

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

MOTION FOR CRIMINAL CONTEMPT OF COURT

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COME Plaintiffs, Bat World Sanctuary and Amanda Lollar, Movants herein, and request that Mary Cummins be held in criminal contempt of court. In support of this motion, Movants will show the Court the following:

I.

On November 28, 2011 this Court signed an order ordering Mary Cummins to furnish and disclose to Randall Turner, attorney for the plaintiffs, her home address within **10** days. Defendant, Mary Cummins, has failed and refused to disclose her home address and should be held in contempt of court for her refusal to comply with the Court's order.

On January 10, 2012 this Court signed an order ordering Mary Cummins to pay plaintiffs, Bat World Sanctuary and Amanda Lollar, the sum of one hundred dollars (\$100) each day beginning January 9, 2012 until Mary Cummins discloses her home address to Randall Turner.

As of the date of filing this motion Mary Cummins has refused to disclose her home address to Randall Turner and has stated that she will not disclose that address even though she was ordered to do so by the Court. Mary Cummins has further refused to pay \$100 for each day that has not disclosed her home address.

Mary Cummins has repeatedly and deliberately refused to obey the order of this Court and has contemptuously flouted this Court's repeated order to disclose her address.

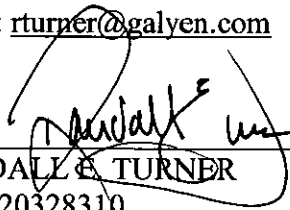
II.

Movants pray that Mary Cummins be held in criminal contempt of court and that she be jailed for a period of six (6) months and ordered to pay a \$500 fine.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs request that the Court hold Mary Cummins in criminal contempt of Court and commit her to jail for a period of six (6) months and fine her \$500.

Respectfully submitted,

BAILEY & GALYEN
1901 Airport Freeway
Bedford, Texas 76021
Tel: 817-359-7065
Fax: 817-276-6030
Email: rturner@galyen.com

By: 

RANDALL E. TURNER
SBN: 20328310
Attorney for Plaintiffs

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

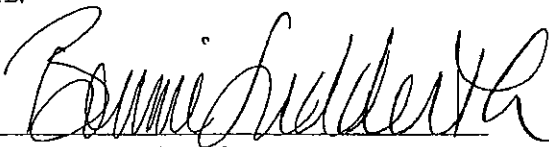
ORDER ON PLAINTIFFS' MOTION FOR CONTEMPT

On the 9th day of January, 2012 came on to be heard the motion for contempt filed by the plaintiffs. The plaintiffs appeared in person and by their attorney and announced ready. The defendant, Mary Cummins, appeared pro se and announced ready.

After hearing the evidence and arguments the Court finds that Mary Cummins failed and refused to obey the Court's order that was signed on November 28, 2011 which ordered her to furnish and disclose to Randall Turner her home address within ten days after the Court signed that order. Therefore, the Court finds that Mary Cummins is in contempt of court.

IT IS ORDERED THAT Mary Cummins pay to the plaintiffs, Bat World Sanctuary and Amanda Lollar, the sum of one hundred dollars (\$100) each day beginning January 9, 2012 until

Mary Cummins discloses her home address to Randall Turner ~~as set forth~~ *under the conditions regarding nondisclosure as set forth in the November 28, 2011 order*
SIGNED this 10 day of January, 2012.

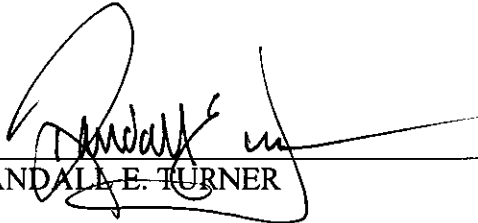

JUDGE PRESIDING

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served upon the Attorney of record (or Pro Se Defendant) of all parties to the above-entitled and numbered cause in accordance with TEX. R. CIV. P. 21a, on this 26 day of January, 20 12, by the following method:

- personal delivery
- telephonic document transfer (fax)
- certified mail
- courier receipted delivery

Via Facsimile: (310)494-9395
Mary Cummins, Defendant
645 W. 9th St., #110-140
Los Angeles, California 90015



RANDALL E. TURNER

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

FIAT

Plaintiffs' Second Motion for Criminal Contempt was filed on 01/26/2012. Plaintiff requests that the foregoing be set for hearing on February 9, 2012..

IT IS THEREFORE ORDERED that a hearing before this court on said Motion be set for the _____ day of _____ at _____ a.m./p.m. in the 352nd District Court of Tarrant County, Fort Worth, Texas.

Date _____.

Judge Presiding