

1 MARY CUMMINS
2 Plaintiff
3 645 W. 9th St. #110-140
4 Los Angeles, CA 90015
5 In Pro Per
6 Telephone: (310) 877-4770
7 Email: mmmaryinla@aol.com

8 SUPERIOR COURT OF CALIFORNIA
9
10 COUNTY OF LOS ANGELES

11 MARY CUMMINS) Case No. BS143169
12)
13 *Petitioner*)
14) PETITIONER'S RESPONSE TO
15) RESPONDENT'S RESPONSE TO
16) REQUEST FOR CIVIL
17) RESTRAINING ORDER
18)
19) Date: July 1, 2013
20) Time: 8:30 a.m.
21) Dept: 75
22) Room: 736
23)
24)
25)
26)
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I. INTRODUCTION

Respondent Amanda Lollar ("Lollar") was served May 28, 2013 (Exhibit 1 Proofs of Service, Petitioner's Declaration). Petitioner Mary Cummins ("Cummins") emailed Lollar's California attorney Dean Rocco May 28, 2013 and asked if he would be Lollar's attorney for this case. Rocco did not reply until immediately before the hearing June 12, 2013. Respondent replied to the restraining and appeared through her attorney. Where a party appears voluntarily in an action, service of process is generally no longer required.

Cummins has offered real evidence of a credible threat of violence against her and a willful course of conduct directed at her which seriously harassed her and served no legitimate purposed. Cummins will offer more evidence at the July 1, 2013 hearing of

1 a credible threat of violence and harassment. Cummins will also show physical
2 evidence that Lollar violated the temporary restraining order over 150 times in the past
3 month by contacting Cummins directly and continuing to harass Cummins.

4 Cummins does not have a history of filing frivolous litigation and applications for
5 restraining orders. Lollar cites a restraining order application against Jason Simas
6 which Cummins was awarded. Cummins was not denied as Lollar states. Respondent's
7 Exhibit "C" clearly shows that an order was made April 10, 2002. Cummins received a
8 restraining order against Simas. Cummins did sue Lollar in District Court for
9 defamation. The case is ongoing.

10 Cummins has not subjected Lollar to harassment. Cummins reported Lollar for
11 animal cruelty, neglect, violations of the USDA Animal Welfare Act, Texas Parks &
12 Wildlife Department and Texas Veterinary Board. Lollar was investigated and
13 violations were found. In fact a USDA veterinarian stated that Lollar "violated the
14 Animal Welfare Act" and caused bats "pain, suffering," and "death" (Exhibit 2). Lollar
15 was also reprimanded by Texas Parks & Wildlife Department for numerous regulation
16 violations (Exhibit 3). The Texas Health Department also gave Lollar a list of orders
17 that she must file.

18 Lollar sued Cummins in 2010 for defamation and breach of contract. Lollar did not
19 sue for "harassment." That case is currently in appeal. Lollar in her appeal reply brief
20 admitted that Cummins made fair and privileged reports against her for animal cruelty,
21 neglect and other violations. Lollar admitted those were not defamation but fair and
22 privileged reports to authorities. Lollar then stated that the comments Cummins made
23 online came directly from those same reports. Therefore nothing Cummins stated was
24 defamation. Cummins should win the appeal.

25 **II. SUMMARY OF RELEVANT FACTS**

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1 **A. CUMMINS REPORTED AMANDA LOLLAR TO AUTHORITIES FOR**
2 **ANIMAL CRUELTY, NEGLECT, VIOLATIONS OF ANIMAL WELFARE**
3 **ACT, VIOLATIONS OF TEXAS PARKS & WILDLIFE DEPARTMENT**

4 Cummins was invited to intern with Amanda Lollar at Bat World Sanctuary in
5 2010. Cummins expected to learn advanced bat care. Instead she witnessed animal
6 cruelty, animal neglect, violations of the Animal Welfare Act and violations of the
7 Texas Parks & Wildlife Department regulations. Cummins left early and reported
8 Lollar to authorities. Lollar was investigated. Violations were found. Cummins never
9 stated "Bat World had been shut down by the health Department." Lollar shows no
10 evidence of this.

11 Lollar sued Cummins for defamation and breach of contract in retaliation for
12 reporting Lollar to authorities. Lollar prevailed in that case. Cummins filed a motion
13 for new trial and objections to court order. That case is in appeal in the Second Court
14 of Appeals in Texas.

15 **B. CUMMINS DOES NOT HAVE A HISTORY OF INSTITUTING FRIVOLOUS**
16 **LITIGATION OR MAKING UNFOUNDED ACCUSATIONS AGAINST**
17 **INDIVIDUALS**

18 **1. Previous applications for restraining orders**

19 October 2001 Cummins filed a request for civil restraining order against her
20 neighbor Jason Simas. It was not September 2010 as Respondents state. The request
21 was not dismissed. Cummins received a court order against Simas April 10, 2002 as
22 per their own exhibit "C". Again, Respondents misquote the legal record. Cummins did
23 accuse her neighbor of taking a sledge hammer to her house which he did. Cummins
24 showed video of her neighbor using a sledgehammer against her house to the court.
25 Simas was forced to pay for the damage. Cummins' husband also testified to this effect
26 in trial.
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1 December 2010 Cummins filed an application for restraining order on Google
2 because Google was hosting blogs which were defamation per se. The court stated
3 Petitioner must name an individual and told Cummins to name the CEO of the
4 company. Petitioner named Eric Schmidt then CEO of Google telling the court that she
5 wanted the injunction against Google for not enforcing their terms of service. She did
6 not want an injunction against Schmidt. Petition was denied. Cummins then sued the
7 individual bloggers for defamation.

8 **2. Lawsuits Filed by Cummins**

9 Respondent's attorneys did a name search for lawsuits in the name of "Cummins"
10 in Los Angeles County. There are many, many, many people named "Cummins" in Los
11 Angeles County including Cummins' grandmother "Mary Cummins," Cummins'
12 mother "Marie Cummins," Cummins' sister, "Marie Cummins" and many other
13 unrelated individuals with the same name. There are in fact currently five people
14 named "Mary Cummins" who are also in real estate like Petitioner in the City of Los
15 Angeles alone. Petitioner is not all the "Cummins" or "Mary Cummins" in the search
16 results. Respondents are intentionally mischaracterizing Petitioner.

17 Cummins has filed some small claims lawsuits in Los Angeles. Cummins has won
18 all of those cases except a couple. Cummins only sues people when she has good legal
19 reason.

20 Cummins did file a case against the City of Los Angeles for unlawful termination.
21 The case was settled for \$140,000 in favor of Petitioner. There is no gag order. City
22 employee Ed Boks sexually harassed Petitioner and she was unlawfully terminated. As
23 soon as the City saw all of Petitioner's evidence they immediately settled the case and
24 Boks was then fired under the pretense that his employment had "concluded."

25 **3. Cummins has no history of unfounded stalking and harassment accusations**

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1 Cummins has stated that Tiffany Krog and Annette Stark had harassed and stalked
2 her which they did. Tiffany Krog has removed her harassing blog. Annette Stark is
3 dead. Cummins did not file for a restraining order against Krog or Stark.

4 Cummins stated that the attorney representing Lollar in Texas acted inappropriately
5 which he did. Video evidence from the deposition clearly shows attorney Randy Turner
6 staring inappropriately at Petitioner, falling asleep, refusing to look at exhibits and
7 texting during his client's deposition.

