internet about Plaintiff were not part of that case. They were posted after  
13 the case ended. Most of the items have absolutely nothing to do with the case or his  
14 testimony and are only about Plaintiff. Plaintiff believes that Defendants Amanda  
15 Lollar and Bat World Sanctuary may have paid him to make some of the blogs, images  
16 and websites. Discovery has not yet commenced in regard to newly known John Doe  
17 defendant Eric Shupps.

18 13. Defendant has posted defamatory comments and articles about Plaintiff on  
19 the Internet. Defendant has falsely posted the following statements;

- 20 • Mary Cummins shows you "how to commit defamation without getting  
21 caught."
- 22 • "Mary Cummins is charged with criminal contempt of court."
- 23 • "Mary Cummins uses googlebombs to spread defamation: [http://](http://marycumminsgooglebomb.com)  
24 [marycumminsgooglebomb.com](http://marycumminsgooglebomb.com)."
- 25 • "Mary Cummins admits to being involved over 20 lawsuits and being sued 4  
26 times for defamation: <http://marycumminslosttorandyturnerattorney.com>." "Cummins  
27 posted online that plaintiffs had LOST their motion for sanctions. Say what? Guess  
28

1 that wasn't an accurate representation of the proceedings, now was it? But then, it's  
2 become quite obvious that Mary just isn't all that good with the truth."

3 14. Defendant posted a graphic image on <http://marycumminsgooglebomb.com>  
4 that purports to demonstrate that Plaintiff posted supposedly defamatory articles about  
5 others on many different websites and blogs.

6 15. All of these statements and more are false and were intentionally made with  
7 malicious intent to destroy the personal and business reputation of Plaintiff, and to  
8 destroy Plaintiff's relationship with business contacts besides cause emotional distress.  
9 Here are but a few specific examples;

10 15 a. On July 7, 2012 Defendant posted on Twitter as user @eshupps "how to  
11 commit defamation without getting caught" and "ME: unfucking believable" (Exhibit  
12 1).

13 15 b. On July 9, 2012 Defendant posted on Twitter as user @CitizenWatcher1  
14 "Mary Cummins is charged with criminal contempt of court" (Exhibit 1).

15 15 c. July 6, 2012 Defendant posted on Twitter as user @truthaboutmary "Mary  
16 Cummins uses googlebombs to spread defamation: [http://](http://marycumminsgooglebomb.com)  
17 [marycumminsgooglebomb.com](http://marycumminsgooglebomb.com)" also at [http://](http://marycumminsgooglebomb.batworld.org/)  
18 [marycumminsgooglebomb.batworld.org/](http://marycumminsgooglebomb.batworld.org/) (Exhibit 1).

19 15 d. July 6, 2012 Defendant posted on Twitter as user @truthaboutmary "Mary  
20 Cummins admits to being involved in over 20 lawsuits and being sued 4 times for  
21 defamation: <http://marycumminslosttorandyturnerattorney.com> " (Exhibit 1).

22 15 e. August 23, 2012 Defendant posted on <http://truthaboutmary.wordpress.com>  
23 "Cummins posted online that plaintiffs had LOST their motion for sanctions. Say  
24 what? Guess that wasn't an accurate representation of the proceedings, now was it?  
25 But then, it's become quite obvious that Mary just isn't all that good with the  
26 truth" (Exhibit 1).

1           16. All of the above statements of facts made by Defendant are completely  
2 untrue. Many more defamatory statements were made by Defendant but discovery has  
3 not yet commenced in regard to Defendant Eric Shupps. Positive identification of the  
4 as yet anonymous users is not possible at this time. Previously he was an unknown  
5 John Doe until subpoena showed his identify. Plaintiff needs to send subpoenas to  
6 other blog hosts in order to get positive identification as the author of those blogs.  
7 Every week Defendant is creating new defamatory blogs and websites about Plaintiff.

