

MARY CUMMINS

Defendant

645 W. 9th St. #110-140

Los Angeles, CA 90015

In Pro Per

Telephone: (310) 877-4770

Email: mmmaryinla@aol.com

FAX FILED

FILED
Superior Court of California
County of Los Angeles

AUG 26 2016

Sherri R. Carter, Executive Officer/Clerk
By Ricardo Perez Deputy
Ricardo Perez

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

BAT WORLD SANCTUARY,

AMANDA LOLLAR

Plaintiff

v.

MARY CUMMINS

Defendant

Case No. BS140207

ADDITIONAL REPLY: AMENDED
MOTION TO QUASH, MODIFY
SUBPOENA, PROTECTIVE ORDER
CCP 1987.1; Subpoenas

Date: August 26, 2016

Time: 8:30 a.m.

Room: Dept 24

Judge: Honorable Robert Hess

Reservation # 160713142795

**ADDITIONAL REPLY TO PLAINTIFF'S REPLY TO MOTION TO
QUASH**

Defendant Mary Cummins, (hereinafter "Defendant") filed Motion to Quash subpoenas. Plaintiff replied and Defendant replied to Plaintiff's response. Judge Hess took the matter under submission today. Defendant asks that this important and relevant additional information be considered before Judge Hess rules on the motion.

Defendant did meet and confer with Plaintiff's attorney June 23, 2016 the day Defendant received the subpoenas, Exhibit 1. Defendant was flustered today by the false allegations and was not able to properly communicate this to the Judge.

ADDITIONAL REPLY TO PLAINTIFF'S REPLY TO MOTION TO QUASH 1

08/29/2016

1 In that same email Defendant told attorney Hunt that Hunt cannot use the stolen
2 records of Animal Advocates or any PayPal records. Hunt knew they were stolen
3 before Hunt filed them. None of those stolen records were ever authenticated. No one
4 from the banks or PayPal were at the hearing to authenticate them. They've also been
5 highly edited. They cannot be used for these reasons.

6 Pro se Defendant replied to Plaintiff's reply within an hour of receiving the June
7 subpoenas. Defendant did not address every issue in the reply or today at the hearing
8 for this reason.

9 Defendant has never taken a penny from Animal Advocates. Defendant used to be
10 the main donor starting in 2002. Defendant paid Animal Advocates' bills until
11 Defendant was unable to do so. No proof was submitted today that Defendant took
12 anything from Animal Advocates. Plaintiff also posted the same checks twice to make
13 it appear to be more. Any check made was only for the benefit of Animal Advocates be
14 in their rent or money for animal feed, cash to buy caging off craigslist, permits...

15 Defendant also hereby asks this court and Plaintiff to serve Defendant via email.
16 This was requested from Plaintiff's attorney April 29, 2016, Exhibit 2. Plaintiff is
17 served by email in this case. There is no need to waste paper, postage, gas, driving
18 when most courts are digital today except this one. Defendant is indigent in this case.

19 Attached is complaint Defendant made against Plaintiff's attorney Ashley Marie
20 Hunt Conlogue today to the California Bar Association for violating the rules of
21 court, using stolen documents, lying in filed documents and at the hearings, Exhibit 3.

22 Also attached is proof that Defendant is disabled. Defendant's doctor wrote a letter
23 to the DMV stating Defendant is disabled. That disabled identification card redacted is
24 attached, Exhibit 4. Defendant can walk 15 feet and grab a suicidal woman's arm.
25 Defendant can't sit over 20 minutes at a time, can't stand over three minutes at a time
26 and can only sleep on Defendant's back because of a severe back injury. Defendant is
27 awaiting surgery.
28

If the court denies Defendant's motion to quash subpoena, request for protective order, to strike Plaintiff's August 12, 2016 filing, this letter is notice to all parties that Defendant will file motion to rehear and appeal. Per the law and case precedent the Party must lose any hearing where they try to use stolen, unauthorized, unauthenticated documents with unclean hands and violate California Court Rule 1.20 by filing Social Security Numbers and financial information.

Respectfully submitted,



Mary Cummins, Defendant

Dated: August 26, 2016

08/29/2016

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE
(FRCivP 5 (b)) or
(CCP 1013a, 2015.5) or
(FRAP 25 (d))

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

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

ADDITIONAL REPLY TO PLAINTIFF'S REPLY TO MOTION TO QUASH

on the following interested parties by emailing, faxing this document to the following and JP Morgan Chase Bank, Allgate Financial, American California Bank, American Cal Financial Services, Tinker Federal Credit Union and Wells Fargo Bank.

Christian Molner
Ashley Hunt
12400 Wilshire #1180
Los Angeles, CA 90025

Gallagher Group
1337 Howe Ave #104
Sacramento, CA 95825

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

Executed this day, August 26, 2016, at Los Angeles, California.

Respectfully submitted,

Mary Cummins

Mary Cummins, Plaintiff
Dated: August 26, 2016



Mary Cummins <mmmarycummins@gmail.com>

BS140207 case subpoenas

1 message

Mary Cummins <mmmarycummins@gmail.com>

Thu, Jun 23, 2016 at 4:40 PM

To: christian@christiansmolnarlaw.com, ashley.hunt@alumni.lis.edu, cmolnar@arendsencane.com, Hamilton Arendsen <HARENDSSEN@arendsencane.com>, JCANE@arendsencane.com

Christian, Ashley,

You are again committing motion abuse and fraud. Animal Advocates was not a party to the case. You can't subpoena them for records. Judge Robert Hess already ruled you are not allowed to get Animal Advocates' records. I'm filing motion to quash them all in the morning along with motion for perjury and sanctions. You told the judge you had proof I changed my name and SSN. No, you don't. I didn't change my name and SSN. You flat out lied.

You also can't use any information illegally obtained when the Texas lawyer stole Animal Advocates' bank statements. You can't use any information illegally obtained when the Texas lawyer stole the PayPal statements. He was ordered by the bank and PayPal to return the stolen documents. I filed a police report in regard to my records. If you are using data from the stolen records, you are also guilty.

I will again file motion to quash all these subpoenas. I have never even heard of these other parties you are subpoenaing. They are not in my bank statements. This is just more harassment.

You are only entitled to bank statements. I have never had a bank account at JP Morgan Chase in my entire life.

The Texas attorney had a now void bank statement release. If he thought I had an account there, he would have sent them a request January 2016. That authorization is now void because the Texas attorney abused it.

You were supposed to give me a copy of everything you got from the banks. I have received nothing. Please, send me what you received. Your behavior in court and with these subpoenas is way out of line.



Mary Cummins

08/29/2016



Mary Cummins <mmmarycummins@gmail.com>

Case BS140207 - Please, notice, serve me documents digitally

1 message

Mary Cummins <mmmarycummins@gmail.com>

Fri, Apr 29, 2016 at 5:54 PM

To: christian@christiansmolnarlaw.com, ashley.hunt@alumni.ils.edu

I can't afford to buy the documents online. I told you to serve me via email. I don't have a car. I can't drive to the p.o. box. I am legally physically disabled.

Plaintiffs have all of the bank records already. The TX court stated they are only allowed to have my bank records and not the records of Animal Advocates. I am not Animal Advocates. My name is not on that account. Neither is my SSN. I haven't had a bank account since 2013. Judge Hess knows this personally. As you can see from the publicly filed 990's, Animal Advocates is also penniless with no assets.

The upcoming hearing is not necessary. I know you're just doing this to get a nice bill from Amanda Lollar. I don't care about that but you are wasting the court's time and mine.

I will file a complaint against your license. I told you your client committed forgery, fraud and perjury in this case. You are knowingly representing this forgery, fraud and perjury to the Judge and court.

