

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

MARY CUMMINS)	CIVIL ACTION
Plaintiff,)	
)	
vs.)	
AMANDA LOLLAR, BAT WORLD)	Civil Action No.: 4:12-CV-00560-Y
SANCTUARY, JOHN DOES 1-10)	
)	
Defendants.)	
)	
)	JURY

**PLAINTIFF’S REPLY TO DEFENDANTS’ MOTION FOR SANCTIONS; PLAINTIFF’S
REQUEST FOR SANCTIONS FOR DISCOVERY, MOTION ABUSE, VIOLATION OF
PROTECTIVE ORDER ON MEDICAL RECORDS AND HARASSMENT**

Plaintiff Mary Cummins replies to Defendants’ Motion for Sanctions. Defendants never met to confer about this motion before filing it. There is no signed meet and confer in their filing. This motion for sanctions was completely unnecessary and based on fraudulent statements and actions by Defendant’s attorney Randy Turner. Plaintiff replies to Defendants’ false statements and accusations. Plaintiff requests sanctions against Defendants for failure to meet and confer, motion abuse, discovery abuse, failure to abide by a protective order on medical records, harassment and general abuse of the judicial process.

INTRODUCTION

Defendants demanded that Plaintiff have an in person settlement conference in Texas (Declaration). Plaintiff informed Defendants quite a few times that Plaintiff cannot travel or sit for a deposition or settlement meeting because of her very serious and painful back injury which

is the basis of this lawsuit (Exhibits 1, 2). Plaintiff requested meeting on the phone, by brief or in Los Angeles, California. Defendants refused all of these offers and insisted that Plaintiff could only meet in Defendants' attorney's legal office in Texas.

Plaintiff recently filed Motion to Reconsider Motion for Stay for medical reasons including a doctor's letter confirming Plaintiff's inability to travel or sit for a meeting. Plaintiff would agree to settlement conference by phone or brief for this reason. Plaintiff is willing to provide other evidence under seal for the Judge's eyes, ears only. Defendants' attorney Randy Turner has been extremely offensive, harassing and threatening to Plaintiff's medical doctor on the phone demanding records which are prohibited by the court order in this case. Plaintiff's doctor a 70 year old man was almost in tears on the phone because Turner had threatened to sue him, sanction him and throw him in jail because he refused to hand over records for gynecological and other records which HE DOES NOT HAVE. Turner is not allowed to request these as per this court's order. Plaintiff will give this evidence to the Judge only. If Turner receives this evidence, he will post it on the Internet to further harass, oppress, humiliate and abuse Plaintiff's doctor. Plaintiff will also provide another letter from another doctor about Plaintiff's condition for the Judge's eyes only so Turner cannot harass this doctor as well.

Defendants' attorney Randy Turner went ahead and scheduled an in person settlement conference in his office knowing full well Plaintiff could never attend. There was no "mutually agreement upon time or location" as per the court order. Plaintiff clearly stated she could not and would not be at the meeting because of her back injury.

Plaintiff has made two settlement offers in this case in writing (Exhibits 3, 4) as the court instructed parties to try to settle in the 26f agreement. Defendants have never made a settlement

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offer. Defendants did not reply to either thereby refusing to even attempt to settle against the court's order. Therefore Defendants' request for a settlement conference was merely to abuse the judicial process and physically and emotionally harass Plaintiff.

Plaintiff's first settlement offers were for all out of pocket expenses paid and unpaid for medical treatment which are in collections, costs of this lawsuit and a nominal amount for pain and suffering for a total amount of around \$10,000.

When Plaintiff initially filed the lawsuit Plaintiff had medical insurance which did not pay for treatment so Plaintiff paid out of pocket. Because of this injury Plaintiff has not been able to work, became penniless and could not afford further treatment at that time. Because Plaintiff became penniless Plaintiff finally qualified for Medi-Cal which is free California state insurance. Plaintiff no longer has to pay for any medical expenses not even the \$200,000 plus estimate for surgery as long as she has this insurance. Insurance has probably paid for at least \$30,000 in treatment so far. If the case proceeds to trial Plaintiff must demand all medical expenses to reimburse Medi-Cal as that is California state law.

Defendants originally stated in sworn deposition November 8, 2011 that they had slip and fall insurance for the premises and other liability insurance. Plaintiff requested these documents in discovery. March 25, 2015 Defendants refused to give the insurance information to Plaintiff in discovery stating it does not exist. That means Defendants committed perjury in sworn deposition or they are currently committing perjury.

The other statements made by Defendants about other past litigation from years ago are false or not relevant to this case for personal injury. Defendants bring up these things to defame Plaintiff, obfuscate the real issues, bury the Court in paper and try to show Plaintiff in a false

light to this court. Plaintiff will not respond to the other cases not related to the charges in this case for this reason.