8 Cummins also stated that he touched her hand in her deposition. Cummins was
9 supposed to receive a copy of those deposition videos. Lollar refused to give Cummins
10 a copy of all of the deposition videos so she could prove what happened. Cummins
11 was forced to file a motion to compel which she won. Lollar then filed a protection
12 order which she lost. The Judge ordered Lollar to give Cummins all of the videos.
13 Lollar then stated the video was lost, destroyed, corrupted. If the video was indeed lost,
14 destroyed, corrupted, there would have been no need to waste four months filing
15 motions to compel and protect. Lollar destroyed evidence so that there would be no
16 way for Cummins to prove what happened.

17 Cummins' had an attorney named Neal Callaway in Texas. Cummins did not realize
18 that Callaway had a medical condition until she met him in person in Texas. He could
19 barely speak, stuttered and had major full body tics for the first half an hour when they
20 met. Callaway then made mistakes in her case by forgetting to file exhibits, never
21 giving her a copy of filings and not fulfilling his promise to get the case dismissed
22 within two weeks with refund of most of Cummins' retainer.

23 Cummins contacted the bar association which referred Callaway to her and asked
24 how they vetted their attorneys. She expressed her concern about his medical condition
25 and mistakes to the bar association stating she was not making a complaint and not to
26 share this information with Callaway. Cummins also told the bar association that she
27 was going to let him go after the next hearing. The bar association relayed the
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1 information to Callaway without permission. Callaway admitted he received the email,
2 was deeply offended and filed the motion to withdraw. Cummins NEVER made a
3 report to the bar association about Callaway. After this incident Callaway retired from
4 law.

5 **3. Cummins' complaints against Lollar and Bat World**

6 Cummins first reported Lollar to authorities July 2, 2010 immediately upon
7 returning from Texas. It was not April 2011. They were investigated by USDA and
8 TPWD. Violations were found. Respondents are not being truthful.

9 **4. Law and Motion Matters**

10 Cummins was not sanctioned by a Texas court for filing a motion to recuse a judge
11 that was groundless and filed in bad faith. Judge Walker stated in a previous hearing
12 "The signatures of attorneys or parties constitute a certificate by them that they have
13 read the pleadings, motion or other paper that to the best of their knowledge,
14 information and belief formed, after reasonable inquiry, the instrument is not
15 groundless and brought in bad faith or groundless and brought for purposes of
16 harassment. It's that word 'belief' that is, I think, the problem that you have. From
17 what I've heard from Ms. Cummins, she stated it was her belief and she stated the basis
18 for her belief. Your motion for Rule 13 sanctions is denied." Cummins was sanctioned
19 \$500 for Rule 18(a). In fact the Appeals court has already overturned the last order by
20 the Judge Cummins requested to be recused stating it was not just.

21 **C. CUMMINS FILED A DEFAMATION SUIT AGAINST LOLLAR FOR** 22 **DEFAMATION. THE CASE IS ONGOING.**

23 Lollar sued Cummins for defamation September 2010 in retaliation for Cummins
24 reporting her to authorities. Lollar also started defaming Cummins on the Internet
25 stating she's a "convicted criminal" "found guilty of credit card, forgery, fraud and
26 theft." Lollar posted a fake criminal rap sheet knowing that it was not true. Cummins
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1 sent a cease and desist to Lollar who refused to remove it. Lollar admitted in sworn
2 deposition that she posted that and knew it was not true.

3 Cummins sued Lollar for defamation September 2011. Again, Respondents
4 misquote the legal record. Cummins does not believe Judge Dolly Gee ruled according
5 to the evidence or law. Judge Gee did not even have legal jurisdiction in Federal court
6 when she made her ruling November 2012 because diversity of citizens was lost
7 months earlier. Cummins filed an appeal but it was rejected because the case has not
8 yet concluded. When the case concludes with the other Defendants, Cummins will
9 appeal the ruling.

10 **D. CUMMINS FILED THE RESTRAINING ORDER MAY 24, 2013**

11 The motion for summary judgment ruling was November 2012. Cummins filed her
12 restraining order May 24, 2013 six months later, not instantly. Again, Lollar misquotes
13 the legal record.

14 May 21, 2013 Cummins received a copy of an email Lollar sent to her webhost
15 demanding that they remove her domains, blogs and websites. The host forwarded the
16 letter to Cummins. Cummins replied to the webhost cc'd to Lollar's Texas attorney and
17 Lollar. Cummins cc'd Lollar so the webhost would see that she received a copy of the
18 email. The email is to the webhost, not Lollar. In the email Cummins states that Lollar
19 is defaming and harassing her. Cummins stated that the USDA vet stated that Lollar
20 caused bats "pain, suffering" and "death" which is the truth.

21 **E. CUMMINS SERVED THE TRO ON LOLLAR, HER ATTORNEY AND** 22 **NOTIFIED ALL HER TEXAS AND CALIFORNIA LAWYERS**

23 Cummins stated in a hearing before Judge Margaret Nagle in California May 14,
24 2013 that she would be getting a restraining order on Lollar because Lollar used her
25 social security number to try to access Cummins' bank accounts (Exhibit 4). Cummins
26 has sent numerous cease and desist emails to Lollar's attorneys since May 2011 asking
27 Lollar to cease defaming and harassing her yet Lollar continues.
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1 Lollar was served at her residence, work address which is 217 N. Oak. Lollar
2 instantly posted online that she received the restraining order. Lollar was also served
3 through her Texas attorney May 29, 2013 at his office. Cummins instantly emailed all
4 of her lawyers the restraining order. Cummins has also emailed them when Lollar has
5 violated the restraining order which so far is over 150 times.

6 **IV. LEGAL ARGUMENT**

7 **A. THIS COURT HAS PERSONAL JURISDICTION OVER LOLLAR**

8 Lollar was served and appeared through her attorney.

9 **B. CUMMINS HAS MET THE BURDEN FOR A RESTRAINING ORDER**

10 Cal. Code of Civ. Proc. S 527.6(b) sets forth the criteria for a Civil Harassment
11 Restraining Order. Cummins has met the burden of proof and will show more proof at
12 trial.

13 Lollar's has harassed and made credible threats of violence over a course of conduct
14 over three years. Lollar began harassing, stalking Cummins immediately after she
15 reported Lollar July 2010 and continues to this day. Cummins reiterates her statement
16 in form MC-025 attachment 7a(3, 4, 5).

17 **1. Lollar defamed Cummins in retaliation for reporting her to authorities**

18 Again Respondent does not tell the truth in their reply. Cummins reported Lollar to
19 authorities. They were investigated. Violations were found. The USDA veterinarian
20 stated in writing that Lollar caused bats "pain, suffering" and "death." Lollar was
21 reprimanded by Texas Parks & Wildlife for violating regulations. The Texas Health
22 Department gave her a list of orders to follow.

23 **2. Cummins has proof, has shown proof and will show more proof that Lollar 24 posted the defamatory material**

25 Again Respondents misquote the legal record! Lollar stated online that Cummins
26 "has a criminal record," "committed theft, forgery, credit card fraud." Proof was
27 provided in the California case. Lollar in sworn deposition admitted that she posted
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1 those items (Exhibit 5). Judge Gee never stated that Lollar did not make all of those
2 statements.

3 Cummins stated that Lollar posted a death threat online. Lollar controls the group
4 where the post was made. Lollar approves posts and approved that post which was a
5 death threat against Cummins made by another user.

6 Cummins sent a subpoena to Google to get the identities of John Does who
7 defamed her on Google, Blogger and YouTube. Lollar filed a motion to quash
8 subpoena. Cummins filed a motion to compel and won that motion. Google gave the
9 identities of the John Does to Cummins. Lollar was one of the John Does who made
10 the defamatory statements. Lollar was identified through her email and Internet
11 Service Provider and Internet Protocol number.