I am filing an amended motion to quash. You are on notice. I will email it to you. Please, email me your motion now so I don't have to amend mine again.



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

08/29/2016

Mary Cummins
645 W 9th St #110-140
Los Angeles, CA 90015
Direct: (310) 877-4770
Fax: (310) 494-9395
mmmaryinla@aol.com
www.MaryCummins.com

August 26, 2016

Via email, fax and USPS
State Bar of California
Arendsen Cane Molnar LLP
Ashley Marie Hunt Conlogue
Judge Robert Hess Dept 24

RE: Complaint against attorney Ashley Marie Hunt Conlogue State Bar 285277 Case BS140207

August 12, 2016 attorney Ashley Marie Hunt Conlogue publicly filed the below document with the LA County Superior Court.

8/12/2016 12:00:00 AM - OPPOSITION OF PLAINTIFF AMANDA LOLLAR TO MOTION TO QUASH, MODIFY SUBPOENA, PROTECTIVE ORDER OF DEFENDANT MARY CUMMINS; REQUEST FOR SANCTIONS AGAINST DEFENDANT MARY CUMMINS IN THE SUM OF \$2,988.00, 1-133 pages.

This document was not filed under seal. It's in violation of protective orders in Texas and California. It contained the social security number of Defendant Mary Cummins, checks with full routing number, bank account numbers, signatures, names... The document also included stolen bank records and PayPal records. Attorney Ashley Hunt knew this when she filed it per email sent June 23, 2016 (Exhibit 1).

An email was sent to Ashley Hunt and Christian Molnar who is also an attorney in this case telling them they publicly filed a document with data which is not allowed per California Rule of Court 1.20, contains stolen documents... (Exhibit 2).

A letter was sent to the clerk and court advising them that the document contained forbidden data asking them to strike and destroy the document (Exhibit 3).

A reply was filed to Plaintiff's August 12, 2016 motion on August 24, 2016 (Exhibit 4) stating the documents were not redacted or filed under seal. Defendant also advised the attorney again that the Animal Advocates bank statements and all PayPal records were stolen. No one signed an authorization for Animal Advocates records. The Texas judge clearly stated that Plaintiff was not allowed to have the records of Animal Advocates. The authorization which Defendant did sign did not include any PayPal records. Plaintiff's Texas attorney forged an authorization and sent the forged authorization to the bank and PayPal to illegally receive those records. The PayPal data which was included was highly edited and put into an Excel chart.

At the August 26, 2016 hearing attorney Ashely Hunt also committed perjury by lying to the court. Hunt stated she did not receive the email service of Defendant's August 24, 2016 reply. That is a lie. Hunt

received and opened it 46 seconds after it was sent (Exhibit 5). Defendant sent it to the email address which was listed as the contact email for Hunt in the State Bar of California directory.

In court Judge Robert Hess formally stated that attorney Hunt was clearly in the wrong for publicly filing unredacted documents with social security numbers, bank account numbers, signatures Judge Hess stated that Hunt's action was sanctionable. Judge Hess has not yet signed an order. The hearing was recorded. A transcript can be made if necessary.

In a previous hearing on May 10, 2016 attorney Hunt again committed perjury and defamed Defendant. Hunt stated that Defendant has a new name and social security number. Hunt stated she has proof. There was no proof. Defendant has never changed her name or social security number. Hunt was trying to smear the reputation of Defendant to the Judge.

I am asking that Ashely Hunt lose her license for intentionally filing confidential documents against California Rule of Court Rule 1.20, filing stolen documents and lying in court documents and at hearings. Attached is the formal complaint form and Exhibits. This complaint is privileged and public as it is being added to case BS140207, sent to the Court and State Bar of California. If you have any questions, feel free to give me a call.

Sincerely,



Mary Cummins

Attached: Complaint, Exhibits

08/29/2016

THE STATE BAR OF CALIFORNIA CALIFORNIA ATTORNEY COMPLAINT FORM

Read instructions before filling in this form.

Please mail to: Office of Chief Trial Counsel / Intake Dept., State Bar of California
845 South Figueroa Street, Los Angeles, California 90017-2515

(1) Your contact information:

Your name: Mary Cummins

Your address: 645 W 9th St #110-140

Your city, state & zip code: Los Angeles, CA 90015

Your email address: Mary@MaryCummins.com

Your telephone numbers:

Home (310) 877-4770 Work _____ Cell _____

(2) Attorney's contact information: Please provide the name, address and telephone number of the attorney(s) you are complaining about. (NOTE: If you are complaining about more than one attorney, please use a separate form or include on a separate sheet for each attorney the information requested in items #2 through #7.)

Attorney's name: Ashley Marie Hunt Conlogue

Attorney's address: 12400 Wilshire Blvd Ste 1180

Attorney's city, state & zip code: Los Angeles, CA 90025

Attorney's telephone number: (310) 820-9900

Attorney's California bar license number: 292083

(3) Have you or a member of your family complained to the State Bar about this attorney previously?

Yes ☐ No ☒

(4) Did you employ the attorney? Yes ☐ No ☒

If "Yes," give the approximate date you employed the attorney and the amount, if any, paid to the attorney.

Date employed: _____ Amount paid (if any): \$ _____

If "No," what is your connection with the attorney(s)? Explain briefly.

Attorney represents plaintiff in this case.

08/29/2016

(5) Include with this form (on a separate piece of paper) a statement of what the attorney(s) did or did not do that is the basis of your complaint. Please state the facts as you understand them. Do not include opinions or arguments. If you employed the attorney(s), state what you employed the attorney(s) to do. Sign and date each separate piece of paper. Additional information may be requested. (Attach copies of pertinent documents such as a copy of the fee agreement, cancelled checks or receipts, and relevant correspondence.)

(6) If your complaint is about a lawsuit, answer the following, if known:

a. Name of court (For example, Superior Court and name of the county)

Los Angeles County Superior Court, Stanley Mosk Courthouse, 90012

b. Title of the suit (For example, Smith v. Jones)

Amanda Lollar, Bat World Sanctuary v Mary Cummins

c. Case number of the suit BS140207

d. Approximate date the suit was filed 11/20/2002

e. If you are not a party to this suit, what is your connection with it? Explain briefly.

(7) Size of law firm complained about:

- ☐ 1 Attorney
☐ 2 - 10 Attorneys
☒ X--1 + Attorneys
☐ Government Attorney
☐ Unknown

(8) Translation Information:

If you require that the State Bar utilize formal translation services in order to process your complaint, it may delay our communications with you. Is someone available to provide translation assistance for you so that the State Bar may communicate with you in English?

Yes ☐

No ☐

If "no," state the language in which you need formal translation:

Signature

Mary Cummins

Date: 08/26/2016

08/29/2016



Mary Cummins <mmmarycummins@gmail.com>

BS140207 case subpoenas

1 message

Mary Cummins <mmmarycummins@gmail.com>

Thu, Jun 23, 2016 at 4:40 PM

To: christian@christiansmolnarlaw.com, ashley.hunt@alumni.ils.edu, cmolnar@arendsencane.com, Hamilton Arendsen <HARENSEN@arendsencane.com>, JCANE@arendsencane.com

Christian, Ashley,

You are again committing motion abuse and fraud. Animal Advocates was not a party to the case. You can't subpoena them for records. Judge Robert Hess already ruled you are not allowed to get Animal Advocates' records. I'm filing motion to quash them all in the morning along with motion for perjury and sanctions. You told the judge you had proof I changed my name and SSN. No, you don't. I didn't change my name and SSN. You flat out lied.