Plaintiff did file this case originally in California Federal court due to diversity of parties. The main purpose was because all Plaintiff's witnesses, experts, doctors, physical therapists and Plaintiff herself are in California. Defendants filed to move the case to Texas so that Randy Turner could represent them. The Court ruled that if there is any other court anywhere that could possibly have jurisdiction over the case for any reason, the case may be moved there even though there is diversity of parties. While the premises where the injury took place are in Palo Pinto County, Texas they have been sold. The building was in such disrepair, not up to code, had no occupancy slip, had many building and safety, health department violations and was in such poor condition as per Plaintiffs' own statements that the building was completely gutted. There is no reason to visit the injury premises for this reason as the illegal door used to illegally trespass onto the neighbor's property are gone and the building has been substantially altered.

The initial order for a settlement conference was August 22, 2014 doc #121. The order was for "a conference at a time and location mutually agreeable to the parties." Plaintiff told Defendants she would agree to phone conference or meeting in Los Angeles when she is physically able. Defendants requested in person meeting in the office of Randy Turner. Plaintiff stated she could not travel. Second order was June 16, 2015 to have an in person meeting no later than July 13, 2015 and file the report no later than July 20, 2015. Plaintiff again stated she could not travel and requested a stay. Plaintiff attempted to have a settlement conference by phone or brief but Defendants refused. Plaintiff is willing to have a settlement conference via the phone or brief but cannot physically meet in person.

ARGUMENT AND AUTHORITIES

1. PLAINTIFF SHOULD NOT OWE SANCTIONS

Plaintiff agreed to a settlement conference by phone, brief or in person in Los Angeles, California at a later date (Previous Exhibits, Declaration). Plaintiff clearly notified Defendants that she could not make a settlement conference in Texas. Defendants did not reply thereby refusing to meet. For this reason there should be no sanctions.

2. DISCOVERY ABUSE

The Court in this case advised both parties in its March 3, 2014 Order Doc #98 “to the per curium opinion in the Dondi Properties Corp. v. Commerce Savings and Loan Assoc., 121 F.R.D. 284 (N.D. Tex. 1988) which sets forth the conduct for counsel to follow throughout litigation.” The Court further stated that “sanctions will imposed upon any party conducting or opposing discovery unreasonably, in bad faith, or otherwise not in compliance with the rules or Dondi.” Defendants have repeatedly conducted discovery for the sole purpose of harassment, embarrassment and oppression of Plaintiff and Plaintiff’s doctors.

Defendants’ attorney Randy Turner was only allowed medical records relating to Plaintiff’s back and back injury for a certain amount of time. Turner sent in a subpoena and request to Plaintiff’s doctors for these records. Doctors responded and handed over all records. Randy Turner then called up Dr. Samuel Berkman repeatedly on the phone threatening legal action, contempt charges, sanctions, harassing him, yelling at him demanding the exact documents the court stated he was not allowed to have, namely gynecological and other records of Plaintiff. Dr. Berkman handed over every single record in his possession to Turner but Turner was not satisfied as they did not include gynecological or other records. Dr. Berkman does not have any

gynecological or other records of Plaintiff yet Turner was convinced he did and kept demanding them. Plaintiff will give physical evidence of this to the Judge only under seal. If Turner were to receive this evidence he would immediately post it online to further harass, oppress, embarrass Dr. Berkman. Plaintiff requests that Turner be sanctioned for discovery abuse.

2. VIOLATION OF PROTECTIVE ORDER OF MEDICAL RECORDS

Medical records in discovery in this case are covered by a protective order Doc #135 March 16, 2015. This order was agreed to by both parties and the court. The contents of and the records cannot be shared publicly or posted online. Immediately upon receiving medical records Defendant Amanda Lollar posted them online (Exhibit 5). Defendant Lollar posted the exact medical record which was a medical release form and the contents. In Lollar's website Lollar states that Plaintiff has "communicable diseases and mental illness" which is completely false. Lollar goes on to state Plaintiff is "under the care of a psychologist" which is false. Lollar goes on to post revolting, nude photoshopped images of Plaintiff's head on a naked obese woman's body.

Plaintiff contacted Daniel Sullivan about this. Sullivan stated he would get his client to remove this medical record but it has never been removed (Exhibit 6). Instead it's been reposted in at least 30 other blogs and websites owned and operated by Defendants. It's even included in Defendants' attorney's business website which was previously attached as exhibit in this case.

