

CAUSE NO. 352-248169-10

**BAT WORLD SANCTUARY and  
AMANDA LOLLAR,  
*Plaintiffs***

**v.**

**MARY CUMMINS,  
*Defendant***

§  
§  
§  
§  
§  
§  
§  
§  
§

**IN THE DISTRICT COURT**

**TARRANT COUNTY, TEXAS**

**352nd JUDICIAL DISTRICT**

---

**POST-JUDGMENT MOTION FOR CONTEMPT**

---

**To The Honorable Judge of Said Court:**

Now comes Amanda Lollar, Plaintiff and Movant herein, and moves this Court to find Mary Cummins, Defendant, in contempt of court for failing and refusing to obey an injunction issued by this Court. Mary Cummins may be served with process at 645 W. 9<sup>th</sup> St., #110-140, Los Angeles, California 90015 or wherever she may be found. In support hereof, Movant shows the following:

I.

On August 27, 2012 this Court signed a final judgment in this case following a three and a half day trial. A copy of the judgment is attached hereto as Exhibit 1. In the judgment the Court permanently enjoined Defendant and ordered her to permanently remove certain statements from the internet. Mary Cummins was present in this court when the judge orally issued the order and she received a copy of the final order after it had been reduced to a final written judgment. The final judgment specifically enjoined Defendant and ordered her to permanently remove the following statements from the internet:

1. "They breed animals in the facility."
2. "Pretty ironic for this group to certify Bat World Sanctuary when the health department told her to leave town and they had to gut the building and remove her belongings."
3. "Vet recommended blood and stool tests. Lollar declined. She just wants empirical therapy. If that doesn't work, she wants to euth the dog. She refused treatment. When I was at Bat World June 19, 2010 to June 28,2010 I saw her use her fingers to pull out one of the dog's , i.e. oral surgery on dogs."
4. "The current method she suggests is also inhumane. The bats die of suffocation. She also forgets to mention that the drugs she suggests must be used under the direction of a veterinarian. She doesn't even administer the gas illegally humanely, or safely."
5. "I'm sure he realizes his client is guilty of animal cruelty, animal neglect, violations of the health code, Animal Welfare Act, Texas Parks & Wildlife Department not to mention libel, defamation, yet he is aiding and abetting her."
6. "I doubt he'll be speaking about this embarrassing little case where he is actually representing someone who commits animal cruelty and neglect."
7. "She took the money that came from the dissolution of Bonnie Bradshaw's group and bought a new silver Honda Eclipse. That money was supposed to go for animals. This is what Lollar does with money that is given to Bat World."
8. "Lollar never even washed her hands before surgery, you can see dirty finger nails in the photos, no surgical garments, no mask, hat, nothing. Night and day."
9. "Just confirmed that Amanda Lollar of Bat World Sanctuary is illegally obtaining human and animal rabies vaccinations ... .Again, breaking the law. I'm amazed she admitted to having the

vaccine and buying it when she is doing it illegally.”

10. “She does not state that it died from neglect of care. She also chose to euth it instead of treating it as her vet suggested. She'd previously turned down care which her vet suggested.”

11. “When I was at Bat World she told me the place where she buys her rabies vaccine thinks he's a doctor.”

12. “Earlier in the year the vet noted the dog had major dental issues yet she didn't have the vet treat them. You know how painful it would be to have a mouth full of rotten teeth? That's animal neglect.”

13. “BREAKING NEWS!!! Amanda Lollar of Bat World Sanctuary admits in writing that she and Bat World Sanctuary are being forced to leave Mineral Wells because of all the complaints to the City and Health Department.”

14. “The dogs rear claws are super long. There is no way she could stand .... She has to drag herself on cement.”

15. “She tells people to use Isoflurane illegally, inhumanely and unsafely in her book.”

16. “He didn't care that she admitted to illegally having the human rabies vaccination, admitted to using drugs not according to the label or that she "proudly" admitted to performing surgery.”

17. “In the video Lollar takes tweezers and just pulls out the molars of a conscious bat that is fighting and biting her while it bleeds. Lollar is proud of this and posted this video in her book and online. Bat experts know that bats must be unconscious and intubated to remove molars. Can you imagine the pain that bat felt?