8           17. Defendant's statements are not protected freedom of speech. The statements  
9 are still online to this day. Defendant did not remove them even after being notified in  
10 writing that they were false and defamatory. They were posted with malice as  
11 Defendant knew they were not true.

12           18. Defendant did not make these statements in court or as an expert witness in  
13 the Texas case. The statements are therefore not privileged. Defendant made and  
14 posted these statements and the diagram as a private individual after the case  
15 concluded. They are therefore not protected.

16           19. Defendant's libel and defamation per se are harming Plaintiff's business  
17 relations and causing injury to Plaintiff's existing and future economic relationships  
18 besides inflicting emotional distress.

19           20. Defendant was sent two cease and desist emails (Exhibits 2, 3) asking that he  
20 remove his defamation. Plaintiff threatened to sue Defendant for defamation if he did  
21 not remove his defamation. Defendant never removed his defamation and Plaintiff was  
22 forced to sue him.

23           21. Subpoena results from WordPress and Google revealed the identity of the  
24 Twitter user names to be Eric Shupps, IP address 66.182.229.170, email address  
25 truthaboutmary@hotmail.com, zip code of user 76020, area code of user 817 which  
26 match Defendant's identifying information. Eric Shupps made and posted the blog  
27 truthaboutmary.wordpress.com He also made and posted blogs, images, websites for  
28

1 Amanda Lollar and Bat World Sanctuary which are hosted in Amanda Lollar and Bat  
2 World Sanctuary's website i.e. <http://marycumminsgooglebomb.batworld.org/>  
3 Batworld.org is owned and also controlled by Defendants Amanda Lollar and Bat  
4 World Sanctuary.

5 22. Defendant Shupps stated he's a search engine optimization expert. He  
6 intentionally put the name "Mary Cummins" in the title of the blog, title of posts, body  
7 of posts, in keywords, image names and links. He added the name of Plaintiff's non-  
8 profit organization "Animal Advocates," her real estate company "Cummins Real  
9 Estate," the main keywords someone would use in a search for a real estate appraiser  
10 in Los Angeles, i.e. "real estate," "appraiser," "appraisal," "los angeles," "California..."  
11 to the blogs and posts in the same way. This would cause anyone searching the Internet  
12 for a real estate appraiser in Los Angeles to end up at Shupps' blogs instead of  
13 Plaintiff's websites. If you search for the name "Mary Cummins" the top search engine  
14 results are blogs and websites made by Shupps (Exhibit 4). The Internet is the main  
15 way real estate appraisers get work today. Plaintiff's appraisal package is on the  
16 Internet. This is how Plaintiff gets 99% of all work. This is also how Plaintiff's ex-  
17 employer In Defense of Animals found Shupps' blog (Exhibit 5) and then fired  
18 Plaintiff. In Defense of Animals stated in writing Shupps' blog is the reason Plaintiff  
19 was fired. Plaintiff cannot possibly get a job because nowadays 75% of all employers  
20 Google search people<sup>1</sup>. More than 70% of employers admit they have decided not to  
21 hire someone based on what they found online about the person<sup>2</sup>. Plaintiff no longer  
22 tells people her last name for this reason. Plaintiff has to work through an intermediary  
23 because she can't get work in her own name.

24 23. Defendant intentionally added links to his blogs which go to other websites  
25 and blogs which state Plaintiff is a "convicted criminal," there's "a bench warrant out  
26

27 <sup>1</sup> <http://money.usnews.com/money/blogs/outside-voices-careers/2011/03/30/how-to-improve-your-online-identity>

28 <sup>2</sup> [http://blogs.hbr.org/cs/2012/04/your\\_future\\_employer\\_is\\_watchi.html](http://blogs.hbr.org/cs/2012/04/your_future_employer_is_watchi.html)

1 for her arrest," Plaintiff was "picked up by the police," Plaintiff "ass raped a baby  
2 skunk at a sex party in the Hollywood hills until it bled to death," Plaintiff "commits  
3 animal cruelty," Plaintiff was found "guilty of credit card, forgery, fraud and theft"  
4 besides other completely false things. Plaintiff sent a cease and desist to Shupps stating  
5 these things are false yet he did not remove the links. He posts the links in his blog  
6 stating they are facts.