You also can't use any information illegally obtained when the Texas lawyer stole Animal Advocates' bank statements. You can't use any information illegally obtained when the Texas lawyer stole the PayPal statements. He was ordered by the bank and PayPal to return the stolen documents. I filed a police report in regard to my records. If you are using data from the stolen records, you are also guilty.

I will again file motion to quash all these subpoenas. I have never even heard of these other parties you are subpoenaing. They are not in my bank statements. This is just more harassment.

You are only entitled to bank statements. I have never had a bank account at JP Morgan Chase in my entire life.

The Texas attorney had a now void bank statement release. If he thought I had an account there, he would have sent them a request January 2016. That authorization is now void because the Texas attorney abused it.

You were supposed to give me a copy of everything you got from the banks. I have received nothing. Please, send me what you received. Your behavior in court and with these subpoenas is way out of line.



Mary Cummins

08/29/2016



Mary Cummins <mmmarycummins@gmail.com>

CONTEMPT OF COURT ORDER BS140207

1 message

Mary Cummins <mmmarycummins@gmail.com>
To: christian@christiansmolnarlaw.com

Wed, Aug 24, 2016 at 12:36 PM

I just received your reply to my motion to quash. It contains the stolen bank records of Animal Advocates! You didn't even file it under seal. They were stolen with a forged court order. A police report was filed. The Judge stated they could not be used, were not obtained legally and the bank should have never given them to Tumer.

I don't care if your client didn't give you the transcript and lied to you. You are still responsible for being in possession of stolen documents and illegally using them. The bank demanded the records back twice. ALL records are also under a protective order. They were never allowed to be included in a legal filing. There were two protective orders. The PayPal records were obtained with a forged court order. I never signed a release for "financial institutions." The authorization did not say any account of which I was a signature. I will demand that you are sanctioned for contempt of the court order. I'm also filing a complaint against your license.



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

Sent with MailTrack

08/29/2016



Mary Cummins <mmmarycummins@gmail.com>

VIOLATION OF REDACTION RULE

1 message

Mary Cummins <mmmarycummins@gmail.com>
To: christian@christiansmolnarlaw.com

Wed, Aug 24, 2016 at 1:23 PM

You included my social security number, my financial information, financial information of Animal Advocates and of hundreds of other people. I will demand that you be sanctioned and go to jail. You were notified many times by me not to include my SSN or any financial information. The items you included were stolen financial documents. Plaintiff was not allowed to have any PayPal records of anyone. The transcript and order I'm looking at clearly states Animal Advocates documents are not to be included in any discovery.

Notice and Warning
Sanctions for Including Social Security and Financial Account Information in Filed Documents

<https://ww2.lacourt.org/efiling/common/PersonalInfoWarningNotice.pdf>



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

08/29/2016

Mary Cummins
645 W 9th St #110-140
Los Angeles, CA 90015
Direct: (310) 877-4770
Fax: (310) 494-9395
mmmaryinla@aol.com
www.MaryCummins.com

August 25, 2016

Per Fax to both
Clerk of the Court
Clerk of Dept 24
Stanley Mosk Courthouse
111 N Hill St
Los Angeles, CA 90012

RE: EMERGENCY! Document filed with Social Security, Bank Account numbers, copies of checks, signatures - Case BS140207 filed August 12, 2016 by Plaintiff

Plaintiff on August 12, 2016 filed a 133 pg document in this case in violation of your redaction rule California Rule of Court 1.20. It's in violation of the warning on the court document page linked below. That document includes my social security number, copies of my financial records, financial records of non-party Animal Advocates, financial records which were stolen, financial records of hundreds of other people. It also includes full copies of checks with signatures, bank account numbers, bank routing numbers, confidential contact information...of hundreds of people. It also includes stolen bank records and stolen PayPal records. The items were stolen. A police report was filed months ago. Plaintiff was ordered to return the stolen documents but clearly refused. The documents are under a protective order in California and Texas and can never be filed in any legal case or made public.

Please, remove and destroy that document immediately. Permanent financial damage will be done if that document remains in the public court document system.

<https://ww2.lacourt.org/efiling/common/PersonalInfoWarningNotice.pdf>

"Notice and Warning, Sanctions for Including Social Security and Financial Account Information in Filed Documents. Effective, January 1, 2007 per California Rule of Court 1.20."

This is the full name of what they filed and when,

8/12/2016 12:00:00 AM - OPPOSITION OF PLAINTIFF AMANDA LOLLAR TO MOTION TO QUASH, MODIFY SUBPOENA, PROTECTIVE ORDER OF DEFENDANT MARY CUMMINS; REQUEST FOR SANCTIONS AGAINST DEFENDANT MARY CUMMINS IN THE SUM OF \$2,988.00, 1-133 pages.

The social security number, check numbers, signatures....are on these pages. The rest of the pages contain the stolen documents. Documents for Animal Advocates or PayPal were stolen. They were never authorized. A police report was filed.

SSN: 41, 44, 47, 50, 53

Checks, financial account information, routing numbers, signatures, bank accounts info of others ...:

60-65, 80

Stolen PayPal documents, not authorized. The format is not PayPal. It's a chart they made with their own comments which are false. 91-105. They state I gave money to take a class with a pole dance teacher. That is completely false besides bizarre.

I fax filed a reply to their filing yesterday asking to strike and destroy the document and for contempt and sanctions against plaintiff. Please, destroy the file now or many people will be permanently financially harmed. Feel free to contact me if you have a question. Thanks.

Sincerely,



Mary Cummins

08/29/2016

MARY CUMMINS

Defendant

645 W. 9th St. #110-140

Los Angeles, CA 90015

In Pro Per

Telephone: (310) 877-4770

Email: mmmaryinla@aol.com

FAX FILE

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

BAT WORLD SANCTUARY,

AMANDA LOLLAR

Plaintiff

v.

MARY CUMMINS

Defendant

) Case No. BS140207

) MOTION TO QUASH, MODIFY
) SUBPOENA, PROTECTIVE ORDER
) CCP 1987.1; Subpoenas

) Date: August 26, 2016

) Time: 8:30 a.m.

) Room: Dept 24

) Judge: Honorable Robert Hess

) Reservation # 160713142795

**REPLY TO PLAINTIFF'S OPPOSITION TO MOTION TO QUASH,
MODIFY SUBPOENA, PROTECTIVE ORDER; REQUEST FOR SANCTIONS**

Defendant Mary Cummins, (hereinafter "Defendant") filed Motion to Quash subpoenas. Defendant just received Plaintiff's Opposition to Motion to Quash, modify subpoena and protective order today August 24, 2016.

Plaintiff included in their reply in violation of California Rule of Court 1.20, redaction rule¹ which was not even under seal the social security number of Defendant, bank records which were stolen and never authorized from Animal Advocates, PayPal

¹Notice and Warning Sanctions for Including Social Security and Financial Account Information in Filed Documents
<https://ww2.lacourt.org/efiling/common/PersonalInfoWarningNotice.pdf>

**REPLY TO PLAINTIFF'S OPPOSITION TO MOTION TO QUASH, MODIFY SUBPOENA,
PROTECTIVE ORDER; REQUEST FOR SANCTIONS 1**

1 records which were stolen and never authorized from Animal Advocates and
2 Defendant, copies of stolen unauthorized checks with bank routing numbers, bank
3 account numbers, signature, confidential, private and financial information of hundreds
4 of other unrelated people.