18. "Pulling molars out of conscious bats is not "cutting-edge" though cutting open conscious bats might fall into that "category." Operating on bats using the drop anesthesia technique or amputating wings instead of pinning them is also not cutting edge but cave man veterinary practice."
19. "Lollar is exposing people to rabies by not checking their cards."
20. "Her recent story about the episiotomy at the depo was that, that was not the bat's vagina and uterus being pulled out. It was the "placenta separating." It clearly was not."
21. "She'd already yanked out the placenta which is what helped cause the prolapse, besides cutting way too much and pulling too hard. She really needs to get her vision checked. Someone with very bad vision is the last person who should be slicing into micro bats."
22. "Yeah, I look like crap in the videos but at least there are no videos of me hacking an animal to death."
23. "She's been breeding her bats illegally. She's committing fraud asking for money for a project she cannot and will not do."
24. "She said she would use the bag for the trip then return it to Walmart for a refund. She admitted to me with an evil laugh that she does this frequently."
25. "Rabies complaint against Bat World Sanctuary. General sanitation laws, harboring high risk rabies animals, allowing them in downtown."
26. "Amanda Lollar and her buildings have been written up so many times for building violations, safety issues, rabies, histoplasmosis, no address, unsightly building, build up of guano 6-8 feet. .. People have been reporting her smelly building and rabid bats for over 15 years."

27. "She's basically experimenting on bats. The bats are dying because she doesn't take them to the vet. That's okay because she can just go get more bats."
28. "Amanda Lollar of Bat World Sanctuary found guilty of illegally breeding bats at her facility. It is a violation of her permit."
29. "Amanda Lollar of Bat World Sanctuary is now sending threats of extortion from Mineral Wells, Texas. Because she's sending it over the computer it's a Federal crime."
30. "She has violated the following regulations listed on her permit. "15 a. Permit holder is prohibited from a. Propagating, selling or bartering animals or animal remains received or held under authority of this permit." She is allowing the bats to breed."
31. "The complaints going back 18 years were about alleged animal cruelty, animal neglect, violations of the health code and building and safety regulations."
32. "The complaints stretching back 18 years were about animal cruelty, animal neglect, violations of the health code, violations of Texas Parks & Wildlife regulations, violations of the Animal Welfare Act, building violations and a report about a rabid bat biting a toddler directly next door to Bat World Sanctuary."
33. "Here is the disgusting photo of my face which they photoshooed semen onto. They then added the caption "Yep, screw you too, Mmmmary!" They named the file "mmmm." This is how disgusting and childish these people.
34. "She's the one who handles rabid bats with her bare hands."
35. "Update: Health Dept. forced Bat World Sanctuary to leave town. In January they gutted the building, cleaned it and removed her property."

36. "Bat World Sanctuary admits in writing they are being forced to leave the City because of all the complaints to the City and Health Dept."

37. "Update: Health Dept. forced Bat World Sanctuary to leave town. They gutted her building, cleaned it and removed her property."

38. "Amanda Lollar commits animal cruelty at Bat World Sanctuary."

39. "Health Dept. forced Bat World Sanctuary to leave town. They gutted her building, cleaned it and removed her property."

40. "Bat World Sanctuary admits in writing they are being forced to leave the City because of all the complaints to the City and Health Dept."

## II.

Defendant was duty-bound to obey the commands of the Court contained in the judgment. Defendant failed and refused, and continues to fail and refuse to obey the commands of the Court. Specifically, Defendant has intentionally violated the Court's order by failing and refusing to permanently remove the above-described statements from the internet. Each statement which Defendant failed and refused to permanently remove constitutes a separate act of contempt of court.

## III.

Rule 692 of the Texas Rules of Civil Procedure sets forth the procedure for punishment for contempt of court. The rule provides that a judge may issue a show cause order requiring a person to appear on such date as may be designated and show cause why he should not be adjudged in contempt of court. On return of such show cause order, the judge shall proceed to hear proof, and if satisfied that such person has disobeyed the injunction, either directly or

indirectly, may commit such person to jail without bail until he purges himself of such contempt, in such manner and form as the judge may direct.

VI.

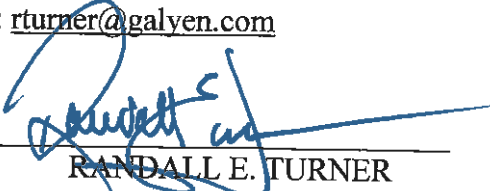
Because Defendant, Mary Cummins, continues to fail and refuses to obey the commands of the Court contained in the injunction, Movant has no alternative but to institute this contempt proceeding to have Defendant held in contempt of court and punished in accordance with Rule 692 of the Texas Rules of Civil Procedure.

WHEREFORE, Movant requests that Defendant, Mary Cummins, be ordered to appear before the Court at a designated date and time and show cause why she should not be held in contempt of court for violations of the injunction contained in the August 27, 2012 Final Judgment and punished accordingly.

Respectfully submitted,

BAILEY & GALYEN  
1300 Summit Ave., Suite 650  
Tel: 817.471.1241  
Fax: 817.764.6336  
Email: [rturner@galyen.com](mailto:rturner@galyen.com)

By: \_\_\_\_\_

  
RANDALL E. TURNER  
SBN: 20328310  
Attorney for Plaintiffs