12 Since then Lollar got a new email and a new Internet Service Provider thinking that
13 she would be anonymous. She is not anonymous. Lollar has been identified as Google
14 user Rachel Thompson and a few others. Cummins will show proof at the hearing that
15 Lollar made these posts as user Rachel Thompson and others.

16 **3. Cummins never attributed certain conduct to persons other than Lollar**

17 Again Respondents misquote the record which they attached as an exhibit "L."
18 Cummins never accused Lollar's attorney of putting the M-80 or molotov cocktail
19 under Cummins' car. Cummins merely stated "I believe he already has the address."

20 **4. The incident involving an alleged service of process was not a service of process**

21 Cummins filed a police report when Robert Young trespassed into a private banquet
22 room and pretended to have papers to serve on Cummins. Cummins thought she was
23 being served with a new lawsuit. Young and his colleague both were videotaping
24 Cummins against her wishes and she told them she does not allow videotape. Then
25 Young hit her with the papers (Exhibit 7, to be presented at trial).

26 There were no legal documents that needed to be served upon Cummins. Lollar had
27 filed an inability to serve Cummins. Cummins emailed Lollar's attorney who stated he
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1 did not send that process server and was finished with the case (Exhibit 8). The
2 documents that hit Cummins were filed November 3, 2012 and she was hit with them
3 February 27, 2013 while she was preparing for the Mayoral Convention for the League
4 of Humane Voters. Lollar would have needed to refile to reserve Cummins at the
5 proper address.

6 The video posted online is extremely edited. Young does not place the documents at
7 her feet. You see the documents bouncing off Cummins and then ending on the floor.
8 Cummins reported the video to YouTube and they removed it as harassment. Lollar
9 then reposted it in another account and they again removed it as harassment.

10 **5. Cummins has proof that Lollar attempted to access her bank accounts**

11 Cummins' banks contacted her via letter and email when someone tried to access
12 her bank accounts using her personal information including her social security number
13 (Exhibit 9). Cummins' chiropractor accidentally left her social security number and
14 bank account numbers in medical records given to Lollar's attorney under protective
15 order. Cummins told Lollar's attorneys this and told them to make sure Lollar does not
16 get ahold of it.

17 After Cummins' banks contacted her they instructed her to go to the bank in person.
18 At the bank the bank manager and teller told her that a woman with a Texas accent
19 tried to access her accounts. (Lollar is from Texas and has a Texas accent when
20 speaking normally. Lollar confided to Cummins that she tries to hide her accent with
21 non-Texas.) The banks played the audio recordings of the phone calls for Cummins.
22 Cummins identified Lollar as the voice on the audio tape and stated same to police
23 who are still investigating. Cummins sent a subpoena to the bank to get a copy of the
24 audio tapes but has not received them yet. Cummins also sent subpoenas to Facebook
25 and Google to get the records for the users in question but they have not yet replied.

26 **6. Lollar has violated the restraining order over 150 times in the last month**

1 Since Lollar was found to be some of the John Does via subpoena to Google by her
2 email address an Internet Service Provider, Lollar got a new Internet Service Provider
3 thinking she would be anonymous. She is not anonymous. Lollar is Google user
4 Rachel Thompson and others. Cummins will show the evidence at trial.

5 Lollar does not fear for her own safety. In writing Lollar stated that she can't get a
6 restraining order against Cummins because Cummins has not made a physical threat
7 (Exhibit 10).

8 Cummins has posted that she has gone through the police academy, taken the
9 weapons class, has a permitted gun and is willing to defend herself to the full extent of
10 the law. After Lollar and her independent contractor Eric Shupps started posting her
11 very private home address, Cummins did state that has a permitted gun and has taken
12 the gun class at the police academy. Cummins fears for her life. When Cummins'
13 Facebook friends asked her if she had an appropriate gun to protect herself from Lollar
14 Cummins did state that she has a gun with hollow points. The purpose of that gun is to
15 drop someone at close range. The purpose of the gun is to legally defend Cummins at
16 her home. Over the last few months a few people have come to Cummins' home and
17 tried to enter through a locked door and locked gate.

18 **6. Lollar's Declaration contains false statements**

19 Item 2 Lollar states the documents were taped to a non-functioning door at 215 N.
20 Oak. Cummins' process server took a photo. They were wedged into the handle of the
21 main door at 217 N. Oak (Exhibit 10).

22 Item 3 Lollar states that Cummins made false statements about Lollar. Cummins never
23 made false statements about Lollar.

24 Item 4 Lollar states Cummins contacted her directly. Cummins did not contact Lollar
25 directly. Cummins emailed her webhost cc'd to Lollar and her attorney to reply to an
26 email Lollar sent to her webhost which was full of falsehoods. Exhibit "C" is not a
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1 copy of an email Lollar received from Cummins. It's a copy of an email Lollar
2 received from Dottie Hyatt.

3 Item 5 Lollar states she did not post a death threat. Lollar admitted in sworn
4 deposition she controls Yahoo group "worldbatline." Lollar approves the posts. Lollar
5 approved a post which was a death threat against Cummins.

6 Item 6 Lollar states she has never posted a comment regarding Cummins' appearance.
7 Attached as Exhibit 11 is but one of hundreds of posts and comments Lollar has made
8 about Cummins' appearance.

9 Item 7 Lollar states Cummins was legally served and documents were placed at her
10 feet which is not true. Cummins was not legally served and Robert Young hit her with
11 the documents.

12 Item 8 Lollar states she has not contacted Cummins since the issuance of the TRO.
13 Lollar immediately started harassing Cummins on Facebook. Cummins reported her
14 comments as "harassment" and they were removed as "harassment." Lollar also
15 contacted Cummins directly through Google blogger as user Rachel Thompson.

16 Item 9 Lollar does not fear for her own safety and stated so online. Lollar goes out of
17 her way to harass Cummins personally.

18 Item 10 Lollar states that Cummins posted a threat against Lollar. Lollar had posted
19 Cummins' very private home address online publicly. Cummins replied that she has a
20 gun and will protect herself which is true. This prove how much Cummins fears Lollar.

21 Item 11 Lollar states that Cummins posted that she has a gun with hollow point
22 bullets. Cummins has a gun with hollow points bullets because she fears Lollar and
23 anyone that Lollar may hire to attack Cummins.

24 **7. Attorney Katherine McSweeney's Declaration contains falsehoods**

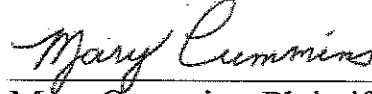
25 Item 10 states it is a copy of complaints Cummins made to government agencies about
26 Lollar and their responses. That is not true. Cummins reports were Plaintiffs' Exhibit
27 19 which was lengthy. Exhibit "J" merely contains a few emails.
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1 Item 12 Exhibit "L" is a copy of a transcript from a hearing. The transcript does NOT
2 state that Cummins accused Randy Turner of placing incendiary devices under her car!

3 **CONCLUSION**

4 For the foregoing reasons and others which will be presented at trial, the Court
5 should grant the restraining order.

6
7 Respectfully submitted,

8 

9 Mary Cummins, Plaintiff

10 Dated: June 29, 2013

11 645 W. 9th St. #110-140

12 Los Angeles, CA 90015

13 In Pro Per

14 Telephone: (310) 877-4770

1 PROOF OF SERVICE BY MAIL
2 (FRCivP 5 (b)) or
3 (CCP 1013a, 2015.5) or
4 (FRAP 25 (d))

5 I am Plaintiff in pro per whose address is 645 W. 9th St. #110-140, Los Angeles,
6 California 90015-1640. I am over the age of eighteen years.