3. MOTION ABUSE, ABUSE OF PROCESS, JUDICIAL FRAUD, PERJURY

As soon as Defendants' attorneys were notified that Plaintiff could not stand, could barely sit, was in incredible pain, could only sit at a desk for a few minutes at a time, could not fly to Texas, Defendant's attorney Randy Turner started committing motion abuse and abuse of the judicial

process. He filed a new lawsuit, motion after motion in current lawsuit, requested multiple documents, meetings...when he knew full well Plaintiff physically could not do these things. Turner did these things hoping Plaintiff could not reply and would lose this case by default as is his modus operandi.

Randy Turner has a long history of abusing the judicial process, being in contempt of court orders, committing motion abuse, perjury and fraud. In Plaintiff's reply to Defendant's Motion to Substitute Randy Turner as the attorney in this case Doc# 50 Exhibits 1-11 Plaintiff included an email in which Turner in writing admitted he previously committed motion abuse and threatened to do so again if Plaintiff refused to sign an impossible court order against herself.

Randy Turner recently filed a third identical motion to compel post trial discovery in the 352-24869-10 case. The two previous motions were lost through operation of law as the court did not set a hearing or hear the motion within 75 days in 2013 and 2014. Nonetheless Randy Turner contacted Judge Mark Pittman to set a hearing and he did. Plaintiff filed a reply noting the two previous identical motions which were lost by operation of law. Plaintiff also filed Motion for Telephonic Appearance which had previously been mandated and allowed in that court by the Appeals Court. Judge Mark Pittman then signed a court order (Exhibit 7) stating that he will only allow parties to appear in person in the court room in Texas in this specific case. Plaintiff would not be allowed to appear by phone. Plaintiff filed objection to court order in that court and in the Second Court of Appeals¹ as the order was unconstitutional. Judge Pittman then recused himself

¹ Second Court of Appeals 02-12-00285 Cummins v Lollar <http://www.search.txcourts.gov/Case.aspx?cn=02-12-00285-CV&coa=coa02>

from the case with no explanation and referred it to the supervisor Judge. That Judge assigned it to another Judge. Plaintiff is allowed to appear by phone in that case.

45 days ago Randy Turner filed a frivolous and meritless new lawsuit against Plaintiff in Texas for defamation and breach of contract case#20015-002259-2. Turner states that Plaintiff reposted everything which was ordered removed in a court order which the appeals court ruled was unconstitutional. The complaint he signed is false, contains judicial fraud and perjury. Turner also stated there was breach of contract even though the appeals court ruled there was no breach of contract. Turner did this to abuse the judicial process, harass Plaintiff and in the hopes that Plaintiff cannot respond due to her back injury so he could win by default. Plaintiff will be filing motion to dismiss per the Defamation Mitigation Act (Turner never notified Plaintiff what he feels is defamatory and never requested anything edited or deleted ever), the Citizen Participation Act (Turner filed the suit so Plaintiff would not report Defendants to authorities for multiple violations of Animal Welfare Act and other violations) and failure to state a claim as it includes not one bit of fact. Plaintiff still has never been told what Defendants think Plaintiff has written that is allegedly defamatory in five years of litigation in Texas. Most of the items in the court order were written by Defendant Lollar herself, government agencies or others. Other things stated was 100% the absolute truth based on referenced facts.

Plaintiff filed a waiver of service so Turner would not send his process server after Plaintiff in the 20015-00259-2 case. Previous process servers sent by Turner were paid over \$750 to trespass, harass, hit Plaintiff with papers while they videotaped it using hidden cameras then posted it on the Internet. Plaintiff was even once lured 1.5 hours from her home with the story

that a baby squirrel would die. Plaintiff was lured to a boarded up Motel 6 parking lot to be again served by trickery and videotaped. Lollar posted the video to harass Plaintiff.

In the case Linda Charles v Humane Society of North Texas case #106485-A filed in St Bernard Parish, Louisiana Randy Turner represented the Humane Society. This case was covered in the 2009 documentary "Mine" about dogs lost and reunited in hurricane Katrina. In the movie Turner played himself and was the sole villain of the documentary mocked by many reviewers for his "cruelty" and "racism." Turner defied a Louisiana Judge's 2006 order to return the stolen dog "Precious." Instead Turner committed motion abuse and papered Linda Charles until she could not afford to respond. "Precious" was the only dog not returned to its rightful owner because of the abuse of process committed by Randy Turner.

May 2011 Randy Turner sent a threatening letter to frivolously sue Indybay if they did not remove an article written about Lollar. ACLU-NC represents Indybay and replied². ACLU-NC quoted the law and refused to remove the article. This is just more evidence of Randy Turner abusing the judicial process in order to bully people to get his way. Randy Turner continues this same abusive behavior in this case in this court to this very day.

