



1 of law on expiration of that period.” September 4, 2013 Plaintiffs sent a letter to the  
2 court asking them to set the matter for hearing. The Court did not reply.

3 Also attached as Exhibit 2 is absolute proof that Plaintiffs posted Defendant’s ex-  
4 attorney’s financial records on the Internet and they are still there to this very day<sup>1</sup>. The  
5 URL is now included in the printout of the check. The order as it stands would release  
6 private confidential financial records of others. Plaintiffs is positive that Plaintiffs will  
7 post these confidential records on the Internet just as Plaintiffs previously did which  
8 would open up third parties to theft. Defendant believes this subpoena would be used  
9 for ulterior motives such as harassment of Defendant, Defendant’s family, friends and  
10 clients. This subpoena is unreasonable and oppressive, including unreasonable  
11 violations of the right of privacy of Defendant, her family, friends and unrelated third  
12 parties.

13 The order as written is overly broad in that there is no date range for the records.  
14 This could be 20 years of bank statements which would not lead to anything  
15 discoverable as it would be irrelevant based on time.

16 Plaintiffs stated they were only interested in money going in to the account.  
17 Therefore they should only receive the records for deposits and not expenditures. If  
18 Plaintiffs receive the statements in the order as it is currently written irreparable harm  
19 will come to Defendant and unrelated third parties.

### 20 **PRAYER**

21 Defendant respectfully requests that this Court deny Plaintiffs’ court order as  
22 these records were previously requested and denied. In the alternative Defendant  
23 requests that the order be modified to not include records of people, entities other than  
24 Defendant, the date range of records be limited to the past 12 months, the records only  
25 include money deposited into the account and not expenditures and the records,  
26 contents thereof may not be shared publicly or posted on the Internet.

27  
28 

---

<sup>1</sup> <http://www.batworld.org/wp-content/uploads/2011/09/Bat-World-chk-2625-09-09-11.pdf>

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

2 Respectfully submitted,

3 *Mary Cummins*

4 Mary Cummins, Defendant

5 Dated: June 2, 2014

6 645 W. 9th St. #110-140

7 Los Angeles, CA 90015

8 In Pro Per

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Filemark	Description	Fee Total
Cause Number: 352-248169-10 Date Filed: 09/15/2010		
BAT WORLD SANCTUARY, ET AL   v   MARY CUMMINS		
APPEALED Cause of Action: CONTRACT, OTHER CONTRACT		
Case Status: FINAL JUDGMENT AFTER NON-JURY TRIAL		
10/26/2012	LETTER FROM THE CT RE:RECUSAL MOTION	I 0.00
10/26/2012	*COPY OF LETTER W/PLEADINGS FILED IN COA	I 0.00
10/26/2012	FIAT NOT/HRG 10/31 1:30PM CONTESTS AFFDIT INABILITY	I 0.00
10/26/2012	LTR/CUMMINS RE:PAYMENT	I 0.00
10/29/2012	MOTION FOR NEW TRIAL	N 40.00
10/29/2012	COURT COST (PAID) trans #259	YI 40.00
10/29/2012	OVERPAYMENT-MONEY ORDER #19419892920 (MARY CUMMINS	Y 40.00
10/29/2012	Overpayment Disbursement Request Granted on 10/29/	Y 0.00
10/29/2012	FIAT NOT/HRG 11/2 11:30AM APPELLANT'S MOT/RECUSE,	I 0.00
10/31/2012	***ORD/CONTESTS TO AFFDIT INABILITY TO PAY COSTS***	IM 0.00
11/01/2012	APPELLANT'S BANK STATEMENT FOR MARY CUMMINS	I 0.00
11/01/2012	APPLICANT'S RESP/APPELLEES' MOT/RECONSIDERATION &	I 0.00
11/06/2012	***ORD/DENY MOT/RECUSE***	IM 0.00
11/07/2012	*1ST SUPP CLERKS REC(CONTEST HRG) (\$14.00 NOT PD	I 0.00
11/12/2012	*LETTER FROM COA (REC DUE 12/12/12)	I 0.00
11/15/2012	DEFNS AMD MOT/NEW TRIAL & VACATE JUDGMENT W/FIAT	I 0.00
11/15/2012	DEFNS MOTION FOR TELEPHONIC HRG	I 0.00
11/20/2012	REFUND OVERPAYMENT Check # 41687	Y -40.00
12/06/2012	*CLERKS RECORD E-FILED (\$221.00)	I 0.00
X 01/02/2013	PLTFS' MOT/COMPEL POST JDG DISC RESP W/FIAT	I 0.00
01/07/2013	DEFNS RESP TO PLTFS MOT/COMPEL POST TRIAL DISC	I 0.00
01/07/2013	DEFNS MOT/TELEPHONIC HRG RE:DEFNS RESP TO PLTFS	I 0.00
01/18/2013	PLTFS MOT/TRANSFER ORIG EXHIBITS TO 2ND COURT OF	I 0.00
01/29/2013	LETTER-VACATION RANDALL TURNER	I 0.00
02/11/2013	***ORD/GRANT MOT/TRANSFER ORIG EXHIBITS TO 2ND	IM 0.00
04/09/2013	***ORD RETURNING BOND MONEY HELD TRO TO PLTFS***	IM 0.00
04/10/2013	Trust notification from #285	0.00
05/09/2013	Redeposit Trust Investment	Y 510.52
05/10/2013	Trust Withdrawal	Y -509.47
05/10/2013	Trust Withdrawal	Y -1.05
09/04/2013	POST-JDG MOT/CONTEMPT	NI 40.00
09/04/2013	COURT COST (PAID) trans #290	Y 40.00
X 09/04/2013	LTR/TURNER SET HRG PLTFS' MOT/COMPEL	I 0.00
09/19/2013	DEFN'S RESP TO PLTF'S MOT/COMPEL POST TRIAL DISC	I 0.00
09/19/2013	DEFN'S OBJ TO PLTFS' POST JDG MOT/CONTEMPT W/FIAT	I 0.00
09/19/2013	DEFN'S MOT/TELEPHONIC HRG W/FIAT	I 0.00
12/16/2013	DEFNS MOT/STAY FINAL JUDG PENDING APPEAL W/FIAT	I 0.00
12/16/2013	DEFNS MOT/TELEPHONIC HRG RE:MOT/STAY W/FIAT	I 0.00

Total Number Of Records Printed: 296

**NEAL S. CALLAWAY**  
ATTORNEY AT LAW

Being advised:  
P.O. BOX 17128  
PORT WORTH TX 76162-0128

Telephone 817-333-2076  
Facsimile 817-377-5661  
e-mail neal@nealcallaway.com

September 8, 2011

Randall E. Turner  
LAW OFFICE OF TURNER & MCKENZIE  
1800 N. Harwood Drive, Suite 300  
Halt, Texas 76114

RE: *Bat World Secretary and Amanda Lollar v. Mary Gonzalez*, Cause No. 2011-248569-10 in the 352<sup>nd</sup> Judicial District Court, Tarrant County, Texas.

Dear Mr. Turner:

Enclosed please find my check in the sum of \$500.00 from my client payable to your firm for the court ordered attorney's fees.

Sincerely,