7 I further declare that on the date hereof I served a copy of:

8 **PETITIONER'S RESPONSE TO RESPONDENT'S RESPONSE TO REQUEST**
9 **FOR CIVIL RESTRAINING ORDER**

10 by handing it to Rocco Dean in person before trial.

11 **Rocco Dean**
12 Jackson & Lewis
13 725 S. Figueroa Blvd, #2500
14 Los Angeles, CA 90017

15 I declare under penalty of perjury, under the laws of the State of California, that the
16 foregoing is true and correct.

17 Executed this day, July 1, 2013, at Los Angeles, California

18 Respectfully submitted,

19 

20 Mary Cummins, Plaintiff

21 Dated: July 1, 2013

22 645 W. 9th St. #110-140

23 Los Angeles, CA 90015

24 In Pro Per

25 Telephone: (310) 877-4770

DECLARATION OF PLAINTIFF MARY CUMMINS

I, MARY CUMMINS, declare as follows:

1. I am Mary Cummins Plaintiff in pro per. I make this declaration on my personal knowledge of the facts set forth herein.
2. Attached to PETITIONER'S RESPONSE TO RESPONDENT'S RESPONSE TO REQUEST FOR CIVIL RESTRAINING ORDER as Exhibit 1 is a true and correct copy of the proof of service of Amanda Lollar and her Texas attorney Randy Turner.
3. Attached to PETITIONER'S RESPONSE TO RESPONDENT'S RESPONSE TO REQUEST FOR CIVIL RESTRAINING ORDER as Exhibit 2 is a true and correct copy of a document I received in a FOIA request. It is an email from USDA Veterinarian Dr. Laurie J. Gage to USDA officials, copy of a letter Amanda Lollar refused from the USDA which was returned and a copy of an email Lollar's ex-USDA representative sent to USDA officials stating that Lollar knows her permit is cancelled.
4. Attached to PETITIONER'S RESPONSE TO RESPONDENT'S RESPONSE TO REQUEST FOR CIVIL RESTRAINING ORDER as Exhibit 3 is a true and correct copy of a document I received in a FOIA request. It is an email from Wendy Connally of TPWD to Amanda Lollar cc'd to Lollar's TPWD representative.
5. Attached to PETITIONER'S RESPONSE TO RESPONDENT'S RESPONSE TO REQUEST FOR CIVIL RESTRAINING ORDER as Exhibit 4 is a true and correct copy of a transcript from the May 14, 2013 hearing before Judge Margaret Nagle.
6. Attached to PETITIONER'S RESPONSE TO RESPONDENT'S RESPONSE TO REQUEST FOR CIVIL RESTRAINING ORDER as Exhibit 5 is a true and correct copy of a transcript from Lollar's November 8, 2011 deposition.

- 1 7. Attached to PETITIONER'S RESPONSE TO RESPONDENT'S RESPONSE
2 TO REQUEST FOR CIVIL RESTRAINING ORDER as Exhibit 8 is a true and
3 correct copy of an email I received from and sent to Lollar's attorney Richard
4 Evanns.
- 5 8. Attached to PETITIONER'S RESPONSE TO RESPONDENT'S RESPONSE
6 TO REQUEST FOR CIVIL RESTRAINING ORDER as Exhibit 10 is a true and
7 correct copy of a post Lollar made on Facebook as user Stand up to Cyber-
8 Stalkers" stating Lollar can't get a restraining order on me because I have not
9 threatened physical harm.
- 10 9. Attached to PETITIONER'S RESPONSE TO RESPONDENT'S RESPONSE
11 TO REQUEST FOR CIVIL RESTRAINING ORDER as Exhibit 10a is a photo
12 taken by my process server of the TRO wedged into the handle of the main door
13 at 217 N. Oak.
- 14 10. Attached to PETITIONER'S RESPONSE TO RESPONDENT'S RESPONSE
15 TO REQUEST FOR CIVIL RESTRAINING ORDER as Exhibit 11 is one of
16 hundreds of posts Lollar has made about my appearance. I downloaded it from
17 Lollar's blog marycumminss.wordpress.com.
- 18 11. I wrote the PETITIONER'S RESPONSE TO RESPONDENT'S RESPONSE
19 TO REQUEST FOR CIVIL RESTRAINING ORDER. Everything stated in that
20 document is the absolute truth

21 I, declare under penalty of perjury under the laws of the State of California that the
22 foregoing is true and correct.

23 Executed on June 29, 2013 at Los Angeles, California.

24
25 By: Mary Cummins
26 MARY CUMMINS
27
28

CH-200 Proof of Personal Service

1 Person Seeking Protection
Name: MARY CUMMINS

2 Person From Whom Protection Is Sought
Name: AMANDA LORRAINE LOLLAR

- 3 Notice to Server
The server must:
- Be 18 years of age or older.
 - Not be listed in items 1 or 3 of Form CH-100.
 - Give a copy of all documents checked in 4 to the person in 2. (You cannot send them by mail.) Then complete and sign this form and give or mail it to the person in 1.



Clerk stamps date here when form is filed.

Fill in court name and street address:
Superior Court of California, County of
Los Angeles Superior Court
111 N. Hill Street, Dept. 75
Los Angeles, CA 90012

Fill in case number:
Case Number:
BS143169

PROOF OF PERSONAL SERVICE

- 4 I gave the person in 2 a copy of the forms checked below:
- a. CH-109, Notice of Court Hearing
 - b. CH-110, Temporary Restraining Order
 - c. CH-100, Request for Civil Harassment Restraining Orders
 - d. CH-120, Response to Request for Civil Harassment Restraining Orders (blank form)
 - e. CH-120-INFO, How Can I Respond to a Request for Civil Harassment Restraining Orders?
 - f. CH-130, Civil Harassment Restraining Order After Hearing
 - g. CH-800, Proof of Firearms Turned In or Sold (blank form)
 - h. Other (specify): _____

5 I personally gave copies of the documents checked above to the person in 2: Posted to business door.
 a. On (date): 5-28-2013 b. At (time): 3:30 a.m. p.m. Posted to business door.
 c. At this address: 217 N. OAK AVENUE
 City: MINERAL WELLS State: TEXAS Zip: 76067

6 Server's Information
 Name: ZEKE JACKSON
 Address: 2306 E. Berry St.
 City: FORT WORTH State: TEXAS Zip: 76119
 Telephone: 817-535-1111

(If you are a registered process server):
 County of registration: ALL TEXAS, ALL TEXAS COUNTIES Registration number: 5CH-1842

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: May 29, 2013

Type or print server's name: ZEKE JACKSON

Server to sign here: [Signature]

CH-200 Proof of Personal Service

- ① Person Seeking Protection
Name: MARY Cummins
- ② Person From Whom Protection Is Sought
Name: AMANDA LORRAINE Lollar
- ③ Notice to Server Through her Attorney Randy Turner

- The server must:
- Be 18 years of age or older.
 - Not be listed in items ① or ③ of Form CH-100.
 - Give a copy of all documents checked in ④ to the person in ②. (You cannot send them by mail.) Then complete and sign this form and give or mail it to the person in ①.



Clerk stamps date here when form is filed.