CONCLUSION

Based upon the foregoing matters, Plaintiff urges the Court to deny Defendants' motion for sanctions. Plaintiff urges the Court to grant sanctions against Defendants for discovery abuse,

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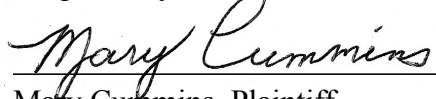
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² ACLU-NC letter to Randy Turner stating they will not remove an article https://www.aclunc.org/sites/default/files/asset_upload_file985_9987.pdf

abuse of the judicial process, judicial fraud, perjury and violation of a court protective order on medical records.

DATED: July 12, 2015

Respectfully submitted,

A handwritten signature in cursive script that reads "Mary Cummins". The signature is written in black ink and is positioned above a horizontal line.

Mary Cummins, Plaintiff

645 W. 9th St. #110-140

Los Angeles, CA 90015-1640

In Pro Per

Direct: (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. This motion was written by me, Mary Cummins, a pro se who is not an attorney.
3. Every statement in the motion is the absolute truth to the best of my knowledge and can be verified with physical exhibits and evidence.
4. Attached to PLAINTIFF'S REPLY TO DEFENDANTS' MOTION FOR SANCTIONS; PLAINTIFF'S REQUEST FOR SANCTIONS FOR DISCOVERY, MOTION ABUSE, VIOLATION OF PROTECTIVE ORDER ON MEDICAL RECORDS AND HARASSMENT as Exhibit 1 is a true and correct copy of a fax I sent to Randy Turner stating I cannot travel or sit for a meeting.
5. Attached to PLAINTIFF'S REPLY TO DEFENDANTS' MOTION FOR SANCTIONS; PLAINTIFF'S REQUEST FOR SANCTIONS FOR DISCOVERY, MOTION ABUSE, VIOLATION OF PROTECTIVE ORDER ON MEDICAL RECORDS AND HARASSMENT as Exhibit 2 is a true and correct copy of a fax I sent to Randy Turner stating I cannot travel or sit for a meeting.
6. Attached to PLAINTIFF'S REPLY TO DEFENDANTS' MOTION FOR SANCTIONS; PLAINTIFF'S REQUEST FOR SANCTIONS FOR DISCOVERY, MOTION ABUSE, VIOLATION OF PROTECTIVE ORDER ON MEDICAL RECORDS AND HARASSMENT as Exhibit 3 is a true and correct copy of a settlement offer I made to Randy Turner.
7. Attached to PLAINTIFF'S REPLY TO DEFENDANTS' MOTION FOR SANCTIONS; PLAINTIFF'S REQUEST FOR SANCTIONS FOR

PLAINTIFF'S REPLY TO DEFENDANTS' MOTION FOR SANCTIONS; PLAINTIFF'S REQUEST FOR SANCTIONS FOR DISCOVERY, MOTION ABUSE, VIOLATION OF PROTECTIVE ORDER ON MEDICAL RECORDS AND HARASSMENT

DISCOVERY, MOTION ABUSE, VIOLATION OF PROTECTIVE ORDER ON MEDICAL RECORDS AND HARASSMENT as Exhibit 4 is a true and correct copy of a settlement offer I made to Randy Turner.

8. Attached to PLAINTIFF'S REPLY TO DEFENDANTS' MOTION FOR SANCTIONS; PLAINTIFF'S REQUEST FOR SANCTIONS FOR DISCOVERY, MOTION ABUSE, VIOLATION OF PROTECTIVE ORDER ON MEDICAL RECORDS AND HARASSMENT as Exhibit 5 is a true and correct copy of Amanda Lollar's web page where she posted my medical record and posted the contents of my medical record.
9. Attached to PLAINTIFF'S REPLY TO DEFENDANTS' MOTION FOR SANCTIONS; PLAINTIFF'S REQUEST FOR SANCTIONS FOR DISCOVERY, MOTION ABUSE, VIOLATION OF PROTECTIVE ORDER ON MEDICAL RECORDS AND HARASSMENT as Exhibit 6 is a true and correct copy of an email exchange between me and Daniel Sullivan about my medical records not being removed from the Internet.
10. Attached to PLAINTIFF'S REPLY TO DEFENDANTS' MOTION FOR SANCTIONS; PLAINTIFF'S REQUEST FOR SANCTIONS FOR DISCOVERY, MOTION ABUSE, VIOLATION OF PROTECTIVE ORDER ON MEDICAL RECORDS AND HARASSMENT as Exhibit 7 is a true and correct copy of a court order signed by Judge Mark Pittman stating parties may only appear in person in my specific case.
11. I cannot sit for a deposition or settlement conference. I cannot travel.
12. I am willing to turn over to the court only physical evidence that Randy Turner harassed, threatened Dr Samuel Berkman.
13. I am willing to turn over to the court only another letter from another doctor stating I cannot travel or sit for a meeting.

