

BAT WORLD SANCTUARY and  
AMANDA LOLLAR,  
*Plaintiffs*

v.

MARY CUMMINS,  
*Defendant*

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IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

352nd JUDICIAL DISTRICT

**MOTION FOR CONTEMPT**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**NOW COME** Plaintiffs, Bat World Sanctuary and Amanda Lollar, Movants herein, and request that Mary Cummins be found and held in contempt of court. In support of this motion, Movants will show the Court the following:

I.

On May 4, 2011 this Court signed an order for a temporary injunction ordering Mary Cummins to immediately remove from the internet all of the materials concerning Bat World Sanctuary and Amanda Lollar which have been posted or placed on the internet at the URL's and locations listed in Exhibit A attached hereto. Mary Cummins has failed and refused to remove those materials from the internet in violation of this court's order. Mary Cummins should be held in contempt of court for her refusal to comply with the Court's order.

II.

In the temporary injunction order referred to above this Court further ordered that Mary Cummins is prohibited from posting anywhere on the internet or publishing in any way any of the statements and photographs concerning Bat World Sanctuary or Amanda Lollar that appear at the URL's and locations listed in Exhibit A. Mary Cummins has deliberately violated the Court's

order by posting on the internet and publishing statements and photographs concerning Bat World Sanctuary or Amanda Lollar that appear at the URL's and locations listed in Exhibit A. Mary Cummins should be held in contempt of court for her violation of the Court's order.

### III.

In the temporary injunction referred to above this Court further ordered that Mary Cummins is prohibited from posting on the internet or publishing in any way any videos or pictures or written text describing procedures or techniques developed by Bat World Sanctuary, including holding techniques, feeding techniques, rehabilitation procedures, episiotomies and births, injection techniques, dental extractions, parasite removal, bathing, vaccinating, and treatments of injuries including wing repair and other routine procedures. Mary Cummins has deliberately violated the Court's order by posting on the internet and publishing the Bat World Sanctuary techniques for dental extractions, episiotomies and births in violation of the Court's order. Mary Cummins should be held in contempt of court for her violations of the Court's order.

### IV.

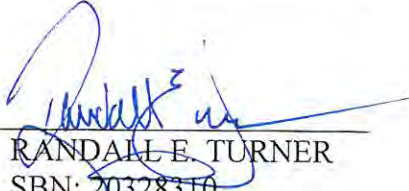
In the temporary injunction referred to above this Court further ordered that Mary Cummins is prohibited from posting on the internet or publishing in any way any videos or photographs or written text describing rehabilitation set-ups developed by Bat World Sanctuary, including medical rooms, feeding rooms, and both rehabilitation and permanent bat caging, housing and flight areas. Mary Cummins has deliberately violated the Court's order by posting on the internet and publishing videos or photographs or written text describing rehabilitation set-ups developed by Bat World Sanctuary, including medical rooms, feeding rooms, and both rehabilitation and permanent bat caging, housing and flight areas. Mary Cummins should be held in contempt of court for her violations of the Court's order.

**WHEREFORE, PREMISES CONSIDERED,** Plaintiffs request that the Court hold Mary Cummins in contempt of Court, order compliance in all respects to the Court's order, and order her

to pay attorney's fees for preparing and presenting this motion, and for such other and further relief as may be suitable in law or in equity.

Respectfully submitted,

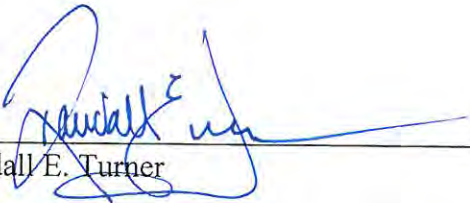
TURNER & MCKENZIE, PC  
1800 Norwood, Suite 100  
Hurst, Texas 76054  
Telephone: (817) 282-3878  
Fax: (817) 268-1563  
Email: [randy@turnermckenzie.com](mailto:randy@turnermckenzie.com)

By:   
RANDALL E. TURNER  
SBN: 20328310  
Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I certify that on this date a true and correct copy of the foregoing instrument has been hand delivered to all parties of record according to Texas Rules of Civil Procedure this 16<sup>th</sup> day of May, 2011.

Via CMRRR: 7009 2250 0003 7625 1812  
Mary Cummins  
645 W. 9<sup>th</sup> Street, #110-140  
Los Angeles CA 90015  
Defendant

  
\_\_\_\_\_  
Randall E. Turner

BAT WORLD SANCTUARY and  
AMANDA LOLLAR,  
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v.

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§ IN THE DISTRICT COURT  
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§ 352nd JUDICIAL DISTRICT

TEMPORARY INJUNCTION

On the 4<sup>th</sup> day of May, 2011 came on to be heard the application for a temporary injunction filed by the plaintiffs. The plaintiffs appeared by and through their attorney of record. The defendant, Mary Cummins, appeared in person. After hearing the evidence and considering the evidence the Court finds that the defendant has published on the internet defamatory statements and that the plaintiffs' application for a temporary injunction should be granted.