7 24. After Plaintiff added Defendant Shupps in this case Plaintiff received an  
8 "anonymous" email (Exhibit 6) stating "SOMEONE WHO HAS POSTED BAD  
9 THINGS ABOUT YOU HAS AGREED TO DISMANTLE ALL THE NEGATIVE  
10 STUFF ON-LINE ABOUT YOU IF YOU DO THE SAME FIRST THE BLOGGING  
11 HAS RUINED YOUR LIFE FINANCIALLY BUT YOU CAN TAKE THIS STEP TO  
12 MUTUALLY GET RID OF ALL THE NEGATIVE STUFF WHEN YOUR  
13 NEGATIVE CRAP LEAVES THE WEB SO WILL THEIRS." Plaintiff believes  
14 Shupps sent this email. Plaintiff responded to Shupps about the offer (Exhibit 7).  
15 Defendant did not reply most likely for fear that he would be identified as the user who  
16 made the defamatory posts and admitted to causing damage to Plaintiff.

17 25. Plaintiff believes that Defendant Shupps defamed Plaintiff on the Internet in  
18 retaliation for Plaintiff posting her pre-trial brief<sup>3</sup> July 2012 which included a move to  
19 strike Shupps as an expert witness because he did not meet Texas Rules of Evidence  
20 702. The brief proved that Shupps lacks any education, is not an expert, has never been  
21 as expert before, the software he used is flawed and his analysis is extremely flawed.

22 **CLAIM ONE**

23 (Intentional Interference with Business Relations)  
24 (California Business and Professions Code § 17200)

25 Plaintiff realleges and incorporates herein the allegations of paragraphs 1  
26 through 25 of this complaint, as though fully set forth herein.

27  
28 <sup>3</sup> [http://www.animaladvocates.us/batWorldLawsuit/defendant\\_trial\\_brief.pdf](http://www.animaladvocates.us/batWorldLawsuit/defendant_trial_brief.pdf) pg 5

1 Plaintiff has a real estate appraisal business and non-profit organization.

2 Tortious interference of business relations, i.e. when false claims and  
3 accusations are made against a business or an individual's reputation in order to drive  
4 business away.

5 Plaintiff and In Defense of Animals were in an economic relationship that would  
6 have resulted in an economic benefit to Plaintiff. Plaintiff was trying to get and was  
7 getting work as a real estate appraiser from the Internet.

8 Defendant knew that Plaintiff was getting work, trying to get work from the  
9 result of Google search results on the Internet;

10 Defendant intended to disrupt the relationship with current and future  
11 employers, clients;

12 Defendant engaged in wrongful conduct through defamation, libel,  
13 misrepresentation of Plaintiff;

14 The relationships were disrupted;

15 Plaintiff was harmed; and

16 Defendant's wrongful conduct was a substantial factor in causing Plaintiff's  
17 harm..

18 **CLAIM TWO**

19 (Intentional Interference with Prospective Economic Advantage)  
20 (California Business and Professions Code § 17200)

21 Plaintiff realleges and incorporates herein the allegations of paragraphs 1  
22 through 25 of this complaint, as though fully set forth herein.

23 Defendant's wrongful conduct is a substantial factor in causing injury to  
24 Plaintiff's existing and future economic relationships. Again, Plaintiff was fired from  
25 employment because of Defendant's defamation in his blog. Plaintiff has lost business  
26 because of this defamation. Plaintiff has not been able to get new business because of  
27 his blog.

28



1 described above to remain on the Internet, be reposted on the Internet or  
2 communicated in any form.