Fill in court name and street address:
 Superior Court of California, County of
Los Angeles Superior Court
111 N. Hill Street, Dept. 75
Los Angeles, CA 90012

Fill in case number:
 Case Number: BS 143169

PROOF OF PERSONAL SERVICE

- ④ I gave the person in ② a copy of the forms checked below:
 - a. CH-109, Notice of Court Hearing
 - b. CH-110, Temporary Restraining Order
 - c. CH-100, Request for Civil Harassment Restraining Orders
 - d. CH-120, Response to Request for Civil Harassment Restraining Orders (blank form)
 - e. CH-120-INFO, How Can I Respond to a Request for Civil Harassment Restraining Orders?
 - f. CH-130, Civil Harassment Restraining Order After Hearing
 - g. CH-800, Proof of Firearms Turned In or Sold (blank form)
 - h. Other (specify): _____

- ⑤ I personally gave copies of the documents checked above to the person in ②: Through her Attorney RANDY Turner
 - a. On (date): 5-29-2013 b. At (time): 11:15 a.m. p.m.
 - c. At this address: 1901 Airport Freeway
 City: Bedford, Texas 76021 State: Texas Zip: 76021

- ⑥ Server's Information
 Name: ZEKE JACKSON
 Address: 2306 E. Berry St.
 City: Ft Worth State: TEXAS Zip: 76119
 Telephone: 817-535-1111

(If you are a registered process server):
 County of registration: ALL Texas Counties Registration number: SCH-1842

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: 5-29-2013

ZEKE JACKSON
 Type or print server's name

[Signature]
 Server to sign here

Morris, Connie R (APHIS)

From: Gage, Laurie J (APHIS)
Sent: Thursday, May 05, 2011 4:13 PM
To: Jones, Daniel R (APHIS)
Cc: Morris, Connie R (APHIS); Gibbens, Robert (APHIS)
Subject: Re: Complaint against Bat World Sanctuary, Amanda Lollar

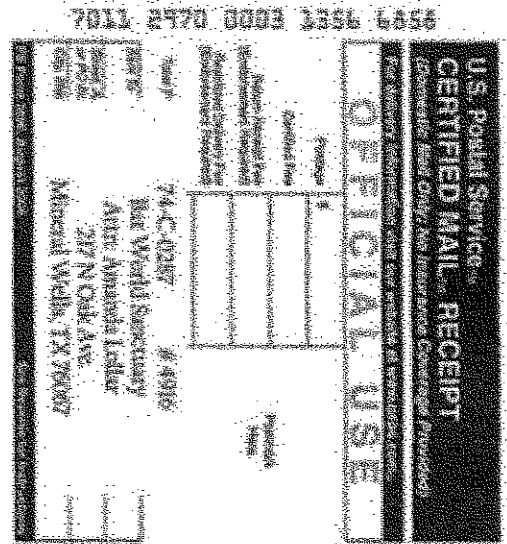
Hi All

I wanted to include another line about suffering in my previous analysis of this procedure.

I have reviewed the U-Tube footage and looked at the complaint about the bat that was mishandled by Ms. Amanda Lollar of the Bat World Sanctuary. This is indeed a violation of the AWA. Ms. Lollar should have sought veterinary assistance for the bat with dystocia. It would be one thing if she were only assisting a birth, but the moment Ms. Lollar realized this was a dystocia requiring an episiotomy, she should have taken the bat to her attending vet or a local veterinarian. Apologizing in the video to the bat does not solve the problem. This mother bat clearly experienced pain and suffering at Ms. Lollar's hand, so much so that it appeared to lose consciousness during the procedure. No anesthesia was given to the bat and no pain management was offered. I believe the mother bat could have survived if it had been properly anesthetized and the pup delivered using proper surgical techniques. It is possible the pup could also have survived if this case had been properly managed by a veterinarian.

Laurie J. Gage, D.V.M., Dipl. ACZM
USDA APHIS Large Cat Specialist

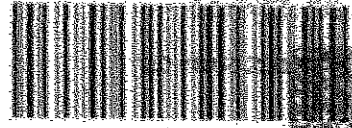
2



UNITED STATES DEPARTMENT OF AGRICULTURE
MARKETING & REGULATORY PROGRAMS
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
ANIMAL CARE
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X-RAY SCANNED

74-C-0287 #4916
Bar World Sanctuary
Attn: Amanda Lollar
217 N Oak Ave
Mineral

M
470

750 55 1 00 04/01/13
RETURN TO SENDER
UNCLAIMED
DEALS TO FORWARD
EC: 80528011059 *1470-04013-13-45

80528011059



From: D'igesualdo, Cynthia L - APHIS
Sent: Tuesday, April 10, 2012 02:05 PM
To: Ridenour, Randall - APHIS
Cc: McFadden, Gloria S - APHIS
Subject: RE: Returned Certified Mail (Cancel Letter)

Can we send this regular mail? She's a little far for me to hand deliver. Anyway, I can promise you she knows she's cancelled. Not happy with us and very glad to be rid of us.

Laura Russell

From: Wendy Connally
Sent: Monday, July 09, 2012 1:54 PM
To: 'sanctuary@batworld.org'
Cc: Megan Russell
Subject: Bat World Sanctuary + BRIT WNS Symposium

Hi Amanda,

Your invitation for the Bat World – BRIT WNS Symposium reached me this morning. **Thanks for your interest in protecting our wonderful bats in Texas and sharing information about White Nose Syndrome.** I think it's great when concerned folks rally together for a good cause; however, I have a few concerns about the information supporting your event. I know that the Bat World Sanctuary has been on the forefront of bat rehabilitation in Texas for some time now; however, there are just a few issues in your announcement I'd like to address.

As you may know, US Fish and Wildlife Service (USFWS) and Bat Conservation International have been the primary nodes coordinating WNS information, survey and response protocols, and research on this fast-moving, little understood disease. The USFWS website (<http://www.fws.gov/whitenosesyndrome/>) and conference calls every two weeks with biologists working on these issues provide the most contemporary information on the spread and impact of the fungus (*Geomyces destructans*, Gd) and the disease (White Nose Syndrome). This is the fifth year they've hosted leading national and international scientists and researchers, conservation practitioners and regulators at the WNS Symposium to receive the latest updates on Gd and WNS transmission, spread, conditions and responses – what's new, what's working, what's not. This focused group participates in workshops, information presentations, and action-based discussions – these working groups are the leaders in understanding and responding to this disease. There is a lot to know about the relationship between the Gd fungus and the WNS expression (visible effects, stress, and mortality).

WNS has not been detected in Oklahoma. The *fungus* that causes WNS was detected in western Oklahoma a few years back; however, despite many comprehensive additional surveys, it has not been detected again, nor has the disease WNS been detected anywhere in the state.

TPWD has funded surveys in the Panhandle in suitable areas closest to that fungal detection and BCI has done other work to survey for the disease. The fungus and its expression as WNS have not been detected in Texas. There is a **lot** of research going on right now to understand the conditions, sites, and bat species in which the fungus expresses as WNS – while we don't have it in Texas, we certainly want to be adequately prepared for detection and response. We will continue to monitor potential areas and are working on our statewide surveillance and response protocols this year with a working group – I'm working on the list of stakeholders and I can certainly include you in that list if you are interested in learning more.

There are currently no USFWS-approved protocols for the treatment and release of WNS-positive (WNS+) bats.

Bottom line is that we (Texas) would not want to accept WNS+ bats from outside of the state. And, per the Bat World Wildlife Rehabilitation Permit Provision 12, y'all are not authorized to transport from/to other states without coordinating written permission with TPWD. For interstate transfer to be a more regular occurrence, a special provision would have to be made on the permit explicitly; however, because we do not have WNS in Texas, TPWD would not permit WNS+ bats coming across state lines into Texas to any TPWD-permitted rehab facility, nor would we authorize acceptance of any bat from WNS+ states. We could not be certain that WNS+ bats would not pass the fungus or disease to *uninfected releasable bats in the facility*, and then the spores of the fungus could spread upon release of the healthy bats. Another concern would be that if a rehabbed infected bat appears to recover and was released, it could potentially spread the fungal spores and/or breed with indigenous bats (same species, of course) and have possible impacts to their fitness to fend off the disease.

