

1 MARY CUMMINS
2 Defendant
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5 In Pro Per
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8 SUPERIOR COURT OF CALIFORNIA

9 COUNTY OF LOS ANGELES

10 BAT WORLD SANCTUARY,
11 AMANDA LOLLAR
12 *Plaintiffs*

13 v.

14 MARY CUMMINS
15 *Defendant*

) Case No. BS140207

)
)
) **DEFENDANT'S EMERGENCY EX**
) **PARTE MOTION TO**
) **RECONSIDER DEFENDANT'S**
) **MOTION TO QUASH SUBPOENA;**
) **OBJECTION TO COURT ORDER;**
) **DECLARATION BY DEFENDANT**
) **PRO SE IN SUPPORT THEREOF;**
) **MEMORANDUM OF POINTS AND**
) **AUTHORITIES IN SUPPORT**
) **THEREOF; AND DECLARATION**
) **OF EX PARTE NOTICE**

) **[PROPOSED] ORDER LODGED**
) **HEREWITH**

) **Date: May 30, 2014**
) **Time: 8:30**
) **Dept.: 24**
) **Judge: Robert Hess**

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22 **TO THE ABOVE-ENTITLED COURT AND ALL INTERESTED PARTIES**


23 **HEREIN:** Appearing ex parte, Defendant Pro Se Mary Cummins (hereinafter
24 "Defendant") hereby moves to set aside the ruling made by the Court on May 23, 2014
25 authorizing Plaintiffs to receive via subpoena Defendant's "bank statements" from One
26 West bank. This ex parte motion is based upon the grounds that Judge Robert Hess

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28 **DEFENDANT'S EMERGENCY EX PARTE MOTION TO RECONSIDER DEFENDANT'S MOTION**
TO QUASH SUBPOENA; OBJECTION TO COURT ORDER; DECLARATION BY DEFENDANT
PRO SE IN SUPPORT THEREOF; MEMORANDUM OF POINTS AND AUTHORITIES IN
SUPPORT THEREOF; AND DECLARATION OF EX PARTE NOTICE

1 gave Defendant ten days to object to the May 23, 2014 order. This motion is made ex
2 parte because the Judge approved a subpoena to release the “bank statements” of
3 Defendant which include private confidential protected financial information and data
4 of other people and entities which are not the subject of the sister state judgment which
5 is the basis of this case. If the Court’s ruling is allowed to stand, unrelated people and
6 entities will be permanently harmed by the release of their protected confidential
7 financial information. Plaintiffs also previously requested these exact same documents
8 in post trial discovery and were denied by the court. Plaintiffs also will post these
9 documents online to harass, oppress, embarrass Defendant. Previously Plaintiffs posted
10 Defendant’s ex-attorney’s check online without redacting the attorney’s private
11 confidential financial information.

12 This motion is made pursuant to Code of Civil Procedure (hereinafter “CCP”) §§
13 473(d), and is based upon the accompanying Declaration by Defendant Pro Se, the
14 accompanying Memorandum of Points and Authorities, the accompanying Declaration
15 of Ex Parte Notice, all pleadings and papers on file in the above-captioned action, and
16 other evidence that may be presented by Defendant at the hearing on this motion.

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18 Dated: May 29, 2014

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22 Mary Cummins
23 Defendant Pro Se