14. I am willing to give the court any other evidence or documents that it requests.

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

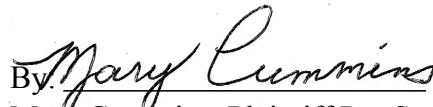
Executed on July 12, 2015 at Los Angeles, California.

By: 
MARY CUMMINS

CERTIFICATE OF SERVICE

I, Mary Cummins, hereby certify that a copy of **PLAINTIFF'S REPLY TO DEFENDANTS' MOTION FOR SANCTIONS; PLAINTIFF'S REQUEST FOR SANCTIONS FOR DISCOVERY, MOTION ABUSE, VIOLATION OF PROTECTIVE ORDER ON MEDICAL RECORDS AND HARASSMENT** was served on the Defendants' Attorneys of record by CM/ECF, FAX and EMAIL at,

Randy Turner
Daniel Sullivan
Bailey & Galyen
1300 Summit Ave. #650
Fort Worth, Texas 76102
rturner@galyen.com
dsullivan@galyen.com

By: 
Mary Cummins, Plaintiff Pro Se
July 12, 2015

PLAINTIFF'S REPLY TO DEFENDANTS' MOTION FOR SANCTIONS; PLAINTIFF'S REQUEST FOR SANCTIONS FOR DISCOVERY, MOTION ABUSE, VIOLATION OF PROTECTIVE ORDER ON MEDICAL RECORDS AND HARASSMENT

Mary Cummins
645 W 9th St #110-140
Los Angeles, CA 90015
(310) 877 4770
mmmaryinla@aol.com

June 17, 2015

As per telefax: 817 276 6010
Randy Turner
Bailey Galyen
6300 Summit #650
Fort Worth, Texas 76102

RE: June 17, 2015 fax

I just received the above referenced fax. I cannot physically fly to Texas or meet in person. I will be filing motion to reconsider motion for stay as soon as I receive a letter from my doctor who is out of town. I cannot sit or stand for more than a few minutes at a time. I cannot travel until I get surgery. If we ever do meet in this case, I refuse to meet with Mr Turner due to his extremely inappropriate leering and threatening behavior and the harassing and revolting behavior of his client. I would never agree to a videotaped meeting. I would only agree to meet with Daniel Sullivan and not in the office of Bailey & Galyen but some place neutral and public.

When you get the doctor letter I do not allow you, anyone in your office, your client Lollar or her friends to communicate with my doctor or any of my doctors on the phone. Even though Judge Means told you, you were not allowed any records unrelated to my back (i.e. gynecological, breast records) you threatened, harassed Dr Berkman on the phone demanding those records which he does not have. You threatened to sue him and find him in contempt if he didn't give you records he did not have. You made Dr Berkman extremely upset with your unprofessional and threatening vile behavior. I have never met such an evil person as you, Mr Turner.

I previously made a settlement offer to Daniel Sullivan. He stated Turner refused the offer. Therefore having a settlement conference with the same offer and reply is pointless. I make the same offer here for legal purposes though I've now added pain, suffering and legal expenses. If you don't agree with this, there is no reason to meet.

I request all out of pocket medical expenses paid and owed. I have two medical bills in collections. Since I was approved for Medi-Cal insurance I have not had to pay for anything. If we go to trial and I win, I must request medical bills for Medi-Cal which will be well over \$200,000 with surgery and follow up care. I request legal costs, filing fees and a nominal

amount for pain and suffering caused by my inability to stand or sit over a few minutes at a time, I can only sleep on my back, I can't go to events because I can't stand and I can't do basic things such as lift or carry items. Any payment must be free of the sister state judgment, lien, levy as are all PI payments. The check must be made on a bank with a branch in California. Your client stated she had slip and fall insurance so they should be happy to pay this amount instead of a much larger fee at trial. Below are the fees and requested payment.

Dr Marinaro: Three appts at \$50 = \$150

Tower Imaging: MRI \$550

Dr. Samuel Berkman: Two appts at \$250 = \$500

Dr. Oshiro: Two appts at \$150 co-pay with old insurance, two free appointments, two appointments I did not pay which are in collections, \$180, \$120 = \$600

Ho Physical Therapy: \$150, \$100, \$100 = \$350

Prescriptions: \$350

Total Medical Expenses to date \$2,000

Multiple Process Server fees because your clients tried to evade service: \$1,000

I agreed to accept service without a process server to save you the money and hassle yet you and your clients did not

Total filing fees of original case: \$500

Total Legal fees to date \$1,500

Pain, suffering: \$10,000

Total: \$13,500 free of any sister state judgment, lien, levy.

