

Mary Cummins
645 W 9th St #110-140
Los Angeles, CA 90015
Direct: (310) 877-4770
Fax: (310) 494-9395
mmmaryinla@aol.com
www.MaryCummins.com

June 1, 2016

County Court 3
Judge Mike Hrabal
100 E. Weatherford St, Room 290A
Fort Worth, TX, 76196-0240

RE: Amanda Lollar vs Mary Cummins, 2015-002259-3
Motion/hearing temporary injunction June 14, 2016 1:15 p.m.

Will I be allowed to appear by phone for the June 14, 2016 1:15 p.m. hearing on the temporary injunction? Has the Judge ruled on my motion for telephonic appearance? I requested that it be set for hearing before the hearing for injunction. I will again request that it be set for hearing on June 14, 2016 at 1:15 pm. It must be heard before the injunction motion if I am to have a fair trial. I am also requesting a continuance of the June 14, 2016 hearing. I must see the motion and exhibits before it can be heard.

Has the Plaintiff filed the motion for temporary injunction with exhibits? I have not received anything. I've not been noticed. There is no way I can reply and defend myself without being able to see the motion and exhibits. This is an Internet defamation lawsuit. I must view the exhibits online to see if they are real or not, research who owns/controls the website, who is the post author, if they are false or not... This is beyond unjust. It's unconstitutional to deprive me of a fair hearing.

May 4, 2011 Plaintiff's attorney Randy Turner did this same unjust thing with that motion for temporary injunction. Nothing which he demanded to be removed was defamatory. It included photos and videos which Lollar stated on the record were not defamatory. It also included prior restraint as it stated I could never post the items again in the future.

Randy Turner and his client Amanda Lollar merely wanted items written about Lollar by other people removed. I doubt any of the items are defamatory. Randy Turner just found it easier to sue me for things others had written instead of finding and suing the actual authors. I'd not seen most of the items before that hearing. I was not allowed to see any of the items until I was on the witness stand. There was no way I could show proof that they were not my websites or posts. I need to research the website owners. Randy Turner and his client will do the same unjust thing in the June 14, 2016 hearing.

In the identical 352-248169-10 lawsuit I filed motion to void the temporary injunction. Judge Bonnie Sudderth stated on the record that she would have never forced me to remove items I did not write on websites I'd never seen and didn't control. She also said she would have never included prior restraint.

The Second Court of Appeals already ruled that prior restraint is unconstitutional. They reversed that order. The court cannot write an order with prior restraint.

I'm sure Randy Turner will include websites, blogs that I don't own or control. If my name is not in the who.is directory as the owner, it's not my site. I'm sure he will also try to remove my business and an unrelated non-profit's website for the sole reason to cause harm. None of my blogs contain the name of "Amanda Lollar" except a recent one which is merely court documents in this lawsuit. Again I've never defamed Amanda Lollar or Bat World Sanctuary. Bat World Sanctuary is not a party to this lawsuit. Nothing relative to Bat World Sanctuary can be included in any injunction for this reason.

I am legally permanently physically disabled due to a back injury. The Tarrant County Courthouse ADA Dept stated this in email filed in this case. I'm also legally indigent as I receive state aid in the form of Medi-Cal. I cannot and will not appear in the court room for the June 14, 2016 hearing as I am in Los Angeles, California. I will call the court five minutes before the hearing expecting to appear by phone. If I am not allowed to appear by phone, I will be deprived of a fair hearing. I will appeal any order on the injunction. I object to the Judge signing any order on the injunction. I will be filing an amended reply to the never written, never filed motion for temporary injunction. I hereby request a court reporter for any hearing. I am requesting the transcript of any hearing. I also request that the court reporter save the audio file.

Sincerely,

A handwritten signature in cursive script that reads "Mary Cummins". The signature is written in black ink and is positioned below the word "Sincerely,".

Mary Cummins

Cc: Second Court of Appeals 02-16-00165-CV