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IN THE SECOND DISTRICT COURT OF APPEALS

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MARY CUMMINS  
v.  
AMANDA LOLLAR

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**APPELLEE’S MOTION TO PROHIBIT APPELLANT, MARY CUMMINS, FROM  
REPEATEDLY ADDING ATTORNEY’S WIFE AS A SERVICE CONTACT**

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To The Honorable Court of Appeals:

Appellee, Amanda Lollar, brings this Motion to Prohibit Appellant, Mary Cummins, from Repeatedly Adding Attorney’s Wife as an E-file Service Contact in this case and in support of this motion shows the following:

I.

In the latest among countless vindictive efforts to harass Appellee and her attorney, Appellant added the wife of Appellee’s attorney as a “service contact” to receive copies of all documents filed in this case. Appellee’s attorney’s wife has no connection with this case other than being married to Appellee’s attorney and does not want to receive copies of documents filed in this case at her work email address or at her personal email address. Appellee’s wife asked efile.gov to remove her as a service contact. She was promptly removed but was told that there is “no way to prevent you from being repeatedly re-added” by Mary Cummins, which will require her to request removal each time Cummins adds her as a service contact. On August 17, 2016, after efile.gov removed her as a service contact, Appellant once again added her as a service contact so she would receive Appellant’s latest letter to the Court, forcing Appellee’s

attorney's wife to again request removal.

II.

Appellant's sole purpose in repeatedly adding Appellee's attorney's wife as a service contact is to harass and annoy. There is no legitimate purpose for Appellee's attorney's wife to be a service contact in this case and to receive emails about this case at her place of employment or at her personal email address against her will. If she were not an attorney herself she could simply block emails from the e-filing system but since she is an attorney and uses the e-filing system in her own law practice she cannot do so. Unfortunately, there is no remedy other than for Appellee to ask this Court to order Cummins to cease adding Appellee's attorney's wife as a service contact.

**WHEREFORE**, Appellee moves the Court to order Appellant, Mary Cummins, to immediately cease adding Appellee's attorney's wife, Patti Gearhart Turner, as a service contact.

Respectfully submitted,

/S/ Randall E. Turner  
RANDALL E. TURNER  
State Bar No. 20328310  
Law Offices of Randall E. Turner, PLLC  
4255 Bryant Irvin Rd., Suite 210  
Fort Worth, Texas 76109  
Tel. 817-420-9690  
Fax 817-887-5717  
Email: [randy@randyturner.com](mailto:randy@randyturner.com)  
Attorney for Appellee

**CERTIFICATE OF SERVICE**

A true and correct copy of the above and foregoing Motion to Prohibit Mary Cummins from Repeatedly Adding Attorney's Wife as an Efile Service Contact was served upon Appellant in accordance with the Texas Rules of Appellate Procedure this 17<sup>th</sup> day of August, 2016.

/S/ Randall E. Turner  
RANDALL E. TURNER