5 Their reply also includes records which are under a protective order in Texas and
6 California. The Texas order states the records can never be included in a legal filing or
7 publicly shared in any manner (Exhibit 1). This Court ordered Plaintiff not to publicly
8 share any financial records received in discovery. The Texas court also clearly stated
9 that no records of Animal Advocates are to be given to Plaintiff. The California order
10 signed by this Court states the records cannot be shared publicly or with anyone other
11 than lawyers in this case, can only be filed under seal (Exhibit 2). Plaintiff did not file
12 the stolen, unauthorized or legally obtained records under seal.

13 Defendant requests that Plaintiff's reply be stricken and destroyed. Defendant has
14 stated many times in writing to parties that they cannot include Defendant's social
15 security number or financial information in legal filings. It must be redacted as
16 Defendant has done in Defendant's filings. In this case Plaintiff included stolen bank
17 records of Animal Advocates and stolen PayPal records of Animal Advocates and
18 Defendant. Those records include the confidential, financial information of hundreds
19 of other people.

20
21 Defendant requests that Plaintiff Amanda Lollar and her California attorneys who
22 filed this motion Ashley Conlogue and Christian Molnar be sanctioned for their
23 intentional violation of the California Rule of Court 1.20 and for misrepresenting
24 material facts to the court. As Plaintiff clearly has unclean hands the sister-state
25 judgment should be vacated.

26 INTRODUCTION

27 This sister-state judgment comes from a defamation suit in Texas. Defendant never
28 defamed Plaintiff. In the trial court Plaintiffs never even stated what they felt was

defamatory. Plaintiff admitted in trial they had no evidence of any damages or causation by Defendant. Before the trial Plaintiff's attorney Randy Turner stated to Defendant "I've known this judge for many years. He'll sign anything I put in front of him." Judge William Brigham visiting, long retired judge brought in for one hearing and the trial who is now deceased did indeed sign every order without even reading them. A \$6,176,000 judgment was made against Defendant.

Defendant appealed and all claims were reversed except defamation. The Appeals Court ruled that Plaintiff didn't have to state what they felt was defamatory². They ruled "defamation is assumed and doesn't have to be proven." They ruled the defamation was with malice even though malice has a very high threshold of proof. One must prove defamation to prove malice which wasn't done. Appeals court also ruled that Defendant didn't object to the "quality" of the evidence for damages. There was no evidence of any damages submitted. The Texas appeals court panel was made up of personal friends of Plaintiff's attorney Randy Turner. Turner openly brags to Defendant in Texas courtroom hallways that he controls the Judges in Fort Worth, Texas. Turner and his wife have been lawyers in Fort Worth, Texas over 34 years on many boards, committees, groups with these same judges.

I. DEFEDNAT'S MOTION TO QUASH SUBPOENA SHOULD BE GRANTED

- A. Plaintiff has a bank authorization for any bank accounts in the name of Defendant with Defendant's SSN. They received all bank records of Defendant February 2016. Defendant does not have a bank account. There are no more records.
- B. The subpoena is overly broad and vague requesting documents of non-party Animal Advocates and Defendant with no time limit or limit to scope. This Court already made an order on previous subpoenas. Any new subpoenas should comply with that order to parties, dates and scope.

² Mary Cummins v Amanda Lollar Appeal <http://www.search.txcourts.gov/Case.aspx?cn=02-12-00285-CV&coa=coa02>

1 C. Defendant is not managing Animal Advocates. Animal Advocates is a
2 stand alone corporation with its own EIN. Defendant is awaiting back
3 surgery and not personally, actively rehabbing wildlife at the moment.
4 Volunteers care for the animals. Animal Advocates is not fundraising,
5 doing events or any other activity for the moment. There is nothing to
6 manage.

7 D. Defendant used to be the main donor to Animal Advocates back in
8 2002. Defendant used to pay Animal Advocates' bills but can no longer
9 support Animal Advocates.

10 E. The Texas Court specifically stated that Plaintiff is NOT authorized to
11 have or use the records of Animal Advocates. The bank authorization
12 which was signed (redacted SSN only) Exhibit 3 was only for "bank
13 records" in the name of Defendant with Defendant's SSN.

14 Court stated in a hearing April 1, 2016 in the underlying case 352-
15 248169-10 in 141st District Court for post judgment discovery that
16 Plaintiff cannot have the records of Animal Advocates. Exhibit 4,
17 Transcript, pg 13, line 8,

18 "MS. CUMMINS: I never signed an authorization for Animal Advocates.
19 I couldn't if I wanted to. I can't authorize --

20 THE COURT: I think you have an issue with your bank giving him those,
21 and you might want to talk to your bank and ask them why they gave him
22 documents that there wasn't an authorization for."

23 The Court also says Plaintiff cannot use stolen documents which
24 weren't authorized, Exhibit 5, Transcript, pg 10, line 12.

25 MS. CUMMINS: If he did -- if they would have given him the documents
26 accidentally, which they did not, he still could never use them, because
27 they are the records of Animal Advocates.
28

THE COURT: Right. No, I don't disagree with you. I think that the order that we sent, wasn't that marked out in there? There was a sentence in that order that was marked out so that he couldn't get those records, right?

MS. CUMMINS: He was only allowed my records with my name and social security number.

THE COURT: Right. Okay."

The bank sent a letter (redacted) Exhibit 6 to Plaintiff stating they must return the unauthorized records. Plaintiff refused. Plaintiff is in the possession of stolen bank records.

All of the PayPal records were stolen. The "bank authorization" Defendant signed crossed out "financial institution" (redacted) Exhibit 3. It was only for "bank records." PayPal is not a bank. Plaintiff was not allowed ANY records of Animal Advocates. Defendant included the stolen bank and PayPal records in a police report (redacted) made against Texas attorney Randy Turner Exhibit 8.

All records were covered by a protective order in Texas and now in California in this Court. They were not allowed to be shared publicly.

II. PLAINTIFF SHOULD BE SANCTIONED FOR VIOLATING CALIFORNIA COURT RULE 1.20, FILING FRIVOLOUS REPLY, FILING STOLEN FINANCIAL RECORDS AND KNOWINGLY MISREPRESENTING MATERIAL FACTS TO THE COURT. JUDGMENT SHOULD BE VOIDED.

- A. Plaintiff's reply to motion to quash is frivolous and without merit.
- B. Defendant does not have a long history of filing frivolous motions to quash. The last motion to quash, request for protective order this Court granted.
- C. Plaintiff knowingly misrepresented material facts to the Court.

1 Plaintiff stated that the Texas court stated that Plaintiff could have and use
2 the stolen records of Animal Advocates. That is completely and
3 absolutely false. The court specifically stated Plaintiff could not have
4 those stolen records or use them.

5 Plaintiff has unclean hands in this case. The Judgment should be
6 voided. California has long recognized the maxim that "No one can take
7 advantage of his own wrong." *Civ. Code* § 3517. In other words, "[h]e
8 who comes into equity [into court] must come with clean
9 hands." *See, Wilson v. S.L. Rey, Inc.* (1993) 17 Cal.App.4th 234,
10 244; *Kendall-Jackson Winery, Ltd. v. Superior Court* (1999) 76
11 Cal.App.4th 970, 978 (emphasis added). The rationale of the doctrine
12 was explained in *Kendall-Jackson Winery, Ltd. v. Superior Court, supra*,
13 at 978-79:

14 PRAYER

15 Defendant requests that Plaintiff's August 12, 2016 reply to
16 Defendant's Motion to quash be stricken and destroyed. Defendant
17 requests that the sister-state judgment be vacated as Plaintiff has unclean
18 hands. Defendant requests that Plaintiff Lollar and her attorneys Christian
19 Molnar (SBN 177665) and Ashley Hunt Conlogue (SBN 292083) be
20 sanctioned, pay all Defendant's costs for this hearing and pay for five
21 years of credit monitoring for all parties whose information was illegally
22

23 ///

24 ///

25 ///

26 ///

27 ///

28 .

obtained and publicly posted. Defendant requests that Plaintiff's subpoenas be quashed. In the alternative Defendant requests that the subpoenas be limited to only records of Defendant with Defendant's SSN from August 2010 to the present like the past subpoenas this Court ordered.