IT IS THEREFORE ORDERED that Mary Cummins immediately remove from the internet all of the materials concerning Bat World Sanctuary and Amanda Lollar which have been posted or placed on the internet at the following URL's and locations:

CARE2.COM  
<http://www.care2.com/news/member/325453706/2794699>

TRFACE.COM  
[http://trface.com/video/HZivBTq\\_6eg/bat-most-likely-with-rabies-found-in-mineral-wells-texas-at-bat-world.html](http://trface.com/video/HZivBTq_6eg/bat-most-likely-with-rabies-found-in-mineral-wells-texas-at-bat-world.html)

FRIENDFEED.COM  
<http://friendfeed.com/indybay/4c181f9f/amanda-lollar-commits-animal-cruelty-at-bat>

ANIMALSUFFERING.COM  
<http://www.animalsuffering.com/forum/viewtopic.php?t=9417>

TOPIX.COM  
<http://www.topix.com/member/profile/animalcruelty>

INDYBAY.ORG  
<http://www.indybay.org/newsitems/2011/05/01/18678593.php>

Court's Minutes *Bat World Sanctuary and Amanda Lollar vs. Mary Cummins*  
Transaction # 22 **MAILED COPY TO ALL ATTORNEYS AND PRO SE PARTIES** 5-11-11 *g*

TEMPORARY INJUNCTION

SCANNED

EXHIBIT "A"

[http://www.indybay.org/newsitems/2011/05/01/18678593.php?show\\_comments=1#18678719](http://www.indybay.org/newsitems/2011/05/01/18678593.php?show_comments=1#18678719) -

BLOGSPOT:

<http://amanda-lollar-bat-world-sanctuary-bad.blogspot.com/>

FACEBOOK:

<http://www.facebook.com/AnimalAdvocatesUSA>

<http://www.facebook.com/marycummins> -

YOUTUBE:

<http://www.youtube.com/marycummins>

[http://www.youtube.com/watch?v=HZivBTq\\_6eg](http://www.youtube.com/watch?v=HZivBTq_6eg)

<http://www.youtube.com/watch?v=ujG1sHYC1d4>

<http://www.youtube.com/watch?v=cUZepj1GvHU>

<http://www.youtube.com/watch?v=Xha2TpsW6qs>

<http://www.youtube.com/watch?v=WxN97rXZAIg>

<http://www.youtube.com/watch?v=4X1lmuQVMVI> -

<http://www.youtube.com/watch?v=kndNLXqGizM&feature=autoplay&list=PL2102200B7DD9D60F&index=70&playnext=3>

<http://www.youtube.com/watch?v=kyCp0DBmS0Y>

[http://www.youtube.com/watch?v=aBZLpk\\_m7Lo](http://www.youtube.com/watch?v=aBZLpk_m7Lo)

<http://www.youtube.com/watch?v=-uyzq4sezsM>

<http://www.youtube.com/watch?v=kndNLXqGizM>

[http://www.youtube.com/watch?v=nlKC3zwwf\\_g](http://www.youtube.com/watch?v=nlKC3zwwf_g)

<http://www.youtube.com/watch?v=aX8qBqFLDIc>

<http://www.youtube.com/watch?v=V0kah0Ej1g>

[http://www.youtube.com/watch?v=88pXZZ8\\_97g](http://www.youtube.com/watch?v=88pXZZ8_97g)

<http://www.youtube.com/watch?v=n3q5ugAJKCU>

<http://www.youtube.com/watch?v=IFqIKZLNtqw>

<http://www.youtube.com/watch?v=BtnJ6-ML26I>

FLICKR

<http://www.flickr.com/photos/62520886@N08/>

<http://www.flickr.com/photos/62357242@N04>

<http://www.flickr.com/photos/62357242@N04/sets/72157626616455966/>

[www.flickr.com/photos/marycummins/4749355505](http://www.flickr.com/photos/marycummins/4749355505)

[www.flickr.com/photos/marycummins/4749354583](http://www.flickr.com/photos/marycummins/4749354583)

[www.flickr.com/photos/marycummins/4749997958](http://www.flickr.com/photos/marycummins/4749997958)

[www.flickr.com/photos/marycummins/4749996890](http://www.flickr.com/photos/marycummins/4749996890)

[www.flickr.com/photos/marycummins/4749997152](http://www.flickr.com/photos/marycummins/4749997152)

[www.flickr.com/photos/marycummins/4749355337](http://www.flickr.com/photos/marycummins/4749355337)

[www.flickr.com/photos/marycummins/4749354735](http://www.flickr.com/photos/marycummins/4749354735)

[flickrriver.com/photos/marycummins/tags/tree](http://flickrriver.com/photos/marycummins/tags/tree)

APNI:

<http://videos.apniccommunity.com/Video,Item,1036287809.html>

<http://videos.apniccommunity.com/Video,Item,1022972594.html>

<http://videos.apniccommunity.com/Video,Item,1609073450.html>

<http://videos.apniccommunity.com/Video,Item,1783861057.html>



[http://videos.apnicommunity.com/Video\\_Search,+Channel,YouTube.html](http://videos.apnicommunity.com/Video_Search,+Channel,YouTube.html)  
<http://videos.apnicommunity.com/Video,Item,1201602253.html>  
<http://videos.apnicommunity.com/Video,Item,72057661061818466.html>  
<http://videos.apnicommunity.com/Video,Item,72057660295290434.html>  
<http://videos.apnicommunity.com/Video,Item,12568395.html>

WITTY SPARKS

[videos.wittysparks.com/id/192472557](http://videos.wittysparks.com/id/192472557)  
<http://videos.wittysparks.com/id/1201602253>

MUFT.TV

[www.muft.tv/watch/Video,Item,192472557.html](http://www.muft.tv/watch/Video,Item,192472557.html)

WN.COM

[http://wn.com/Baby\\_brown\\_Mexican\\_free\\_tail\\_bat\\_pups\\_after\\_being\\_fed,\\_Mary\\_Cummins,\\_Animal\\_Advocates](http://wn.com/Baby_brown_Mexican_free_tail_bat_pups_after_being_fed,_Mary_Cummins,_Animal_Advocates)  
[http://wn.com/Feeding\\_a\\_pregnant\\_brown\\_bat\\_meal\\_worms,\\_Mary\\_Cummins,\\_Animal\\_Advocates](http://wn.com/Feeding_a_pregnant_brown_bat_meal_worms,_Mary_Cummins,_Animal_Advocates)

NATURE TALK

<http://nature-talk.com/video/wildlife/bats/feeding-a-baby-bat-9.cqi>

VIDEOWIRED:

<http://www.videowired.com/video/12568395/>

MY ANIMAL CLIPS

<http://myanimalclips.com/video/4607>

YIDIO

<http://www.yidio.com/baby-bat-pup-nursing--bat-world-mary-cummins-animal-advocates/id/36028846047465281>

<http://www2.yidio.com/batbatmary-cummins/72057641295136587>

HIVEMIND:

[fiveprime.org/hivemind/Tags/pups,wildlife](http://fiveprime.org/hivemind/Tags/pups,wildlife)

MEFREEDIA:

<http://www.mefreedia.com/watch/31686664>

FUNNY ANIMAL VIDEOS

<http://www.funny-animal-videos.funny-pictures-jokes.com/index.php?page=watch&youtube-video=n3g5ugAJKCU&player&id=111&animal=bat&video=Wild%20bats,%20Mary%20Cummins,%20Animal%20Advocates>

MYVIDEO1

[http://www.myvideo1.com/AZzYEMUtGehNFMshnUrtWP\\_baby-brown-mexican-free-tail-bat-pups-af](http://www.myvideo1.com/AZzYEMUtGehNFMshnUrtWP_baby-brown-mexican-free-tail-bat-pups-af)

VIDEOMUSICPOPULAR.COM:

<http://www.videomusicpopular.com/tag/mary+cummins/10>  
<http://www.videomusicpopular.com/tag/mary+cummins/11>





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[http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437221966211#!/photo.php?pid=6334358&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=436439851211](http://www.facebook.com/photo.php?pid=6356316&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437221966211#!/photo.php?pid=6334358&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=436439851211)

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[http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437805611211#!/photo.php?pid=6375924&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437794391211](http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437805611211#!/photo.php?pid=6375924&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437794391211)

[http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437805611211#!/photo.php?pid=6375925&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437794396211](http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437805611211#!/photo.php?pid=6375925&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437794396211)

[http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437805611211#!/photo.php?pid=6376165&id=733516211&l=ba01fd5a9b&ref=fbx\\_album&fbid=437807826211](http://www.facebook.com/photo.php?pid=6376092&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437805611211#!/photo.php?pid=6376165&id=733516211&l=ba01fd5a9b&ref=fbx_album&fbid=437807826211)

IT IS FURTHER ORDERED that Mary Cummins is prohibited from posting anywhere on the internet or publishing in any way any of the statements and photographs concerning Bat World Sanctuary or Amanda Lollar that appear at the URL's and locations listed above.

IT IS FURTHER ORDERED that Mary Cummins is prohibited from posting on the internet or publishing in any way any videos or pictures or written text describing procedures or techniques developed by Bat World Sanctuary, including holding techniques, feeding techniques, rehabilitation procedures, episiotomies and births, injection techniques, dental extractions, parasite removal, bathing, vaccinating, and treatments of injuries including wing repair and other routine procedures.

IT IS FURTHER ORDERED that Mary Cummins is prohibited from posting on the internet or publishing in any way any videos or photographs or written text describing rehabilitation set-ups developed by Bat World Sanctuary, including medical rooms, feeding rooms, and both rehabilitation and permanent bat caging, housing and flight areas.

This case is set for trial ~~on~~ *for the week of January 9, 2012*

SIGNED this *4* day of *May*, 2011.

*William Burgham*  
JUDGE PRESIDING