My original offer which I made through Mr Sullivan was less because it was six months to a year ago. Please, send me your settlement offer in a reply to my offer. Please, relay any questions through Daniel Sullivan. I will not speak with you, Mr Turner.

P.S. I send faxes through email. eFileTexas.gov filings are tracked by eFileTexas.gov via email. Everything goes through email, Mr Turner. Your paranoid refusal to read email for fear that someone will track you makes no sense. All emails, faxes and filings are tracked.

Sincerely,



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RE: June 18, 2015 faxes

I just received two faxes from you today. You acknowledged receipt of my June 17, 2015 letter which was my settlement offer which I faxed to you yesterday. That means you read my settlement offer and didn't make a counter offer thereby refusing my offer. That means there is no reason for a settlement conference as you are not interested in settling.

I said I refuse to personally meet with you, Mr Turner because of your disgusting behavior of leering at me inappropriately, harassing and threatening me. I said I would meet with Daniel Sullivan who is the co-attorney on this case. I am willing to have a settlement conference on the phone or via letter, fax right now.

The court did not order me twice to meet with you for a settlement conference. This is the first time.

Do not set a date or time for a settlement conference. I can't physically make it because of my back. I told you yesterday as soon as my doctor is back in town and gives me a letter I will file motion to reconsider my motion for stay. I also can't make a deposition appointment at this time for the same reason.

You don't have to be mean and unethical in order to win a lawsuit. I read what you did to the woman in the Katrina dog lawsuit. You defied the Judge's court order and helped your client steal a dog. You intentionally papered the poor woman until she couldn't afford to reply just so you could win. You are truly an evil person.

Sincerely,

A handwritten signature in cursive script that reads "Mary Cummins". The signature is written in black ink and is positioned above the printed name.

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Sincerely,

A handwritten signature in cursive script that reads "Mary Cummins".

Mary Cummins

Mary Cummins, Cyber-Stalker // Exposing a Malicious Cyber-Monster

Mary Cummins, Communicable Diseases, Mental Illness

Posted on December 5, 2014 by exposemarycummins

Mary Cummins, Animal Advocates, Real Estate Appraiser, Communicable diseases, Mental Illness
(<http://www.randyturner.com/index.php/randys-cyber-stalker>)

"I understand that this information authorized for release may include information concerning communicable diseases such as hepatitis, syphilis, gonorrhea, drugs, HIV, AIDS, mental illness (except for psychotherapy notes), chemical or alcohol dependency, laboratory test results, medical history, treatment, or any other such related information."

The above excerpt has been captured from a medical release form Mary Cummins was to sign for the alleged injuries she claims to have sustained when she was at the famous Bat World Sanctuary in June of 2010. It is a standard release form everyone signs when they are suing someone for a 'personal injury'.

Remember Mary Cummins alleged slip and fall and her ridiculous, "Ow, I bumped my head and there's guano in my mouth" claim? But there is a turn of events. Mary Cummins REFUSES to sign the form as printed.

Here is what Mary Cummins has done to the form. (<http://marycumminsmarycummins.files.wordpress.com/2014/12/subpoena-medical-release-altered-exh-a-11-17-14.pdf>)

Every reference to communicable diseases, venereal disease, gynecological records was crossed out by Mary Cummins! Why? Why would

anyone who is legitimately injured REFUSE to sign a medical release for their records and ONLY scratch out the references to syphilis, gonorrhea, drugs, HIV, AIDS, mental illness and drugs or alcohol dependency? Uh-huh, I know what you are thinking because I am thinking it as well. If you have never had syphilis, gonorrhea, drug dependencies or mental illness you have nothing to hide; nothing at all, you sign it. It all becomes increasingly clear why Mary Cummins recently announced to the courts, "My vagina is uninjured." Her vagina may be uninjured (<http://mary-cummins.co/2014/11/19/mary-cummins-states-her-vagina-is-uninjured/>) but hardly clean (<https://www.blogger.com/null>) according to her apparent latest attempt to conceal communicable diseases and mental illness.

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LIMITED MEDICAL AUTHORIZATION

PATIENT'S NAME: Mary Cummins
 PATIENT'S DOB: [redacted] must not be exactly
 TO BE RELEASED TO: Dr. Eric Schmidt, Dr. Robert Thomas, Marcello
 You are hereby authorized and requested to permit the examination of, and releasing or reproduction, in any manner, written
 medical, photographic, or otherwise by:

All medical records accessible that are reasonably related to the injuries or damages I incurred in an accident or incident on 05/12/2010
 and in any pre-existing condition of or injury to the part of my body that was injured or damaged on that date.

This authorization is strictly limited to written records and XRS reasonably related to the injuries or damages I incurred in an
 accident or incident on 05/12/2010 and any pre-existing condition of or injury to the part of my body that was injured or
 damaged on that date. This authorization does not include releasing my condition with any person unless my attorney has
 been in contact.