Respectfully submitted,



Mary Cummins, Defendant

Dated: August 24, 2016

08/29/2016

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE
(FRCivP 5 (b)) or
(CCP 1013a, 2015.5) or
(FRAP 25 (d))

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

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

REPLY TO PLAINTIFF'S OPPOSITION TO MOTION TO QUASH, MODIFY
SUBPOENA, PROTECTIVE ORDER; REQUEST FOR SANCTIONS

on the following interested parties by emailing, faxing this document to the following and JP Morgan Chase Bank, Allgate Financial, American California Bank, American Cal Financial Services, Tinker Federal Credit Union and Wells Fargo Bank.

Christian Molner
Ashley Hunt
12400 Wilshire #1180
Los Angeles, CA 90025

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

Executed this day, August 24, 2016, at Los Angeles, California.

Respectfully submitted,

Mary Cummins

Mary Cummins, Plaintiff

Dated: August 24, 2016

To: Fax File LA Court Page 25 of 43
Oct. 9. 2015 2:37PM

2016-08-26 19:52:41 (GMT)

13104949395 From: mary cummins
No. 5680 P. 2

CAUSE NO. 352-248169-10

**AMANDA LOLLAR, BAT WORLD
SANCTUARY**

Plaintiffs

vs.

**MARY CUMMINS,
Defendant Pro Se**

§ **IN THE DISTRICT COURT**

§

§

§

352ND JUDICIAL DISTRICT

§

§

§

TARRANT COUNTY, TEXAS

PROTECTIVE ORDER

On October 8, 2015, the Court heard the Motion for Protective Order filed by Mary Cummins. Amanda Lollar's attorney appeared by telephone. Mary Cummins appeared by telephone.

IT IS ORDERED that all financial information and documents obtained by the parties in this cause, including bank records, shall not be published or disclosed to any person or otherwise made public to any person who is not a party to this suit, an attorney for a party, or an attorney's staff.

SIGNED this ____ day of _____, 2015.

JUDGE PRESIDING

APPROVED AS TO FORM:

RANDALL TURNER

Mary Cummins

MARY CUMMINS

EXHIBIT 1

08/27/2016

Oct. 9. 2015 2:37PM

No. 5680 P. 2

352-248169-10

CAUSE NO. 352-248169-10

AMANDA LOLLAR, BAT WORLD
SANCTUARY
Plaintiffs

vs.

MARY CUMMINS,
Defendant Pro Se

§ IN THE DISTRICT COURT
§
§
§ 352ND JUDICIAL DISTRICT
§
§
§
§ TARRANT COUNTY, TEXAS

PROTECTIVE ORDER*April 1 2015*

On ~~October 8, 2015~~, the Court heard the Motion for Protective Order filed by Mary Cummins. Amanda Lollar's attorney appeared by telephone. Mary Cummins appeared by telephone.

IT IS ORDERED that all financial information and documents obtained by the parties in this cause, including bank records, shall not be published or disclosed to any person or otherwise made public to any person who is not a party to this suit, an attorney for a party, or an attorney's staff. *or other court. This order does not prevent another court from using the records as they see proper.*

SIGNED this 1 day of April 2015.

[Signature]
JUDGE PRESIDING

APPROVED AS TO FORM:

[Signature]
RANDALL TURNER

[Signature]
MARY CUMMINS

COURT'S MINUTES
TRANSACTION# 57

PROTECTIVE ORDER

E-MAILED

[Signature]
Mary Cummins; Turner

EXHIBIT 2

Page 1

08/29/2016

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

DATE: 05/10/16

DEPT. 24

HONORABLE Robert L. Hess

JUDGE

G. Charles

DEPUTY CLERK

HONORABLE
#12

JUDGE PRO TEM

ELECTRONIC RECORDING MONITOR

B. Bell

C/A

Deputy Sheriff

None

Reporter

8:33 am

BS140207

Plaintiff
Counsel

Ashley Hunt

(x)

BAT WORLD SANCTUARY ET AL

Defendant
CounselMary Cummins
(by telephone)

(x)

VS

MARY CUMMINS

NATURE OF PROCEEDINGS:

MOTION TO MODIFY PROTECTIVE ORDER

The cause is called for hearing.

The Court will treat Ms. Cummins' papers filed May 4, 2016 as a reply.

With respect to the subpoena, the protective order is granted to the following extent:

1. The requesting party is limited to account holder.
2. The time frame is limited to July 1, 2012 and subsequently.

Plaintiff may seek records under the Cummins or Cobb names, and/or by Social Security Number.

When these records are received, they are not to be published or disclosed to any person who is not a party to this suit, or an attorney for a party, or an attorney's staff. These documents are not to be filed in court except under seal.

A copy of the minute order is sent via U.S. mail to plaintiff, who is to give notice.

Ashley Hunt

352-248169-10

CAUSE NO. 352-248169-10

FILED
TARRANT COUNTY
12/18/2015 10:01:21 AM
THOMAS A. WILDER
DISTRICT CLERKBAT WORLD SANCTUARY and
AMANDA LOLLAR
Plaintiffs,

v.

MARY CUMMINS,

IN THE DISTRICT COURT

352ND JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

AMENDED ORDER GRANTING MOTION FOR BANK RECORDS AUTHORIZATION

On the 14th of December the Court heard the Motion for Bank Records Authorization filed by Plaintiff, Amanda Lollar. Plaintiff appeared by and through her attorney by telephone. Defendant appeared by telephone.

After considering the motion and the arguments of the parties the Court finds the motion should be granted.

IT IS THEREFORE ORDERED that Defendant, Mary Cummins shall have a Bank Records Authorization in the following form which shall include Defendant's Social Security Number in the space indicated.

BANK RECORDS AUTHORIZATIONTO ALL BANKS AND FINANCIAL INSTITUTIONS:

I hereby authorize all banks and financial institutions to furnish to Randall E. Turner, Attorney, all account statements, account summaries, copies of cancelled checks, records of deposits and withdrawals, and any other records pertaining to any account of mine under my Social Security Number [REDACTED] during the period from August 27, 2010 to the present. See date below

I agree that a copy of this authorization may serve as an original.

SIGNED this 27th day of December, 2015.

This is page one of a two page document.
Not valid without page two.

Mary Cummins
Mary Cummins

Court Minutes
Transactions #

452

12-11-15
FILED
Randy Turner, Sp. Cummins

352-243169-10

IT IS FURTHER ORDERED that Defendant, Mary Cummins, shall sign the Bank Records Authorization and cause it to be delivered to Randall E. Turner at 1300 Summit Ave., Suite 600, Fort Worth, Texas 76102 no later than seven (7) days after receiving the authorization from Randall E. Turner by fax or mail.

IT IS FURTHER ORDERED that Defendant is entitled to copies of all records obtained with this authorization.

SIGNED this 18 day of December, 2015.

Mary Cummins is to get a copy of all communications to/from banks.

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


JUDGE PRESIDING

08/29/2016

1

REPORTER'S RECORD

VOLUME 1 OF 1

Cause No. 352-248169-10

BAT WORLD SANCTUARY X IN THE DISTRICT COURT
and AMANDA LOLLAR, X
 X
 Plaintiffs, X
 X
VS. X 141ST JUDICIAL DISTRICT
 X
MARY CUMMINS, X
 X
 Defendant. X TARRANT COUNTY, TEXAS

* - * - * - * - * - * - * - * - * - *

HEARING

* - * - * - * - * - * - * - * - * - *

BE IT REMEMBERED that on the 1st day of
April, 2016, the following proceedings came on to be
heard in the above-entitled and -numbered cause before
the Honorable John P. Chupp, judge presiding, held in
Fort Worth, Tarrant County, Texas.

