

BAT WORLD SANCTUARY
AND AMANDA LOLLAR

Plaintiffs,

v.

MARY CUMMINS

Defendant.

§
§
§
§
§
§
§
§
§
§

IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

352nd JUDICIAL DISTRICT

MOTION TO RECONSIDER PROTECTIVE ORDER AS TO DISCLOSURE OF HOME ADDRESS

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, MARY CUMMINS, hereafter referred to as "Movant", and pursuant to Tex.R.Civ.Pr. 192.6 moves this Court to reconsider its denial of Movant's Motion For Protective Order As To Disclosure Of Home Address, and in support would show the following:

I.

BACKGROUND

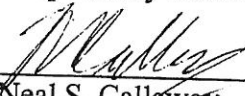
On July 21, 2011, the Court heard argument on Movant's Motion For Protective Order as to certain items of written discovery requested of Defendant by Plaintiffs. Plaintiffs have requested Movant's home address in both their interrogatories propounded on Movant and in their Duces Tecum attached to their Notice Of Deposition of Movant. The Court denied Movant's Motion as to home address stating in part as follows:

She's going to have to produce her address, and she's going to have to produce her net worth. I think they're both discoverable. And I don't have any evidence in front of me that would-that would give me any reason not to treat her like any other party in the court, as far as producing information about her address and net worth.

The Court specifically found that it did not have any evidence in front of it as to why home address should not be produced, therefore, Movant would like the opportunity to present live testimony and written evidence of threats to her that make her fear for her personal safety if required to produce her home address. Attached hereto are excerpts of internet postings containing threats to Movant.

WHEREFORE, Movant requests that on final hearing on this matter, the Court reconsider its earlier ruling and enter its protective order, and grant the Movant protection from having to disclose her home address and grant such other and further relief to which Movant may show herself entitled.

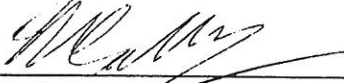
Respectfully submitted,



Neal S. Callaway
Texas Bar Card No. 03657020
LAW OFFICES OF NEAL S. CALLAWAY
1200 Summit Ave., Suite 720
Fort Worth TX 76102
817/332-2076; FAX 817/877-5661
ATTORNEY FOR MOVANT

CERTIFICATE OF CONFERENCE

I hereby certify that on this the 9th day of August, 2011, I conferred with counsel for Plaintiffs, Randall E. Turner, by telephone, and an agreement could not be reached on the merits of this Motion To Reconsider Protective Order As To Disclosure Of Home Address.




Neal S. Callaway

CERTIFICATE OF SERVICE

This is to certify that on the 10th day of August, 2011, a copy of the foregoing was served by regular to the following counsel of record:

Randall E. Turner
LAW OFFICE OF TURNER & MCKENZIE
1800 N. Norwood Drive, Suite 100
Hurst, Texas 76054



Neal S. Callaway

... season right around the corner, make sure to follow these few simple tips.
[http://articles.moneycentral.msn.com/Taxes/PreparationTips/PreparationTips.aspx?
icid=HMFebtagline](http://articles.moneycentral.msn.com/Taxes/PreparationTips/PreparationTips.aspx?icid=HMFebtagline)

From: ghuang909@yahoo.com
To: Mary@animaladvocates.us
Sent: Mon, 22 Jan 2007 22:02:47 -0800 (PST)

Subject: Mary Cummins: Whore who fucked with the wrong person
Get ready bitch.

Don't pick lemons.
See all the new 2007 cars at Yahoo! Autos.

In a message dated 5/5/2006 12:30:35 AM Pacific Daylight Time,
maryisfinished@hotmail.com writes:

You're finished around here, Mary. Kiss your job and your home GOOD BYE.
I know you fancy yourself tech savvy (you're not; I am), so I'll help you
out. The IP address I'm using isn't mine. Those public access site are a
bitch, aren't they? God bless Starbucks!
Now go polish your gun like a good little whore. No one's intimidated.

In a message dated 5/7/2008 12:03:22 AM Pacific Daylight Time,
maryisfinished@hotmail.com writes:

We will find you! You can run but you cant hide! We're smarter than you with friends on the inside. When we find you, get ready for it, fat fucking whore. The world will be a better place without you and your whore mouth.

In a message dated 7/11/2008 04:04:18 AM Pacific Daylight Time,
maryisfinished@hotmail.com writes:

You'll soon be gone. Say goodnight. You fucked with the wrong person.

In a message dated 7/11/2008 04:16:43 AM Pacific Daylight Time,
maryisfinished@hotmail.com writes:

I can see you! I'm coming for you!

New User? Register Sign In Help

Trending: Pippa Middleton

Yahoo! Mail

YAHOO! GROUPS

Search

Web Search



Bachelor's Degrees

Business Nursing
Education Communications
Criminal Justice Health Admin.

Master's Degrees

MBA Education Nursing

Doctoral Degrees

Business Admin. Health Admin.