I understand the information authorized for release may include information concerning communicable diseases such as hepatitis,
 syphilis, gonorrhea, drugs, Human Immunodeficiency Virus (HIV) and Acquired Immune Deficiency Syndrome (AIDS), mental
 health (except the psychotherapy notes, absence of patient reporting, diagnosis, test results, medical history, treatment or any
 other such related information related to any injury only), diagnosis, diagnosis of other

The medical and/or pharmaceutical records are limited to use in the investigation and possible trial of a civil lawsuit that has been or
 may be filed on behalf of the patient.

I understand that if the recipient authorized to receive the information is not a covered entity, e.g. justice system or non-health
 care provider the information may be further protected by federal and state privacy regulations or may be subject to the
 confidentiality of the recipient. I understand that I am not releasing any information to the recipient.

I understand that this authorization is voluntary, that I have the right to request the health information to be released and that I may
 refuse to sign this authorization. I further understand that unless the purpose of this authorization is to determine payment of a claim
 for benefits under an insurance or a health plan, the health care and the person of my health care will not be affiliated as whether I
 provide authorization for the request on or children. I was forced to sign this.

I release the entities listed above, their agents and employees from any liability in connection with the use or disclosure of the
 personal health information covered by this authorization. The entity authorized to disclose the information will not be compensated
 by the recipient for the disclosure, except for the cost of copying authorized as authorized by law.

I understand that this authorization will expire ON THE TWENTY SEVENTH (27th) DAY FROM THE DATE OF MY SIGNATURE UNLESS I provide
 the authorization prior to that date. I understand that I may revoke this authorization at any time by notifying
 the recipient in writing. I also understand that the written information must be signed and dated with a
 date that is later than the date on this authorization. The provision will not affect any actions taken before the date of the written
 revocation. I understand that the revocation is not effective to the extent that the provider has relied on this authorization in its actions.
 Also, a revocation is not effective if this authorization was obtained as a condition of obtaining insurance coverage, or other law
 provides the issuer with the right to require a child under the policy limit.

10-2-14
 Date
 Mary Cummins
 Name of Patient or Legally Authorized Representative (PRINT)

Relationship: Name of Patient or Legally Authorized Representative (PRINT)

All financial records, bank accounts, credit card
 SSN, driver's license #'s must be redacted

EXHIBIT A

(http://marycumminsdotco.files.wordpress.com/2014/12/5f115-mary2bcummins2bsubpoena2bmedical2brelease_altered2bexh2ba2b11_17_14.jpg)

Click to enlarge the form

Boy, this is a whole new can of worms. We already know Mary Cummins is under the care of a psychologist (<http://marycumminss.files.wordpress.com/2013/05/12-30-2010-mary-cummins-v-eric-schmidt-of-google.pdf>) but what other mental health professional (who hopefully is prescribing medication) is she seeing? We know Mary Cummins has lived a loose and free lifestyle ever since she confirmed in a courtroom hearing, *"My trips were paid for by all different men."*

After we all regain our composure from seeing what Mary Cummins does not want revealed about her sexual organs and exchange of bodily fluids (<http://marycummins-crass-act.blogspot.com/>), we do have the opportunity (yet again) to have a good laugh. Did you read where she stated, *"I was forced to sign this"*? Who the hell would EVER hire this woman to do anything associated with their family, animals or their real estate? She is a functioning moron. Are the courts putting guns to individual's heads to sign documents? Mary Cummins is too stupid to be using up oxygen that could be put to better use. In what universe does someone bring a lawsuit against someone else for a supposed 'personal injury' and then not produce all their medical records to prove their claim???? Anyone I know who has ever been truly injured jumps to sign the release so they

can prove their injuries. How can Mary Cummins always be so comfortable stating, *"I was forced"* or *"I was ordered to..."*? Did no one ever tell her those are the excuses of a spoiled child not an adult? It just proves even more how stupid she is and if she is that

stupid who in their right mind would hire her to do an appraisal of their property? Mary Cummins clearly has too much time on her hands begging for donations through her not-so-non-profit Animal Advocates so she can pay her OWN wine, grocery and auto bills. She needs to put on her big girl pants and act accordingly.



<http://marycumminsdotco.files.wordpress.com/2014/12/fa3a8->

[mary2bcummins2bfaytty2bfatty2bfatty2bfatso2.jpg](http://marycumminsdotco.files.wordpress.com/2014/12/fa3a8-mary2bcummins2bfaytty2bfatty2bfatty2bfatso2.jpg)

Well, in closing, followers of the dark, dank world of Mary Cummins we can rest assured that Mary Cummins has certainly earned her "Junior Mensa" status (<http://aboutmarycummins.blogspot.com/2013/12/junior-densa.html>).....she is a mentally non-existent entity, a legend in her own mind just like "Junior Mensa" which never existed at all – ever. Imagine your claim to fame being something that never was. LOL.