In the event that WNS is detected in Texas, we would currently follow the established USFWS protocols for detection and response. When we get our state-specific protocols in place, TPWD will review all bat rehabilitator's permits and

may include some level of quarantine holding and transfer to a permitted scientific research facility, but would not include treatment or release until we know more about the disease. In order for any permitted bat rehabber to provide quarantine facilities, the permit would need to be amended to accommodate these activities, along with a *strong scientifically-supported reason for doing so*. Any quarantine practices in any facility must be sufficient to protect uninfected, indigenous bats in the same facility against infection and prevent the release of the fungal spores to the outside world where they could infect wild bats.

I'm a bit concerned with this statement: **"The cost of the symposium will be used to fund a new state-of-the-art sanctuary facility for the successful rescue, breeding, maintenance and eventual release of bats affected by WNS."** At this time, TPWD would not provide a permit for any facility to rescue, breed, maintain or (especially) release bats *which test positive for the fungus or WNS until peer-reviewed published research has shown that the treatment could be effective*. Additionally, the Bat World Wildlife Rehabilitation Permit Provision 15a prohibits breeding of any of the animals held under the authority of the permit. While I understand that you provide habitat for a wild maternity colony (*thank you!*), no captive, rehabbing, or nonreleasable bats can be bred at your rehabilitation facility under your permit. All rehab animals at any facility should be separated by sex to prevent breeding. Any future breeding, which would be directly related to an identified need to recover a bat species, would need to occur under other TPWD permit programs and conditions.

Please review the terms of your permit to address this statement: **"... live, rescued bats will be an integral part of the instruction throughout the day, but participants will not be handling them for the purposes of this symposium."** The Bat World Wildlife Rehabilitation Permit allows (Provision 10) *limited* permanent retention of non-releasable wildlife, on a *case-by-case basis*, for educational purposes IF approved by TPWD (see Texas Administrative Code §69.44. General Provisions. e. 1: *The department may permit the retention of non-releasable wildlife for approved educational, fostering, or socialization purposes, or for transfer to zoological, scientific, or educational permit holders. Requests must be made in writing to the department*). Using live bats during the symposium is fine if they are not bats currently under rehabilitative care and if they've been approved by TPWD to retain as non-releasable for education. I noticed on some of your past annual reports that you indicated several bats in some years that were transferred to "captive colony;" however, I'm unaware of any case-by-case approvals in our files which would authorize you to hold any non-releasable bats for educational purposes and y'all do not have an educational display permit for that purpose. It's possible in our recent turn over that maybe we are missing some authorization paperwork or we just need to update our files that you have a captive colony, appropriate facilities for non-releasable bats, and/or numbers and species of those now-captive bats? You could coordinate that update with Megan Russell if we're out of date on that information – we have had a lot of change in that program in the last several years, certainly as long as you've been operating the Sanctuary.

Please feel free to visit with Megan Russell (megan.russell@tpwd.state.tx.us) in our Nongame Permits shop or me if you need more information on any of the aspects above.

Your workshop is a great opportunity to reach quite a few people about bat conservation and this devastating disease. We appreciate your efforts!

All the best,

Wendy Connally, Program Lead
Texas Parks & Wildlife Department
*Rare Species, Nongame Permits, and
Texas Conservation Action Plan*
direct 512.389.4975
cell 512.461.6237
wendy.connally@tpwd.state.tx.us

Life's Better Outside!

Texas State Parks need \$4.6 million to help keep parks open

LEARN MORE [TPWD: Help State Parks](#)

Show what drives you!

1 APPEARANCES: (CONTINUED)

2 FOR THE PLAINTIFF: MARY CUMMINS
3 645 WEST 9TH
4 SUITE 110-140
5 LOS ANGELES, CALIFORNIA 90015

6 FOR THE DEFENDANT: JACKSON LEWIS LLP
7 BY: DEAN A. ROCCO
8 SANDRA J. MC MULLAN
9 ATTORNEYS AT LAW
10 725 SOUTH FIGUEROA STREET
11 SUITE 2500
12 LOS ANGELES, CALIFORNIA 90017
13
14
15
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1 EVERYTHING ON THE INTERNET.

2 THE COURT: I UNDERSTAND WHAT -- WHAT YOU CONTEND.
3 I'M NOT IN ASKING DEFENSE COUNSEL WHAT I JUST ASKED THEM
4 INDICATING, HINTING AT A BELIEF THAT MS. LOLLAR HAS MADE THESE
5 CALLS, POSTED THINGS IN VIOLATIONS OF COURT ORDER OR ON THE
6 INTERNET. I DON'T KNOW THESE THINGS WITH ANY DEGREE OF
7 CERTAINTY.

8 ALL I DO KNOW IS THAT THERE IS ENOUGH BAD BLOOD HERE
9 BETWEEN MS. CUMMINS AND MS. LOLLAR THAT IF MS. LOLLAR WERE MY
10 CLIENT, I WOULD CAUTION HER TO BE EXTREMELY CAREFUL TO NOT
11 PURPOSELY OR INADVERTENTLY BE THE SOURCE OF INFORMATION, BE IT
12 PUBLISHED ON THE INTERNET OR OTHERWISE USED OR MISUSED TO MS.
13 CUMMINS' DETRIMENT. IT'S GOING TO JUST PROLIFERATE PROCEEDINGS
14 HERE AND IN OTHER COURTS AND CAUSE UNNECESSARY UPSET TO BOTH
15 SIDES.

16 MS. CUMMINS: MS. LOLLAR ALREADY ADMITTED THAT SHE
17 POSTED THE INFORMATION. SHE'S NOT GONE PAST THE EIGHTH GRADE.
18 AND SHE THOUGHT SHE WAS ANONYMOUS. SHE DIDN'T REALIZE I CAN
19 SEE ALL THE SOURCE CODE AND EVERYTHING. FOR THE LAST YEAR,
20 SHE'S BEEN TAUNTING -- SHE EVEN EMAILED ME WHILE I WAS WAITING
21 FOR THIS HEARING TAUNTING ME WITH SOME -- SHE'S BEEN HIRING
22 GUYS TO LIKE FOLLOW ME AND TAKE VIDEOTAPES OF ME. AND THEN SHE
23 POSTS IT ON THE INTERNET AGAINST MY WISHES. SHE ADMITTED TO
24 POSTING THE INFORMATION. SHE JUST DIDN'T REALIZE SHE WASN'T

1 THE COURT: MS. CUMMINS, AGAIN, I CAN'T BASED ON WHAT
2 I KNOW SAY THAT'S ABSOLUTELY TRUE OR THAT'S FALSE OR ANYTHING
3 IN BETWEEN. ALL I CAN DO IS RESPECTFULLY URGE COUNSEL TO TELL
4 MS. LOLLAR THAT IF SHE EVER HAS OR HAS EVER CONSIDERED DOING
5 ANY OF THE THINGS YOU ALLEGE, THAT SHE NOT DO IT, WHETHER OR
6 NOT SHE HAS IN THE PAST.

7 FROM THIS DAY GOING FORWARD, I THINK SHE SHOULD BE
8 STRONGLY CAUTIONED THAT SHE IS JUST CAUSING UPSET TO MS.
9 CUMMINS, WHICH WILL CAUSE UPSET, EXPENSE, AND DIFFICULTY IN
10 COURTS HERE AND ELSEWHERE FOR HERSELF OVER TIME IF SHE ENGAGES
11 IN ANY OF THE CONDUCT WHICH MS. CUMMINS BELIEVES SHE HAS
12 ENGAGED IN.

