Cause No. 352-248169-10

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BAT WORLD SANCTUARY and AMANDA LOLLAR.

Plaintiffs.

VS.

MARY CUMMINS.

Defendant Pro se

IN THE DISTRICT COURT *ಅಂತಾ ರಾ ರಾ ರಾ ರಾ ರಾ ರಾ ರಾ ರಾ*

TARRANT COUNTY, TEXAS

352nd JUDICIAL DISTRICT

DEFENDANT'S MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

Mary Cummins. Defendant Pro se, files this Motion for Continuance, and in support shows the following:

١.

This case is presently set for trail the week of January 9, 2012.

2.

Defendant needs a continuance for the following reasons:

- a. Plaintiff and Defendant have not yet had a mediation proceeding. Scheduling has been difficult because of the holiday season and upcoming trial date. Both Plaintiff and Defendant have agreed to mediation proceedings. The mediation just needs to be scheduled after the new year due to scheduling conflicts. Currently mediation is possibly scheduled for January 3, 2012. That date is only a few days before the trial and may not even be available.
- b. Defendant has not yet received Defendant's third request for production. These discovery documents are vital to this case.

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Turner & McKenzie

Hurst, Texas 76054 Fax: 817-268-1563

1800 N. Norwood Dr # 100

this 12th Day of December, 2011

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CERTIFICATE OF SERVICE

I, Mary Cummins, hereby certify that a TRUE COPY of the above MOTION FOR

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CONTINUANCE was served on the Plaintiffs' Attorney of record by FAX and by FIRST **CLASS MAIL at** Randy Turner

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Mary/Cummins, Defendant Pro se

645 W 9th St, #110-140

Los Angeles, CA 90015-1640

Phone 310-877-4770

Email: mmmaryinla@aol.com

Cause No. 352-248169-10

BAT WORLD SANCTUARY and AMANDA LOLLAR,	§ IN THE DISTRICT COURT	
Plaintiffs,	§ IN THE DISTRICT COURT § § § § TARRANT COUNTY, TEXAS § § § § § § § § § § § § § § § § § §	
vs.		
MARY CUMMINS,	2	
Defendant Pro se	§ 352nd JUDICIAL DISTRICT	
FIAT Defendant's MOTION FOR CONTINUANCE was filed on 12/11/2011. Defendant		
requests that the foregoing be set for hea	ring.	
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	

Cause No. 352-248169-10 1 IN THE DISTRICT COURT 2 **BAT WORLD SANCTUARY and** *တက တကတတာတာတာတတ* AMANDA LOLLAR, 3 Plaintiffs, 4 TARRANT COUNTY, TEXAS VS. 5 MARY CUMMINS, 6 352nd JUDICIAL DISTRICT **Defendant Pro se** 7 8 9 **DEFENDANT'S MOTION FOR TELEPHONIC HEARING** 10 1.1 12 TO THE HONORABLE JUDGE OF SAID COURT: 1.3 14 Mary Cummins, Defendant Pro se, files this Motion for Telephonic Hearing, and in 15 support shows the following: 16 ١. 17 The hearing is for Defendant's Motion for Continuance in the above styled cause 18 filed December 12, 2011. Hearing date has not yet been set. 19 2. 20 Defendant resides in Los Angeles County, California and their appearance by 21 telephone would be the most expedient method of resolving the issues for all parties 22 involved. 23 3. 24 No party in this action will suffer any prejudice if Defendant appears telephonically. 25

MOTION FOR TELEPHONIC HEARING

CERTIFICATE OF SERVICE 1 I, Mary Cummins, hereby certify that a TRUE COPY of the above MOTION FOR 2 TELEPHONIC HEARING was served on the Plaintiffs' Attorney of record by FAX and by FIRST CLASS MAIL at 3 Randy Turner Turner & McKenzie 1 1800 N. Norwood Dr # 100 Hurst, Texas 76054 5 Fax: 817-268-1563 this 12th Day of December, 2011 7 Mary/Cummins, Defendant Pro se 8 645 W 9th St. #110-140 Los Angeles, CA 90015-1640 9 Phone 310-877-4770 Email: mmmaryinla@aol.com 10 11 12 13 14 1.5 16 17 18 19 20 21 22 23 24 25

Cause No. 352-248169-10

BAT WORLD SANCTUARY and AMANDA LOLLAR,	IN THE DISTRICT COURT TARRANT COUNTY, TEXAS S S S S S S S S S S S S	
Plaintiffs,	§ § TARRANT COUNTY, TEXAS	
vs.	TARRANT COUNTY, TEXAS	
MARY CUMMINS,	9 9	
Defendant Pro se	§ 352nd JUDICIAL DISTRICT	
<u>FIAT</u>		
Defendant's MOTION FOR TELEPHO	ONIC HEARING was filed on 12/11/2011.	
Defendant requests that the foregoing be	e set for hearing.	
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	