

anywhere. This request is overly broad and would include the records of others. Plaintiff is willing to directly give all medical records related to this injury and this part of the body for two years prior to the injury to the present to Defendants if there is a protective order.

5. Request 13 was for a “blank signed employment authorization form.” Plaintiff refused because Plaintiff has not been employed by others in many years and Plaintiff does not seek lost wages. Plaintiff agrees to waive claims to “lost wages.”
6. Plaintiff did not reply to all discovery requests as Plaintiff requested a signed protective order over discovery items, interrogatories and the discovery process **before** she would provide the documents.
7. Plaintiff did state that Plaintiff would provide some of the documents through an attorney. Plaintiff had a few attorneys willing to take the case until they saw Defendants’ attorney Randy Turner’s hate page against Plaintiff (Exhibit 1). Randy Turner with malice defames and libels Plaintiff in this page. Plaintiff has advised Turner a few times that what is posted is false but he refuses to remove it. Turner even states Plaintiff is 59 years old when she is 48 just to make her sound “old.” For this reason Plaintiff is finding it difficult to find an attorney who would be willing to put up with the juvenile antics of Defendant and their attorney Randy Turner.
8. Plaintiff tried to resolve the discovery issues with Defendant. Plaintiff requested a protective order over discovery and Defendants refused (Exhibit 2). Plaintiff hereby requests a protective order.

9. Defendant Lollar has a long history of abusing discovery to harass, oppress, embarrass, annoy, cyberstalk and even commit crimes such as identify theft and bank fraud against Plaintiff and unrelated third parties (Declaration).

a. Example 1. Defendant Lollar used items obtained through protected discovery and regular discovery to steal Plaintiff's identity. Defendant Lollar then used these discovery items, i.e. full legal name, copy of driver's license, social security number, date of birth, mother's maiden name, place of birth to try to illegally access the bank account of Plaintiff and the bank account of an unrelated non-profit. The banks contacted Plaintiff via letter and email (Exhibit 3) then played the recorded audio calls. Plaintiff identified Defendant Lollar's voice and filed a police report (Exhibit 4). Plaintiff was notified by the credit bureaus that someone had used that information to illegally order three credit reports at the same exact time. Defendant Lollar received Plaintiff's SSN which was under a protective order.

b. Example 2. In Plaintiff's previous videotaped deposition questions were intentionally asked with the sole purpose to illicit an unrelated embarrassing or confidential response about taxes, finances, family, relationships, names of friends, permits... Plaintiff had a Texas attorney in that deposition. Defendant Lollar then made over 100 movies which she uploaded to the public Internet on YouTube with the sole intent to harm Plaintiff as much as possible by revealing confidential information about Plaintiff's taxes, lawsuits, family members, problems... (Exhibit 5)¹. Defendant Lollar posted links to the videos all over the Internet and even sent them directly to Plaintiff's friends, family and colleagues with the sole purpose to embarrass Plaintiff.

Defendant made over 350 websites devoted solely to harass, and defame Plaintiff which include

¹ <https://www.youtube.com/user/BWSvMC>

everything from discovery in the last case. Defendant in these sites also calls Plaintiff such names as “Dipshitidiot,” “butt-fugly,” “Mary Scummins,” “Mary Dummins...” besides talking about Plaintiff’s “breasts” and “ass.” (Exhibit 6). These discovery abuses annoy, harass, embarrass, and oppress Plaintiff.

II. Standard of Discovery

A. FRCP Rule 26 (b)(1) “Parties may obtain discovery regarding any matter, not privileged, that is relevant to the claim or defense of any party.”

Plaintiff’s gynecological and financial records are not relevant to the back injury claim. Therefore they should be denied. Plaintiff will produce all records related to the back injury.

B. FRCP Rule 26 (c) “Upon motion by a party” “accompanied by a certification that the movant has in good faith conferred” “the court may make any order which justice requires to protect a party or person from annoyance, embarrassment, oppression.”

Defendants have a very long history of abusing discovery items, interrogatories and the discovery process itself. For this reason Plaintiff requests a protective order on discovery items, interrogatories and the discovery process in this case.

III. Conclusion

Plaintiff is willing to reply to proper, relevant interrogatories and discovery requests if they are under a protective order with an enforcement clause. Plaintiff communicated this to Defendants’ attorneys who would not agree to a protective order. Plaintiff is willing to state that Plaintiff is not seeking “lost wages.” Plaintiff seeks a protective order on discovery.

WHEREFORE, Plaintiff respectfully requests that the Court grant a protective order over discovery items. Plaintiff requests that no discovery items may be posted on the Internet or shared with anyone other than attorneys, expert witnesses or litigating parties only. A proposed order is attached.

DATED: May 31, 2014

Respectfully submitted,



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CERTIFICATE OF CONFERENCE

I, Mary Cummins, hereby certify that I conferred with Defendants' attorneys on these matters April 28, 2014 and we could not come to an agreement.

CERTIFICATE OF SERVICE

I, Mary Cummins, hereby certify that a copy of **PLAINTIFF'S REPLY TO DEFENDANTS AMANDA LOLLAR, BAT WORLD SANCTUARY AMENDED MOTION TO COMPEL TO RESPOND TO INTERROGATORIES AND PRODUCE DOCUMENTS, REQUEST PROTECTIVE ORDER, BRIEF IN SUPPORT** were served on the Defendants' Attorneys of record by CM/ECF, FAX and EMAIL at,

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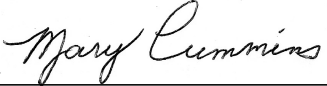
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By: 
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May 31, 2014

PLAINTIFF'S REPLY TO DEFENDANTS AMANDA LOLLAR, BAT WORLD SANCTUARY AMENDED MOTION TO COMPEL TO RESPOND TO INTERROGATORIES AND PRODUCE DOCUMENTS, REQUEST FOR PROTECTIVE ORDER, BRIEF IN SUPPORT