The proceedings were reported by machine
shorthand.

EXHIBIT 4

Tina Fett, CSR

Official Court Reporter 141st District Court

08/26/2016

1 August 27th, 2010 to the present. Well, Mr. Turner
2 demanded and sent in another one that says January
3 1st, 2010 to the present, and Mr. Turner received
4 documents from January 1st, 2010 to the present, he
5 received records (inaudible) -- and he also illegally
6 got the records of Animal Advocates.

7 THE COURT: Okay.

8 MS. CUMMINS: The bank -- he -- I never
9 signed an authorization for Animal Advocates. I
10 couldn't if I wanted to. I can't authorize --

11 THE COURT: I think you have an issue
12 with your bank giving him those, and you might want to
13 talk to your bank and ask them why they gave him
14 documents that there wasn't an authorization for.

15 MS. CUMMINS: Yes, I will, but in any
16 case, Mr. Turner shouldn't -- if he realized he
17 accidentally got the documents, he shouldn't have looked
18 at them, and he should have returned them. The bank
19 has asked him twice to return them, because they
20 weren't authorized, and they weren't allowed to give
21 them.

22 THE COURT: Okay.

23 MS. CUMMINS: He is not allowed to have
24 those documents. So Mr. Turner has violated the
25 protective order on documents, and he violated the

08/29/2016

C E R T I F I C A T E

THE STATE OF TEXAS X

COUNTY OF TARRANT X

I, Christina Fett, Official Court Reporter in and for the 141st District Court, State of Texas, County of Tarrant, do hereby certify that the above and foregoing contains a true and correct transcription of all portions of evidence and other proceedings requested in writing by counsel for the parties to be included in this volume of the reporter's record in the aforementioned cause, all of which occurred in open court or in chambers and were reported by me.

I FURTHER CERTIFY that this reporter's record of the proceedings truly and correctly reflects the exhibits, if any, admitted by the respective parties.

I FURTHER CERTIFY that I have no financial interest in the matters shown herein, and that I am not related to any of the parties or their counsel.

I FURTHER CERTIFY that the total cost for the preparation of this reporter's record of the proceedings is \$234.00, and was paid by Plaintiff.

WITNESS MY OFFICIAL HAND this the 13th day of April, 2016.

/s/Christina Fett

Christina Fett, Texas CSR 4590

CSR Expires 12-31-17

Official Court Reporter, 141st District Court

Tom Vandergriff Civil Courts Building

100 N. Calhoun, 3rd Floor

Fort Worth, Texas 76196-0402

Telephone 817-884-1423

Facsimile 817-850-2944

08/26/2016

Tina Fett, CSR
Official Court Reporter 141st District Court

1 MS. CUMMINS: Yes.

2 THE COURT: Where is that?

3 MS. CUMMINS: Well, he filed a document
4 stating I signed something for January 2010 to January
5 of 2016, and I never signed that.

6 THE COURT: Okay. Where is it?

7 MS. CUMMINS: What?

8 THE COURT: Where is that document?

9 MS. CUMMINS: Mr. Turner filed it in
10 his reply.

11 THE COURT: Okay.

12 MS. CUMMINS: If he did -- if they
13 would have given him the documents accidentally, which
14 they did not, he still could never use them, because
15 they are the records of Animal Advocates.

16 THE COURT: Right. No, I don't
17 disagree with you. I think that the order that we
18 sent, wasn't that marked out in there? There was a
19 sentence in that order that was marked out so that he
20 couldn't get those records, right?

21 MS. CUMMINS: He was only allowed my
22 records with my name and social security number.

23 THE COURT: Right. Okay.

24 MS. CUMMINS: Well, specifically he
25 told you we sent it, called them up and demand Animal

08/29/2016

To: Fax File LA Court Page 34 of 43
-First Bank-

2016-08-26 19:52:41 (GMT)
3/31/2016 4:38:12 PM PAGE 11/011

13104949395 From: mary cummins
Fax Server



Member FDIC

February 22, 2016

VIA FACSIMILE 817/796-1414
AND U.S. MAIL

Randall E. Turner, Esq.
Law Offices of Randall E. Turner, PLLC
4255 Bryant Irvin Rd., Suite 210
Fort Worth, Texas 76109

Re: Bat World Sanctuary and Amanda Lollar v. Mary Cummins; Tarrant County
District Court Case No. 352-248169-10

Dear Mr. Turner:

Pursuant to the Court Order dated December 18, 2015 and the Bank Records Authorization executed by Mary Cummins on January 4, 2016 sent with your letter of January 7, 2015, First Bank forwarded certain documents to you related to Mary Cummins. In connection with the production of documents, documents related to a separate account in the name of Animal Advocates which had a separate federal identification number with Ms. Cummins as an authorized signatory were included in the production.

Ms. Cummins has notified First Bank that she objects to the production of records relating to Animal Advocates and you are hereby instructed to immediately return any and all documents relating to Animal Advocates. Further, you are not to release any documents related to Animal Advocates to Plaintiff or any other party and are further instructed to immediately notify this office that you will comply with this letter.

Sincerely yours,

Tina Shannon Daniels

Subpoena Department
314-592-8548

Cc: Mary Cummins

08/26/2016

16-18185Supplement No
ORIG**FORT WORTH POLICE DEPARTMENT****350 W. BELKNAP STREET****Fort Worth, Texas 76102**

Nature of Call

INFO ONLY**Fax 817-392-4201****817-392-4200**

Reported Date

02/24/2016

Member#/Dept ID#

BROTHERTON, R**Administrative Information**

| | | | | | |
|---|-------------------------------|---|-----------------------------------|---|--|
| Agency
FORT WORTH POLICE DEPARTMENT | | Report No
16-18185 | Supplement No
ORIG | Reported Date
02/24/2016 | Reported Time
12:01 |
| CAD Call No
160160689 | Status
Report taken | Nature of Call
Information only/no criminal offense | | | |
| Location
4225 BRYANT IRVIN RD | | | City
Fort Worth | ZIP Code
76109 | PRA
B210 |
| Division
W | Zone
W02 | From Date
02/12/2016 | From Time
14:23 | Member#/Dept ID#
2657/BROTHERTON, R | |
| Assignment
DRU 1st Shift | Entered by
2657 | Assignment
DRU 1st Shift | RMS Transfer
Successful | Prop Trans Stat
Successful | Property? Council Dist
None 03 |
| Approving Officer
403122 | | Approval Date
02/26/2016 | Approval Time
08:09:43 | | |

Person Summary

| Invl | Invl No | Type | Name | MNI | Race | Sex | DOB |
|------------|----------|----------|--------------------------------|----------------|----------|----------|-------------------|
| SUS | 1 | I | TURNER, RANDALL EUGENE | 1841318 | W | M | [REDACTED] |
| Invl | Invl No | Type | Name | MNI | Race | Sex | DOB |
| VIC | 1 | I | CUMMINS, MARY KATHERINE | 2635122 | W | F | [REDACTED] |

Summary Narrative

Victim 1 said that on 02/12/2016, at 1423 hrs., she was advised by fax from S1, that all the personal information obtained through discovery, is being held and used by S1 and possibly released to the related person which S1 was defending, to access 1's bank accounts in Beverly Hills, Ca., where Beverly Hills PD has made a report. Victim said S1 sent a fax admitting the having and non-compliance to release the information back to Victim 1.

