

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

MARY CUMMINS
Plaintiff,

vs.

**AMANDA LOLLAR, BAT WORLD
SANCTUARY, JOHN DOES 1-10**

Defendants.

) **Civil Action No.: 4:12-CV-00560-Y**
)
)

) **PLAINTIFF’S MOTION TO EXTEND
TIME TO REPLY TO DEFENDANTS’
DISCOVERY REQUESTS**
)
)

) **JURY TRIAL**
)
)
)

**PLAINTIFF’S MOTION TO EXTEND TIME TO REPLY TO DEFENDANTS’
DISCOVERY REQUESTS**

August 26, 2014 Judge Jeffrey L. Cureton signed a court order (Doc 122) ordering Plaintiff Cummins to reply to Defendants’ Discovery Requests by September 18, 2014. Judge Cureton further invited Defendants, Plaintiff to agree to a protective order and present the proposed joint order to the Court.

Plaintiff and Defendants met and conferred about a protective order. Plaintiff and Defendants have not come to an agreement on the protective order. Plaintiff cannot turn over the requested confidential and private medical records requested in discovery without first having a signed protective order to protect said documents. Defendant Amanda Lollar has a very, very long history of abusing discovery for harassment purposes, violating protective orders, sharing confidential information obtained through discovery i.e. social security number, driver license number, date of birth, place of birth, mother’s maiden name. Defendant Lollar used all of this data obtained in discovery of a previous case to pretend to be Plaintiff to illegally access Plaintiff’s bank account and the bank account of an unrelated non-profit. A police report was

filed. Bank telephone records proved that Lollar did indeed try to access Plaintiff's account with the aide of discovery items. Defendant would definitely again abuse discovery.

PRAYER

Defendant respectfully requests this court to extend the time to formulate a mutually agreed upon protective order and reply to discovery requests for two weeks, until October 2, 2014.

Respectfully submitted,



Mary Cummins, Plaintiff
645 W. 9th St. #110-140
Los Angeles, CA 90015-1640
September 17, 2014

CERTIFICATE OF CONFERENCE

On September 2, 3, 16, 17, 2014, I conferred with Daniel Sullivan attorney for Plaintiffs Amanda Lollar, Bat World Sanctuary. There was no mutually agreed upon and signed protective order.

Respectfully submitted,



Mary Cummins, Plaintiff

645 W. 9th St. #110-140

Los Angeles, CA 90015-1640

September 17, 2014

CERTIFICATE OF SERVICE

I, Mary Cummins, hereby certify that a copy of PLAINTIFF'S MOTION TO EXTEND TIME TO REPLY TO DEFENDANTS' DISCOVERY REQUEST were 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

Respectfully submitted,



Mary Cummins, Plaintiff
645 W. 9th St. #110-140
Los Angeles, CA 90015-1640
September 17, 2014