3 **PRAYER FOR RELIEF**

4 Wherefore, Plaintiff prays for judgment against Defendant for:

5 General and special damages, in an amount to be determined at trial;

6 Economic loss and loss of other benefits due as a result of defendants' wrongful  
7 conduct in the amount of \$250,000;

8 Damages of pain, suffering and emotional distress, in an amount to be  
9 determined at trial;

10 Exemplary and punitive damages;

11 Reasonable costs of suit and attorney fees if any; and

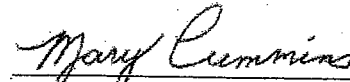
12 Such other relief as the Court may deem just and proper.

13

14

Respectfully submitted,

15



16

Mary Cummins, Plaintiff

17

Dated: May 20, 2013

18

645 W. 9th St. #110-140

19

Los Angeles, CA 90015

20

In Pro Per

21

Telephone: (310) 877-4770

22

23

24

25

26

27

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

PROOF OF SERVICE BY MAIL  
(FRCivP 5 (b)) or  
(CCP 1013a, 2015.5) or  
(FRAP 25 (d))

I am Plaintiff in pro per whose address is 645 W. 9th St. #110-140, Los Angeles, California 90015-1640. I am over the age of eighteen years.

I further declare that on the date hereof I served a copy of:

**PLAINTIFF'S FOURTH AMENDED COMPLAINT**

on the following interested parties by placing a true copy thereof enclosed in a sealed envelope addressed as follows for collection and mailing at 645 W. 9th St. #110-140, Los Angeles, CA 90015-1640.

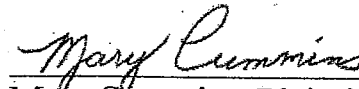
Dean A. Rocco  
Jackson Lewis LLP  
725 S. Figueroa, # 2500  
Los Angeles, CA 90017

Sandra McMullen  
Jackson Lewis LLP  
725 S. Figueroa, #2500  
Los Angeles, CA 90017

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed this day, May 19, 2013, at Los Angeles, California.

Respectfully submitted,

  
Mary Cummins, Plaintiff  
Dated: May 19, 2013  
645 W. 9th St. #110-140  
Los Angeles, CA 90015

**DECLARATION OF PLAINTIFF MARY CUMMINS**

I, MARY CUMMINS, declare as follows:

1. I am Mary Cummins Plaintiff in pro per. I make this declaration on my personal knowledge of the facts set forth herein.
2. Attached to PLAINTIFF’S FOURTH AMENDED COMPLAINT as Exhibit 1 is a true and correct copy of tweets and posts Defendant Shupps made on the Internet.
3. Attached to PLAINTIFF’S FOURTH AMENDED COMPLAINT as Exhibit 2 is a true and correct copy of a cease and desist email I sent to Defendant Shupps .
4. Attached to PLAINTIFF’S FOURTH AMENDED COMPLAINT as Exhibit 3 is a true and correct copy of a cease and desist email I sent to Defendant Shupps.
5. Attached to PLAINTIFF’S FOURTH AMENDED COMPLAINT as Exhibit 4 is a true and correct copy of a print out from a Google search for the words “mary cummins real estate.” Shupps’ website “truthaboutmary” pulls up third.
6. Attached to PLAINTIFF’S FOURTH AMENDED COMPLAINT as Exhibit 5 is a true and correct copy of an email professor Dr. Allen Rutberg of the Cummings School of Veterinary Medicine sent to Barbara Stagno of In Defense of Animals.
7. Attached to PLAINTIFF’S FOURTH AMENDED COMPLAINT as Exhibit 6 is a true and correct copy of an email I received from someone who stated “blogging has ruined your life financially.”
8. Attached to PLAINTIFF’S FOURTH AMENDED COMPLAINT as Exhibit 7 is a true and correct copy of an email I sent to Defendants Shupps, Lollar and their lawyers Rocco and Turner.
9. Immediately after Dr. Allen Rutberg sent the email to Barbara Stagno I was fired from In Defense of Animals by the CEO Joe Haptas.