Online and Campus Programs

Learn More

worldbatline · World Bat Line

Search for other groups...

Search

Home
Messages



Click here for the latest updates on Groups Message search

Members Only

- Post
Files
Photos
Links
Database
Polls
Calendar
Promote
Groups Labs (Beta)

Already a member? Sign in to Yahoo!

Yahoo! Groups Tips

Did you know... Message search is now enhanced, find messages faster. Take it for a spin.

Best of Y! Groups



Check them out and nominate your group.

Messages

Messages Help

Message # [] Go Search: [] Search Advanced

Re: Public Archives (long-ish)

Message List

Reply

Message #33690 of 33690 Prev | Next >

I, too, agree with Sherry K in that before one can speak intelligently about a topic, one must research, question and search out answers and still apply common sense. I have seen the toxicity that MC started on facebook a while back. Apparently this 'person' is a few bricks short of a load as anyone who flouts a courts order to cease her actions is just plain stupid beyond words.

Thu May 12, 2011 10:45 pm

Show Message Option

"Sharon Warner" <Schlpmom1@...>
evidtech9
Offline
Send Email

Secondly, the fact that she does any of what she does (videotaping/blogging/etc) and then turns it around to harm others is vile and disgusting beyond thoughts. She is evil, mean-spirited and nasty. I have no clue what her life history is that causes these actions nor do I know if she is on meds and not taking them so as to not contain her spewing bile as she does. The character of Charles Winchester (MASH) said it best. I find Mary Cummins to be 'an inflamed boil on the buttocks of the world'.

What I DO know, is that even though I have never met Amanda, I have spoken to her on occasion when I needed to sponsor bats or get materials for the 4H group I assist and having been a cop, I can 'read' a kindred spirit quickly. This is Amanda and sadly our world would be much better for a lot of things if half the

populace had half of the compassion, dedication, gumption, intelligence and fortitude Amanda demonstrates. I shudder to think where any bat population or bat individual (insect or fruit-eating) would be had she not discovered Sunshine on a pavement one day. There would be too many haunting deaths due to 'innocent ignorance' on how to treat bat injuries, trauma or just overwintering by those who are trying to rehab without the hardwon knowledge and research/trials she has shared worldwide.

In this day of apathy, I happen to one of the small group of folks who choose to stand for something and I have no problem in saying I would follow Amanda to the gates of Hell if she would ask it of me because I RESPECT her, what she stands for, what she has done to better many bat lives, educate many bat lovers, add to the knowledge of what bats are all about. Opinions are like a*****les, we all have one but when someone such as Psycho Mary goes beyond that and interferes with the integrity of an entity that has done worldwide good, then it rouses my ire due to the repercussions that living creatures will suffer if donations and monetary support dwindles because of her vindictive vendetta. That is the greater wrong in any of our worlds if we care one iota about any animal/bird/reptile or living creature.

If Karma is paying attention, it needs to strike Ms Cummins with a mighty blow so that she's no longer here or a vegetable and harmless. Yes, I wrote what a lot of folks are possibly thinking. If any of those beloved bats at Bat World Sanctuary suffer due to Cummins bile spewing, there's no place safe on this planet for her to hide as too many decent people will have reached their limits.

Sharon Warner
Harrisburg PA

[Non-text portions of this message have been removed]

Party

Message #33690 of 33690 < Prev | Next >

Comments (1)

Share this review:

Like

Log in to post a comment

Rebecca D. wrote:

May 19, 2011

This post by Mary Cummins is in response to a lawsuit filed against her by Bat World Sanctuary and Amanda Lollar. I am friends with Amanda and support her legal battle and am therefore a target for Mary's abuse. I'd be pleased to set the record straight on the above dark and twisted claims and allegations - just drop me a line - rebecca@wildrescue.org For more on the lawsuit or Mary's history of cyber attacks, please visit a blog that was set up by a former victim: <http://victimsofmisscummins.blogspot.com/>

Page (1 of 1)

NEAL S. CALLAWAY
ATTORNEY AT LAW

Mailing Address:
P.O. BOX 17129
FORT WORTH TX 76102-0129

Telephone 817/332-2076
Facsimile 817/877-5661
email: ncallawa@swbell.net

August 10, 2011

Clerk
352nd Judicial District Court
Eighth Floor
401 West Belknap
Fort Worth TX 76196-0223

RE: *Bat World Sanctuary and Amanda Lollar v. Mary Cummins*, Cause No.
352-248169-10 in the 352nd Judicial District Court, Tarrant County, Texas.

Dear Clerk:

Enclosed please find original and one copy of Motion To Reconsider Protective Order As To Disclosure Of Home Address. Please file the original in the Court's file and return the file stamped copy of the Motion to me in the enclosed stamped and self addressed envelope. Thank you.

Sincerely,


Neal S. Callaway

tj

cc: Randall E. Turner
LAW OFFICE OF TURNER & MCKENZIE
1800 N. Norwood Drive, Suite 100
Hurst, Texas 76054