ALSO SEE:

Mary Cummins Animal Cruelty (<http://marycumminss.wordpress.com/2013/11/26/indybay-linked-to-cyber-stalker-mary-cummins/Mary%20Cummins%20Animal%20Cruelty%20-%20Indybay>)

(<http://www.indybay.org/newsitems/2013/05/20/18737124.php>)Mary Cummins stalks Attorney Randy Turner

(<http://www.randyturner.com/index.php/randys-cyber-stalker>)

<http://www.randyturner.com/index.php/randys-cyber-stalker>) Mary Cummins Exposed (<http://www.marycummins-exposed.com/>)

<http://www.marycummins-exposed.com/>) Mary Cummins makes Death Threats (<http://marycummins-branchcumminians.blogspot.com/>)

<http://marycummins-branchcumminians.blogspot.com/>) Mary Cummins stalks Bat World Sanctuary (<http://batworld.org/batworld-stalker-mary-cummins/>)

Mary Cummins stalks Amanda Lollar (<http://amandalollar.com/>)

<http://amandalollar.com/>) Mary Cummins, Animal Advocates (<http://marycumminsmarycummins.com/>)

Mary Cummins, Cyber-Monster (<http://mary-cummins.co/>)

And lastly, a plug for my favorite charity-



<http://batworld.org/>)

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My medical release is still online

1 message

Mary Cummins <mmmarycummins@gmail.com>
To: Dan Sullivan <dsullivan@galyen.com>

Fri, Apr 10, 2015 at 4:17 PM

You said she would remove it. That is a medical record. She also posted "aids, syphilis...." I don't have a STD of any kind.

<http://marycummins-cyberstalker.com/>

I don't have an inheritance, trust account, any bank account anywhere.

Now she's harassing and defaming attorneys Walter Moore, David Casselman, Paul Alan Levy, Dr's with the USDA, veterinarians...



Mary Cummins
Cummins Real Estate Appraisals
<http://www.MaryCummins.com>
(310) 877-4770
30 years experience
Se habla Espanol!
[Resume](#)

CAUSE NO. 352-248169-10


BAT WORLD SANCTUARY and	§	IN THE DISTRICT COURT
AMANDA LOLLAR	§	
Plaintiffs,	§	
	§	
v.	§	352ND JUDICIAL DISTRICT
	§	
MARY CUMMINS,	§	
Defendant	§	TARRANT COUNTY, TEXAS

ORDER

On May 13 and 20, 2015, *pro se* Defendant Mary Cummins attempted to communicate with the Judge of this Court via email without copying or contacting counsel for Plaintiffs Bat World Sanctuary and Amanda Lollar. Defendant is strongly admonished that such *ex parte* communications are wholly improper and will not be tolerated. Further, although Defendant is proceeding *pro se*, she is advised that even *pro se* parties are required to abide by the Texas Rules of Civil Procedure, the Local Rules of Tarrant County, and the proper standards of conduct in the 352nd District Court. *See, e.g., Boswell v. Honorable Governor of Texas*, 138 F. Supp. 2d 782 (N.D. Tex. 2000) (Mahon, J.) (“Even *pro se* litigants . . . must abide by the . . . Rules of Civil Procedure.”). A parties’ failure to abide by these rules and standards of behavior may result in sanctions being imposed by the Court.

Accordingly, it is hereby **ORDERED** that the improper emails the Court received from Defendant on May 13 and May 20, 2015 are attached hereto and are to be made part of the record.

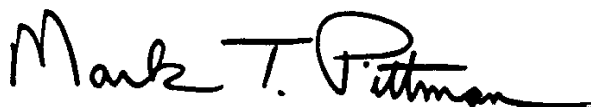
It is further **ORDERED** that Defendant immediately cease all communications with the Judge of this Court without the presence and/or consent of counsel for Plaintiffs.

 E-MAILED
5.20.15 *ov*

It is further **ORDERED** that all future communications with the Judge of this Court shall be conducted either in hearings with all parties and or their representatives physically present and attending in person or in written documents appropriately filed as a part of the Court's record.

It is further **ORDERED** that all the parties shall copy the opposing party on all future written communications with the Court and all future written communications by the parties shall be filed by the Clerk of the Court and become part of the Court's record.

Signed this 26th day of May, 2015.

A handwritten signature in black ink that reads "Mark T. Pittman". The signature is written in a cursive style with a large, looped initial "M".

MARK T. PITTMAN
JUDGE PRESIDING