- 1 10. Joe Haptas told me I was fired because of what he read in Defendant Shupps'
- 2 blog. I told Joe that what Shupps wrote was not true but Joe said he didn't care.
- 3 He did not want In Defense of Animals to be associated with anyone that had
- 4 such things posted about them on the Internet.
- 5 11. I have lost other jobs and work because of Shupps' defamatory blogs.
- 6 12. I have been harmed financially. I have lost income.
- 7 13. All of these blogs with these links and posts are still online to this day.

8 I, declare under penalty of perjury under the laws of the State of California that the  
9 foregoing is true and correct.

10 Executed on May 19, 2013 at Los Angeles, California.

11  
12 By: Mary Cummins  
13 MARY CUMMINS

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

7 Jul  Eric Shupps @eshupps

RT @lovescotch: @truthaboutmary @MMMaryInLA how to commit defamation without getting caught  
[laanimalpals.blogspot.com/2006/11/mary-c...](http://laanimalpals.blogspot.com/2006/11/mary-c...) "ME: unfucking believable"

15 Jul  Citizen Watcher @Citizen Watcher1

@MMMaryInLA Mary Cummins is charged with criminal contempt of court: [batworld.org/wp-content/upl...](http://batworld.org/wp-content/upl...)

6 Jul  Sun Tzu @truthaboutmary

@MMMaryInLA Mary Cummins uses googlebombs to spread defamation: [marycumminsgooglebomb.com](http://marycumminsgooglebomb.com)

6 Jul  Sun Tzu @truthaboutmary

@MMMaryInLA Mary Cummins admits to being involved over 20 lawsuits and being sued 4 times for defamation: [cumminslostforandyturnerattorney.com](http://cumminslostforandyturnerattorney.com)

that check. Of course, immediately after the hearing in which the sanctions were found to be justified, Mary Cummins posted online that the plaintiffs had LOST their motion for sanctions. Say what? Guess that wasn't an accurate representation of the proceedings, now was it? But then, it's become quite obvious that Mary just isn't all that good with the truth.

6 Jul  Sun Tzu @truthaboutmary

@MMMaryInLA Mary Cummins tells how to commit defamation without getting caught (guess it didn't work this time): [laanimalpals.blogspot.com/2006/11/mary-c...](http://laanimalpals.blogspot.com/2006/11/mary-c...)

Exhibit 1

From: Mary Cummins <mmmaryinla@aol.com>  
Subject: **CEASE AND DESIST - Cummins v Lollar**  
Date: June 25, 2012 7:57:38 AM PDT  
To: Stephen MacPhail <smacphail@braggkuluva.com>, sanctuary@batworld.org, eshupps@binarywave.com, Randy Turner <rtturner@galyen.com>  
2 Attachments, 73.4 KB



I just saw this libelous and defamatory page on the Internet. You, Mr. Shupps, know that it's impossible to "Google bomb." Google changed their algorithm in 2007. I did not Google bomb. You are basically accusing me of illegally spamming the search engine. Please, cease and desist from making this totally false accusation. This is directed to Amanda Lollar as well. She posted this. I got a notice from the court reporter few days ago that she requested the transcript. I was just alerted to this website by a bot.

<http://marycumminsgooglebomb.com>

Mr. Shupps, what you are claiming in your diagram is completely incorrect. You have absolutely no idea what you are talking about. Remember, you've never been an expert witness before. You admitted that in court. You've never given court or deposition testimony before this case. You've never used that authorship software before for a paying client. I spoke with the person who wrote the software. It is in beta and has severe limitations with multiple authors and closed attribution. It is not supposed to be used for legal cases because it cannot tell you who wrote an article. You'd previously stated there is no way to know who wrote the articles, remember? I didn't write them. I didn't even write the samples you attributed to me. Garbage in, garbage out. Please, remove this garbage. I am currently suing Lollar for libel, defamation in California.

I've attached communication from the author of the software. It cannot be used for legal cases.