13 SO, SOMETIMES YOU JUST HAVE TO BE VERY CAREFUL TO
14 AVOID THE KINDS OF ISSUES THAT ARE ARISING NOW.

15 I'D ALSO TELL HER IF SHE HAS ANY FRIENDS, RELATIVES,
16 ACQUAINTANCES WHO MIGHT UNDERTAKE ACTIONS TO IRRITATE MS.
17 CUMMINS OUT OF FEALTY TO MS. LOLLAR, SHE SHOULD TELL HER CLOSE
18 FRIENDS, FAMILY, AND ANYBODY WHO MIGHT DO IT, PLEASE DON'T.

19 MS. CUMMINS: YOUR HONOR, SHE HIRED A MAN TO ASSAULT
20 ME. AND SHE HIRED HIM TO VIDEOTAPE IT. AND THEN SHE POSTED
21 THE VIDEO ON HER OWN UTUBE CHANNEL. I FILED ANOTHER POLICE
22 REPORT. NOW, I HAVE TO GET A RESTRAINING ORDER ON HER.

23 THE COURT: I HEAR WHAT YOU'RE SAYING. AND, AGAIN,
24 THAT'S ALL THE MORE REASON WHY I SUGGEST TO COUNSEL WHAT I

1 AND, AGAIN, I'M SORRY FOR THE UPSET THAT HAS BEEN
2 CAUSED TO YOU BY VARIOUS ACTIONS TAKEN AGAINST YOU THAT HAVE
3 RESULTED IN THE FILING OF THE POLICE REPORT THAT I SEE HERE AND
4 OTHER POLICE REPORTS. BUT I CANNOT GRANT THE MOTION AT THIS
5 TIME.

6 MS. CUMMINS: OKAY.

7 THE COURT: ALL RIGHT. THANK YOU SO MUCH.

8 MR. ROCCO: THANK YOU.

9 THE COURT: COURT IS IN RECESS.

10 (PROCEEDINGS ADJOURNED AT 10:26 A.M.)
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12
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21
22
23
24

NO. 352-248169-10

1
 2 **BAT WORLD SANCTUARY and**) **IN THE DISTRICT COURT**
 AMANDA LOLLAR,)
 3)
 Plaintiffs,)
 4)
 VS.) **TARRANT COUNTY, TEXAS**
 5)
 MARY CUMMINS,)
 6)
)
 7)
 Defendant.) **352ND JUDICIAL DISTRICT**
 8

ORAL AND VIDEOTAPED DEPOSITION OF

AMANDA LOLLAR

NOVEMBER 8, 2011

15 **ORAL AND VIDEOTAPED DEPOSITION OF AMANDA LOLLAR,**
 16 **produced as a witness at the instance of the DEFENDANT,**
 17 **and duly sworn, was taken in the above-styled and**
 18 **numbered cause on November 8, 2011, from 10:00 a.m. to**
 19 **2:25 p.m., before Claudia White, CSR in and for the**
 20 **State of Texas, reported by machine shorthand, at the**
 21 **law offices of Stephanie Patton, 2101 Moneda, Haltom**
 22 **City, Texas, pursuant to the Texas Rules of Civil**
 23 **Procedure.**
 24

Job No. 12134

1 A. I would assume myself and several volunteers.

2 Q. This was May 25th.

3 A. The same answer, I would assume myself and
4 several volunteers.

5 Q. What volunteers were there?

6 A. I'm trying to remember who was volunteering
7 then. I can't recall exactly. I'd have to check my
8 records.

9 Q. So if I were to ask you what volunteers were
10 there May 25th you would be able to give me a list?

11 A. Yes.

12 (Exhibit 22 marked.)

13 Q. (BY MS. CUMMINS) This is Exhibit 22. Can you
14 tell me what that is?

15 A. It is a post made to my list serve.

16 Q. Did you make that post?

17 A. I can't tell who made it. Yeah, it says Bat
18 World Sanctuary, so, yes, I made it.

19 Q. Could you please read that?

20 A. It says: Yes, she also has a criminal record.
21 And it lists case number and several different legal --
22 Court 1484EA, PC PTY theft, ACQ credit card W/O cons.
23 Another one says forged name on credit card, another one
24 says theft by forgery, invalid credit card. Another one
25 that says theft of property.

1 Other lawsuits involve cyber squatting,
2 which she lost via default judgment. And then it says
3 FA Beverly Hills, Incorporated versus Mary Cummins, ET,
4 neighbor dispute which she promptly settled, and
5 defamation, which plaintiff abandoned because they were
6 able to get rid of her defamation. She also goes by
7 Mary Cummins, Mary Cummins Cobb, and Mary Katherine
8 Cummins, and sometimes her name shows up as Mary
9 Cummings. She has used the same e-mail for years. She
10 has hundreds of aliases she uses, as well. Right now
11 she's encouraging her Facebook friends to repost the
12 videos and defamation I've managed to get removed.
13 These are the same items she was ordered to remove by
14 the court, so she is now in contempt. She either thinks
15 she's above the law or that she will never -- or that it
16 will never catch up to her. She typically bullies and
17 harasses her victims into giving up, but that's not
18 going to work for her this time around. Thank you,
19 Debbie, for your words of encouragement on our blog.
20 That really means a lot to us.

21 Q. Can you hand that back to me.

22 A. (Witness complies.)

23 Q. Now, everything that you wrote there, is that
24 the truth?

25 A. The truth as I know it.

1 Q. Can you hand me the other page.

2 A. (Witness complies.)

3 Q. So you believe I'm a convicted criminal?

4 A. We have information that shows that you have
5 been convicted of crimes.

6 Q. Where is that information?

7 A. I have it in my computer.

8 Q. So if I ask you for evidence that shows I've
9 been convicted of crimes, you'll be able to give me
10 that?

11 A. Yes.

12 Q. What is that evidence?

13 A. It's court documents.

14 Q. You have court documents which shows I have
15 been convicted of crimes?

16 A. That shows Mary Cummins, yes, has been
17 convicted of crimes.

18 Q. Mary -- a Mary Cummins any Mary Cummins or me?

19 A. It says Mary Cummins.

20 Q. So you believe a Mary Cummins. It could be one
21 of thousands in the United States.

22 MR. TURNER: Let me interrupt. You're
23 wanting to go into matters that concern another lawsuit
24 that you filed.

25 MS. CUMMINS: I can ask any questions.

From: Richard Evanns <enforcements@rocketmail.com>
Subject: **Re: Case # BS140207 - Lollar vs Cummins**
Date: February 18, 2013 4:11:05 PM PST
To: Mary Cummins <mmaryinla@aol.com>
Reply-To: Richard Evanns <enforcements@rocketmail.com>
✉ 1 Attachment, 5.4 KB

Ms. Cummins:

It was not my process server, as I said. In fact the declaration of non-service was the declaration filed by my servers that they had attempted to serve the papers but been unable to. My attempts to do the service ended then and who did what after that is not anything I was involved in.

Regarding advising my clients to stop harassing you, I assure you the clients are well aware of your contentions regarding this serve (you have emailed everyone involved multiple times it seems) and that I would not and do not condone any improper behavior on their part, nor do I wish to engage in any such behavior myself.

However, my involvement with the clients herein is limited to certain matters, and I am not general counsel to any of the parties involved.

Therefore, if you have a gripe or complaint over anything that my clients do, it is them that you should take it up with and not me. I do not know the circumstances of the service of the papers, and I am sure everyone's story on that is going to be different--and I do not wish to or need to get involved in that at this time.

The judgment has been entered in California and unless and until my clients instruct me to take further action on this case, my involvement with it is essentially over.

EVANNS COLLECTION LAW FIRM

Richard Omar Evanns
Attorney at Law
515 South Flower Street, 36th Floor
Los Angeles, CA 90071
T: (213)404-1002 F: (213)236-3533
Enforcements@rocketmail.com
Evannscollectionlaw.com on the world wide web.