EXHIBIT 8

| | | |
|---|---------------------------------------|-------------|
| Report Officer
2657/BROTHERTON, R | Printed At
04/26/2016 12:45 | Page 1 of 2 |
|---|---------------------------------------|-------------|

08/29/2016

16-18185

Supplement No
ORIG

FORT WORTH POLICE DEPARTMENT

Suspect 1: TURNER,RANDALL EUGENE

| | | | | | | |
|------------------------|----------------|----------------------------|-----------------------|------------|--------|------------|
| Involvement | Invl No | Type | Name | MNI | Race | Sex |
| Suspect | 1 | Individual | TURNER,RANDALL EUGENE | 1841318 | White | Male |
| DOB | Age | Ethnicity | Juvenile? | Height | Weight | Hair Color |
| | 62 | Non-Hispanic or Non-Latino | No | 5'10" | 170# | Brown |
| Eye Color | Res Status | OFN_INVL | Vic/Ofnd Age | PRN | | |
| Brown | Resident | 1 | 62 | 4243249 | | |
| Skin | Sexual Assault | Address | Rep Dist | Beat | | |
| Light | No | 4225 BRYANT IRVIN RD | B210 | W02 | | |
| Map Coordinates | City | State | ZIP Code | Date | | |
| 02303264 06936754 | Fort Worth | Texas | 76109 | 02/24/2016 | | |
| Type | ID No | OLS | | | | |
| Drivers License | | | | | | |
| Type | ID No | | | | | |
| Social Security Number | | | | | | |
| Phone Type | Phone No | Date | | | | |
| Business | (817) 420-9690 | 02/24/2016 | | | | |
| Relationship | Name | Race | Sex | DOB | | |
| Acquaintance | LOLLAR,AMANDA | White | Female | | | |
| Address | City | State | ZIP Code | | | |
| 217 N OAK AVE | MINERAL WELLS | Texas | 76067 | | | |

Victim 1: CUMMINS,MARY KATHERINE

| | | | | | |
|-----------------|-----------------------|-------------|------------------------|-----------|----------------|
| Involvement | Invl No | Type | Name | MNI | Race |
| Victim | 1 | Individual | CUMMINS,MARY KATHERINE | 2635122 | White |
| Sex | DOB | Age | Ethnicity | Juvenile? | Sexual Assault |
| Female | | 50 | Hispanic or Latino | No | No |
| Res Status | Vic/Ofnd Age | | | | |
| Non-Resident | 50 | | | | |
| PRN | | | | | |
| 4243250 | | | | | |
| Type | Address | City | State | | |
| Home | 645 W 9TH ST #110-140 | LOS ANGELES | California | | |
| ZIP Code | Date | | | | |
| 90015 | 02/24/2016 | | | | |
| Type | ID No | OLS | | | |
| Drivers License | | | | | |
| Phone Type | Phone No | Date | | | |
| Cell | (310) 877-4770 | 02/24/2016 | | | |

Modus Operandi

| |
|---|
| Premise Type |
| Law firm, office |
| Suspect Action |
| Suspects actions described in narrative |

Narrative

On 02/24/2016, Wednesday, at 1205 hrs., working X194 in the Data Reporting Unit., Officer RG Brotherton, 2657, was dispatched on a theft call, to 4225 Bryant Irvin Rd., and I contacted the caller, a Cummins, Mary Katherine, herein known as Victim 1/Cummins, and who stated the following:
Victim 1/Cummins said that she was sued civilly for defamation, and the attorney who prosecuted the case is a Turner, Randall Eugene, herein known as S1/Turner, and whose office is at 4225 Bryant Irvin Rd. His client in the lawsuit, is a Lollar, Amamda, who is listed under the related persons tab. Victim 1/Cummins relates that during this lawsuit, that under the rules of discovery, she was made to give her personal information, such as her TX DL, her soc. security number, etc., to S1/Turner. Since that time, Victim 1/Cummings said that S1/Turner faxed her, telling her that he has he personal information, and refusing to give it back. Victim 1/Cummins also related that S1/Turner forged 2 court orders.

RG Brotherton, 2657, X194, Data Reporting Unit.

08/29/2016

16-18185Supplement No
0001**FORT WORTH POLICE DEPARTMENT**

350 W. BELKNAP STREET

Fort Worth, Texas 76102

Nature of Call

Fax 817-392-4201

817-392-4200

Reported Date
02/25/2016Member#/Dept ID#
KNIGHT, T**Administrative Information**

| | | | | |
|---|--------------------------------------|------------------------------------|------------------------------------|----------------------------------|
| Agency
FORT WORTH POLICE DEPARTMENT | Report No
16-18185 | Supplement No
0001 | Reported Date
02/25/2016 | Reported Time
10:18 |
| Member#/Dept ID#
2880/KNIGHT, T | Assignment
Narcotics | Entered by
2880 | Assignment
Narcotics | |
| RMS Transfer
Successful | Prop Trans Stat
Successful | Approving Officer
403122 | Approval Date
02/26/2016 | Approval Time
08:10:16 |

Narrative

The following information was emailed to the FWRPD PIO email address (policemedia@fortworthtexas.gov) on February 24 at 1846 hours;

From: Mary Cummins [mailto:mmmarycummins@gmail.com]

Sent: Wednesday, February 24, 2016 6:46 PM

To: zz_CPD_PoliceMedia

Subject: Officer R.G. Brotherton - Forward request

Officer R.B. Brotherton took a police report today. He asked me to get back to him with some information he needed. He's gone for the day and there is no fax. Can you forward this to him in regard to police report 16-018185? His ID is 2657. I made the report today, 02/24/2016. Below is the info. Nothing is confidential.

Home address of Randy Turner is

Exact date of events

1/7/16 Randy Turner from Fort Worth, Texas sent the falsified bank authorization and order to First Bank, Beverly Hills, California branch. Randy Turner then called the bank and demanded the records of non-party Animal Advocates to which he was never entitled. The Judge specifically stated he could never have those documents. He was also not entitled to any records of anyone from 1/1/2010 to 08/26/2010.

1/11/16 Bank received his letter.

1/21/16 Bank sent the bank statements of non-party Animal Advocates to Randy Turner in Fort Worth, Texas. That account does not have my name or social security number on it.

2/08/16 Randy Turner faxed me and told me he got bank records from First Bank. He said he mailed me a copy on a thumb drive.

2/10/16 I retrieved the thumb drive from my mail box. I saw the bank records of Animal Advocates in there.

2/10/16 I faxed First Bank stating they were not allowed to give Randy Turner any records of Animal Advocates per the order.

2/10/16 I faxed Randy Turner that he stole the bank records through fraud and forgery

2/11/16 First Bank sent a demand letter to Randy Turner stating he was not authorized to have those records. He must return them and send them a letter stating he will not and has not used them. He never sent the letter or returned the statements.

I filed a motion for contempt of court orders, fraud, forgery, perjury and theft against Randy Turner. Bank and

| | | |
|---|---------------------------------------|-------------|
| Report Officer
2880/KNIGHT, T | Printed At
04/26/2016 12:45 | Page 1 of 2 |
|---|---------------------------------------|-------------|

08/27/2016

16-18185

Supplement No
0001**FORT WORTH POLICE DEPARTMENT****Narrative**

Court told me to file police reports.

that is not my personal bank account. I merely opened that account in 2002 for Animal Advocates in their EIN. Those bank statements have the names, addresses, home phone, driver's license, bank account, signatures, copies of checks, bank info of thousands of people who donated to Animal Advocates including many old time celebrities and large charitable organizations. I also donated years ago so my info is in there as well. The Beverly Hills police is trying to figure out a way to notify the people that Randy Turner illegally obtained their bank records from the bank.