[jgaap \(68.0 KB\)](#)

Mary Cummins  
[MMMARYinLA@AOL.COM](mailto:MMMARYinLA@AOL.COM)



Exhibit 2

From: Mary Cummins <MMMARYinLA@AOL.COM>  
Subject: **Cease and desist - Cummins v Lollar - CV-11 08081**  
Date: July 6, 2012 8:42:35 AM PDT  
To: eshupps@binarywave.com, sanctuary@batworld.org, Randy Turner <rturner@galyen.com>, Stephen MacPhail <smacphail@braggkuluva.com>  
\* 1 Attachment, 5.4 KB



Please, cease and desist from posting, tweeting, blogging untrue things about me. You two started this recent activity by posting false and negative items about me. I did not Google Bomb. Please, look up the definition of the word. It's not even technically possible besides the fact that I didn't post a bunch of links. Shupps did not prove I wrote those articles. Read the transcript. I didn't write them. It's also extremely obvious that I did not post those items on workingtohelpanimalstodaytomorrow. They copy/pasted a couple of paragraphs from my website and added their own comments. Everyone knows who owns that blog and it's clearly not me. Their name is right there. That blog has been around a while and covers topics I don't even mention. I never use obscenities like that Blogger. I'm also not anti-pitbull. That Blogger has been posting negatively about Turner since he represented the fake war veteran which was before I ever heard his name.

If you choose to continue to post and tweet falsely about me, I will continue to counter everything with the truth.

Mary Cummins  
[MMMARYinLA@AOL.COM](mailto:MMMARYinLA@AOL.COM)



Exhibit 3

Mary Search Images Maps Play YouTube News Gmail Drive Calendar More



mary cummins real estate

Mary C

Share



Web Images Maps Shopping More Search tools

SafeSearch



About 268,000 results (0.41 seconds)

**Mary Cummins - Cummins Real Estate Services, appraiser ...**

www.marycummins.com/

Mary Cummins, Residential and residential income real estate appraiser appraisal in Los Angeles, California.

You +1'd this

**"Mary Cummins" - President of Animal Advocates, Cummins Real ...**

www.animaladvocates.us/mary\_cummins\_biography.htm

After college Mary Cummins became a licensed real estate agent specializing in income property in Los Angeles. Mary Cummins obtained her real estate ...

You +1'd this



**Truth About Mary | Exposing the truth about Mary Cummins of ...**

truthaboutmary.wordpress.com/

Jul 9, 2012 - Mary Cummins Has Trouble With The Truth: Real Estate Licenses. Mary Cummins has a lot of difficulty keeping all her stories straight.

**Mary Cummins Animal Advocates Cummins Real Estate Services ...**

www.mary-cummins.org/

Mary Cummins is the President of Animal Advocates and Cummins Real Estate Services in Los Angeles, California - Biography, Resume, About, Curriculum ...

**Mary Cummins profiles | LinkedIn**

www.linkedin.com/pub/dir/Mary/Cummins

Curriculum vitae of Mary Cummins, Cummins Real Estate Services http://www.marycummins.com/marycumminscurriculumvitae.pdf Curriculum vitae of Mary ...

**Mary Cummins | LinkedIn**

www.linkedin.com/in/marycummins

Greater Los Angeles Area - Mary Cummins Real Estate Appraiser  
I accept all connections from animal lovers, vegans/vegetarians or people in real estate.  
Mary Cummins is President of Animal Advocates. She is licensed with ...

You +1'd this

**Mary Cummins Real Estate Animal Advocates**

marycumminsrealestatemarycummins.blogspot.com/

by Mary Cummins - in 3,813 Google+ circles  
Apr 17, 2013 - Mary Cummins is a real estate appraiser in Los Angeles, California. Mary Cummins has over 28 years of experience in real estate.

