

Cause No. 20015-002259-2

<p>AMANDA LOLLAR, Plaintiff, vs. MARY CUMMINS, Defendant Pro se</p>	<p>IN THE COUNTY COURT OF LAW NUMBER 2 TARRANT COUNTY, TEXAS</p>
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**MOTION TO DISMISS PLAINTIFF'S PETITION PURSUANT TO THE TEXAS
CITIZENS PARTICIPATION ACT, DEFAMATION MITIGATION ACT**

TO THE HONORABLE JENNIFER RYMELL
COUNTY COURT AT LAW NO. 2 JUDGE:

Pursuant to Sections 27.003(a) and 73.051 of the Texas Civil Practice and Remedies Code, Defendant Pro Se Mary Cummins ("Cummins"), files this Motion to Dismiss Plaintiff's Petition and requests that the Court dismiss all claims in Plaintiff's Petition with prejudice, as fully explained in her Brief in Support of Motion to Dismiss. Pursuant to Section 27.004 of the Texas Civil Practice and Remedies Code, Cummins requests that the Court set a hearing on the Motion to Dismiss Plaintiff's Petition. As Cummins is a disabled indigent out of state pro se Defendant Cummins requests to appear by phone. Cummins further reserves the right to make a later motion for her costs, fees, and other expenses incurred in defending against Plaintiff's Petition pursuant to Section 27.009 of the Texas Civil Practice and Remedies Code.


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1 Respectfully submitted,
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4 Mary Cummins, Defendant Pro se
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9 Date July 21, 2015

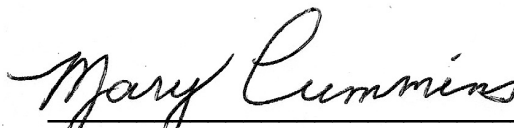
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By: 
Mary Cummins, Defendant Pro Se

CERTIFICATE OF SERVICE

I, Mary Cummins, hereby certify that a TRUE COPY of the above **DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S PETITION PURSUANT TO THE TEXAS CITIZENS PARTICIPATION ACT, DEFAMATION MITIGATION ACT** was served on the Plaintiffs' Attorney of record by FAX and by FIRST CLASS MAIL on July 21, 2015 at

Randy Turner
Bailey & Galyen
1300 Summit Ave Suite 650
Fort Worth, Texas 76102
May 22, 2015



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