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From: Mary Cummins <mmmaryinla@aol.com>
To: Richard Evanns <enforcements@rocketmail.com>
Sent: Monday, February 18, 2013 3:17 PM
Subject: Re: Case # BS140207 - Lollar vs Cummins

You didn't refile. I doubt that was your process server. If Lollar is your client, could you please tell her to cease and desist from harassing me and having me assaulted. That is criminal behavior.

Case Number: BS140207
Case Title: BAT WORLD SANCTUARY ET AL VS MARY CUMMINS
Case Type: Sister State Judgment (General Jurisdiction)
Filing Date: 11/6/2012

The following documents are available electronically.

Click on the corresponding checkbox to select a document to download. You may select up to 10 documents for each download.

Click on the "Submit" button to continue.

Select	Date Filed	Document	Number of Pages	Cost
<input type="checkbox"/>	1/4/2013	DECLARATION OF NON SERVICE	2	\$7.50
<input type="checkbox"/>	11/9/2012	JUDGMENT BASED ON SISTER-STATE JUDGMENT	1	\$7.50
<input type="checkbox"/>	11/9/2012	JUDGMENT BASED ON SISTER-STATE JUDGMENT	1	\$7.50
<input type="checkbox"/>	11/6/2012	APPLICATION FOR ENTRY OF JUDGMENT ON SISTER STATE JUDGEMENT	15	\$7.85
<input type="checkbox"/>	11/6/2012	APPLICATION FOR ENTRY OF JUDGMENT ON SISTER-STATE JUDGMENT	3	\$7.50

On Feb 18, 2013, at 1:32 PM, Richard Evanns wrote:

Ms. Cummins:

The process server used was not employed or instructed by me. I don't know if it was the clients, the client's attorney, etc. who sent the process server.

EVANNS COLLECTION LAW FIRM

Richard Omar Evanns
Attorney at Law

515 South Flower Street, 36th Floor
Los Angeles, CA 90071

T: (213)404-1002 F: (213)236-3533

Enforcements@rocketmail.com

Evannscollectionlaw.com on the world wide web.

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From: Mary Cummins <mmmaryinla@aol.com>
To: enforcements@rocketmail.com
Sent: Monday, February 18, 2013 10:50 AM
Subject: Case # BS140207 - Lollar vs Cummins

Your process server entered private property yesterday without permission. His friend was videotaping. I told him I do not allow him to videotape me. I do not allow him to post the video. He asked to go outside to give me documents. I started to go outside but did not go outside onto the public property because I'd then be out of view of my witnesses. Your process server turned around and threw the folded documents at me at close range striking me with them. I'm a female and 5'8". That was totally unnecessary and legally assault. He could have dropped the papers or handed them to me. He then said to his camera guy "did you get that? that's good enough." Please, ask to see his video. Also, please, give me his name so I can file charges and report him. I had five witnesses who saw this. Did you order this process server or did Randy Turner or Amanda Lollar?

Mary Cummins
MMMARYinLA@AOL.COM

<mesmallsm.jpg>

Mary Cummins
MMMARYinLA@AOL.COM



From: "Galstyan, Sarah" <Sarah.Galstyan@owb.com>
Subject: **Urgent From OneWest Bank PLEASE CALL OFFICE**
Date: March 18, 2013 3:51:22 PM PDT
To: "mmaryinla@aol.com" <mmaryinla@aol.com>

Hello Ms. Cobb,

My name is Sarah and I'm trying to get in contact with you. I'm from OneWest Bank The Bel Air Office I am the personal Banker. Can you please give me a call or call the office at 310-475-4594 this is in regards to your account. The phone number we have on file in a business phone number and I don't want to leave a message there. Please call ASAP this is in regards to your account.

Sarah Galstyan
OneWest Bank
Personal Banker
310-475-4594

9



Member FDIC

03/25/2013

Animal Advocates
C/O: Mary Katherine Cummins-Cobb
645 W 9TH ST # 110-140
Los Angeles, CA 90015-1640

Re: Account #:

Dear Mary Katherine Cummins-Cobb,

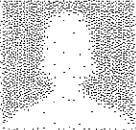
We have been trying to reach you regarding recent activity on the above referenced account. Please contact the branch at your earliest convenience. I included my contact information below for easy reference.

11 310-887-0101
C/O MARY KATHERINE CUMMINS-COBB

Sincerely,

Katerina Karagiannides
Sr. Branch Manager
First Bank
9145 Wilshire Blvd.
Beverly Hills, CA 90210
T: 310-887-0101
O: 310-777-1900
F: 310-273-2068
Katerina.Karagiannides@FBOL.com

contact the branch at your earliest convenience. I included my contact information below for easy reference.
We have been trying to reach you regarding recent activity on the above referenced account. Please



Sar Tann I'm sure you got a restraining order...Did the courts do anything else with her?

April 25 at 3:03pm · Like · 1



Stand up to Cyber-Stalkers You can't get a restraining order unless someone threatens physical harm to you, which she has not yet done.

April 25 at 5:46pm · Edited · Like · 1

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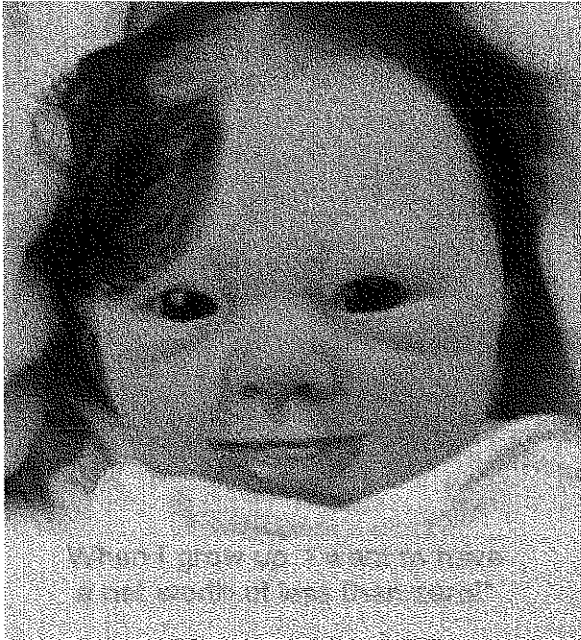


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Is this Mary Cummins Baby Photo?

May 5, 2013 by [beatmarycummins](#)

Mary Cummins claims she is indigent (<http://marycumminss.files.wordpress.com/2013/05/mary-cummins-indigence-hearing.pdf>) and has “a net worth less than zero.” Did Mary Cummins aspire to be indigent all along?



(<http://marycumminss.files.wordpress.com/2013/05/mary-cummins-baby-photo.jpg>)

This entry was posted in [Uncategorized](#). Bookmark the [permalink](#).

3 thoughts on “Is this Mary Cummins Baby Photo?”

1. Peach Morgan says:

[May 10, 2013 at 2:21 pm](#)

Oh my! No wonder she wound up indigent. It would be hard to be successful with that signature facial expression. Kind of creepy. OMGosh, I just remembered her stating that Super Star

attorney, Randy Turner, attorney, Bailey & Galyen was not of her liking. Thank God. I would be horrified if this thing liked me!!!!

Reply

2. The Joker says:

May 10, 2013 at 2:48 am

She had more hair back then. Seriously! Look how thin her spazzed out hair is in the deposition videos.

Reply

3. Roadrunner says:

May 9, 2013 at 4:17 am

Is that a real photo of Mary Cummins when she was a baby? If not, it sure looks like her! It is uncanny how 60-something years later you can still see the same features from when she was a baby.

Reply

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