You +1'd this

**Mary Cummins Real Estate Animal Advocates: Cummins Real ...**

marycumminsrealestatemarycummins.blogspot.com/.../cummins-real-esta...

by Mary Cummins - in 3,813 Google+ circles  
Apr 17, 2013 - Cummins Real Estate Services Receives 2013 Los Angeles Award Los Angeles Award Program Honors the Achievement LOS ANGELES April ...

**Mary Cummins - Google+**

https://plus.google.com/107575973456452472889

May 10, 2013 - Mary Cummins, Animal Advocates is a licensed real estate appraiser, broker, wildlife rehabilitator in Los Angeles, California. Add a comment.

You +1'd this

Exhibit 4



----- Original Message -----

**From:** Rutberg, Allen

**To:** Barbara Stagno <<mailto:bstagno@optonline.net>>

**Sent:** Monday, October 15, 2012 11:40 AM

**Subject:** Mary Cummins stuff

<http://www.marycumminsbatworld.com/>

<http://www.indybay.org/newsitems/2012/06/15/18715506.php> (response from Mary)

<http://victimsofmisscummins.blogspot.com/>

<http://laanimalwatch.blogspot.com/2007/08/about-mary-cummins.html> (more in her defense)

<http://truthaboutmary.wordpress.com/>

Exhibit 5

From: "Anonymous Remailer (austria)" <mixmaster@remailer.privacy.at>  
Subject: **BLOGGING OFFER**  
Date: August 23, 2012 3:30:59 PM PDT  
To: MMMARYINLA@AOL.COM

---

SOMEONE WHO HAS POSTED BAD THINGS ABOUT YOU HAS AGREED TO DISMANTLE ALL THE NEGATIVE STUFF ON-LINE ABOUT YOU IF YOU DO THE SAME FIRST  
THE BLOGGING HAS RUINED YOUR LIFE FINANCIALLY BUT YOU CAN TAKE THIS STEP TO MUTUALLY GET RID OF ALL THE NEGATIVE STUFF  
WHEN YOUR NEGATIVE CRAP LEAVES THE WEB SO WILL THEIRS

---

Exhibit 6

From: Mary Cummins <MMMARYINLA@AOL.COM>  
Subject: **Cummins v Lollar - Fwd: BLOGGING OFFER**  
Date: August 23, 2012 7:38:21 PM PDT  
To: Randy Turner <rturner@galyen.com>, Dean Rocco <roccod@jacksonlewis.com>, sanctuary@batworld.org, eshupps@binarywave.com  
1 Attachment, 5.4 KB



This can only be Eric Shupps or Amanda Lollar both of whom are defendants in my defamation case. Shupps was recently notified of my WordPress court order. You need to tell me which one of you is making this offer.

Turner, wherever did you find this Internet legal "expert?" He doesn't even know the definition of a Google bomb besides the fact that he's never been an expert before. He also knows nothing of authorship analysis and he used free beta software which specifically states it cannot be used for legal cases. You should ask for your money back.

Begin forwarded message:

**From:** "Anonymous Remailer (austria)" <[mixmaster@remailer.privacy.at](mailto:mixmaster@remailer.privacy.at)>  
**Date:** August 23, 2012 3:30:59 PM PDT  
**To:** [MMMARYINLA@AOL.COM](mailto:MMMARYINLA@AOL.COM)  
**Subject:** **BLOGGING OFFER**

SOMEONE WHO HAS POSTED BAD THINGS ABOUT YOU HAS AGREED TO DISMANTLE ALL THE NEGATIVE STUFF ONLINE ABOUT YOU IF YOU DO THE SAME FIRST  
THE BLOGGING HAS RUINED YOUR LIFE FINANCIALLY BUT YOU CAN TAKE THIS STEP TO MUTUALLY GET RID OF ALL THE NEGATIVE STUFF  
WHEN YOUR NEGATIVE CRAP LEAVES THE WEB SO WILL THEIRS

Mary Cummins  
[MMMARYinLA@AOL.COM](mailto:MMMARYinLA@AOL.COM)



Exhibit 7