Randy Turner and his client Amanda Lollar tried to take money from the Animal Advocates account and my personal account March 2013. I filed police reports March 19, 2013. They weren't able to get any money as I never use my real information for security questions. I always make up impossible, nonsensical answers.

Randy Turner's client Amanda Lollar is the one who pretended to be me to try to access two bank accounts. One is First Bank, Beverly Hills. Other was One West Bank, Bel Air, CA. Amanda Lorraine Lollar born

Her driver's license is [REDACTED]

My main goal is to have the bank records returned, never used. As the records have now been digitized by Randy Turner that will be difficult. Thanks for all your help.

--

Mary Cummins

Cummins Real Estate Appraisals

<http://www.MaryCummins.com> <<http://www.marycummins.com/>>

(310) 877-4770

30 years experience

Se habla Espanol!

Resume <<http://www.marycummins.com/marycumminscurriculumvitae.pdf>>

Sent with MailTrack

<<https://mailtrack.io/install?source=signature&lang=en&referral=mmmarycummins@gmail.com&idSignature=22>>

08/26/2016

16-18185Supplement No
0002**FORT WORTH POLICE DEPARTMENT**

350 W. BELKNAP STREET

Fort Worth, Texas 76102

Nature of Call

Fax 817-392-4201

817-392-4200

Reported Date
04/12/2016Member#/Dept ID#
TABB, T**Administrative Information**

| | | | | | |
|---|--------------------------------------|------------------------------|------------------------------------|------------------------------------|------------------------------------|
| Agency
FORT WORTH POLICE DEPARTMENT | | Report No
16-18185 | Supplement No
0002 | Reported Date
04/12/2016 | Reported Time
12:25 |
| Member#/Dept ID#
403122/TABB, T | | | Assignment
DRU 1st Shift | Entered by
403122 | Assignment
DRU 1st Shift |
| RMS Transfer
Successful | Prop Trans Stat
Successful | Property?
None | Approving Officer
403122 | Approval Date
04/12/2016 | |
| Approval Time
12:28:42 | | | | | |

Narrative

On 04/11/16, VIC sent the following message through FWPD's website:

The same person used another forged authorization and stole the PayPal records of me and non-profit Animal Advocates. The person admitted they stole these documents in writing. Previously they stole bank records. Again, they admitted it in court in a civil hearing.

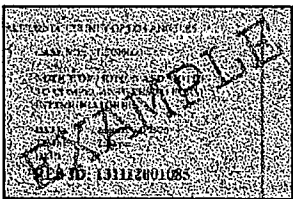
The bank demanded the documents back but the person has refused. Thanks

9106757780

7/13/2016

Reservation Printout: BS140207-160713142795

CRS RECEIPT

| INSTRUCTIONS |
|--|
| Please print this receipt and attach it to the corresponding motion/document as the last page. Indicate the Reservation ID on the motion/document face page (see example). The document will not be accepted without this receipt page and the Reservation ID. |
|  |

RESERVATION INFORMATION

Reservation ID: **160713142795**
 Transaction Date: July 13, 2016 9:14 AM
 Case Number: BS140207
 Case Title: BAT WORLD SANCTUARY ET AL VS MARY CUMMINS
 Party: CUMMINS MARY (Defendant & Defendant in Pro Per)
 Courthouse: Stanley Mosk Courthouse
 Department: 24
 Reservation Type: Motion to Quash
 Date: 8/26/2016
 Time: 08:30 am

FEE INFORMATION (Fees are non-refundable)

First Paper Fee: Party asserts first paper was previously paid.

| Description | Fee |
|--------------------|----------------|
| Motion to Quash | \$60.00 |
| Total Fees: | \$60.00 |

PAYMENT INFORMATION

Special Condition

FEE WAIVED: Cbv Code: SEP: Intersec
 The reserving party asserts possession of a valid fee waiver approved by the court on 02/19/2016. Validity must be confirmed at the time of filing the motion/document. Proof of

<https://www.lacourt.org/mrs&i/printablereceipt.aspx?id=undefined>

8/29/2016

7/13/2016

Reservation Printout-BS140207-160713142785

granted fee waiver may be requested by the Clerk.
Waived fees are recoverable (plus an administrative fee and any fees associated with the
recovery of previously waived fees).

**A COPY OF THIS RECEIPT MUST BE ATTACHED TO THE CORRESPONDING
MOTION/DOCUMENT AS THE LAST PAGE AND THE RESERVATION ID INDICATED ON THE
MOTION/DOCUMENT FACE PAGE.**



Mary Cummins <mmmarycummins@gmail.com>

Court Call August 26, 2016 8:30 a.m. Dept 24

1 message

Mary Cummins <mmmarycummins@gmail.com>

Thu, Aug 25, 2016 at 9:47 AM

To: christian@christiansmolnarlaw.com, ashley.hunt@alumni.ils.edu

Attached is proof of service of court call.



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

Sent with MailTrack

2 attachments pos court call 08252016.pdf
176K FINAL fax_file_reply_plaintiff_reply_quash.pdf
1625K

08/29/2016

EXHIBIT 5

DEPARTMENT OF MOTOR VEHICLES PLACARD IDENTIFICATION CARD

THIS IDENTIFICATION CARD OR FACSIMILE COPY IS TO BE CARRIED BY THE PLACARD
HOLDER. PRESENT IT TO ANY PEACE OFFICER UPON DEMAND. IMMEDIATELY NOTIFY DMV
PHONE OR MAIL OF ANY CHANGE OF ADDRESS. WHEN PARKING, HANG THE PLACARD
ON THE REAR VIEW MIRROR. REMOVE IT WHEN DRIVING.

CARD# 12723/2016 PLACARD HOLDER: CUMMINS MARY K
STREET: 645 W 9TH ST 110 140
CITY: LOS ANGELES
STATE: CA ZIP: 90015
EXPIRATION DATE: 07/12/16
TYPE: N2

RECHARGE OF FUEL (BUSINESS & PROFESSIONS CODE 13660):

THE LAW REQUIRES SERVICE STATIONS TO REFUEL A DISABLED PERSON'S VEHICLE
SELF-SERVICE RATES, EXCEPT SELF-SERVICE FACILITIES WITH ONLY ONE CASHIER

IN YOUR PLACARD IS PROPERLY DISPLAYED, YOU MAY PARK IN/ON:

*DISABLED PERSON PARKING SPACES (BLUE ZONES) *STREET METERED ZONES WITHOUT
TIMING *GREEN ZONES WITHOUT RESTRICTIONS TO TIME LIMITS *STREET WHERE
PREFERENTIAL PARKING PRIVILEGES ARE GIVEN TO RESIDENTS AND MERCHANTS

YOU MAY NOT PARK IN/ON: *RED ZONES *TOW AWAY ZONES *WHITE OR YELLOW ZONES
SPACES MARKED BY CROSSHATCH LINES NEXT TO DISABLED PERSON PARKING SPACES

IT IS CONSIDERED MISUSE TO DISPLAY A PLACARD UNLESS THE DISABLED OWNER
BEING TRANSPORTED TO, DISPLAY A PLACARD WHICH HAS BEEN CANCELLED OR
VOIDED *NO LOAN YOUR PLACARD TO ANYONE, INCLUDING FAMILY MEMBERS
USED AS A MEDICINE CAB (SECTION 44140) AND CAN RESULT IN CANCELLATION OF
REGISTRATION OF THE PLACARD, LOSS OF PARKING PRIVILEGES, AND/OR FINES.

17972016