

MARY CUMMINS
Defendant
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In Pro Per
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SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

INTRODUCTION

Defendant Mary Cummins respectfully moves the Court to deny Plaintiffs' proposed order or in the alternative to modify the order. Attached as Exhibit 1 is absolute proof that Plaintiffs previously requested these exact same documents and were denied. This morning the Texas clerk gave Defendant a copy of the "case status." This proves that Plaintiffs made a motion to compel post judgment discovery January 2, 2013 and were denied by operation of law per Texas Rules of Civil Procedure 329 (b)(c) "In the event an original or amended motion" "is not determined by written order signed within seventy-five days," "it shall be considered overruled by operation

1 of law on expiration of that period.” September 4, 2013 Plaintiffs sent a letter to the
2 court asking them to set the matter for hearing. The Court did not reply.

3 Also attached as Exhibit 2 is absolute proof that Plaintiffs posted Defendant’s ex-
4 attorney’s financial records on the Internet and they are still there to this very day¹. The
5 URL is now included in the printout of the check. The order as it stands would release
6 private confidential financial records of others. Plaintiffs is positive that Plaintiffs will
7 post these confidential records on the Internet just as Plaintiffs previously did which
8 would open up third parties to theft. Defendant believes this subpoena would be used
9 for ulterior motives such as harassment of Defendant, Defendant’s family, friends and
10 clients. This subpoena is unreasonable and oppressive, including unreasonable
11 violations of the right of privacy of Defendant, her family, friends and unrelated third
12 parties.

13 The order as written is overly broad in that there is no date range for the records.
14 This could be 20 years of bank statements which would not lead to anything
15 discoverable as it would be irrelevant based on time.

16 Plaintiffs stated they were only interested in money going in to the account.
17 Therefore they should only receive the records for deposits and not expenditures. If
18 Plaintiffs receive the statements in the order as it is currently written irreparable harm
19 will come to Defendant and unrelated third parties.

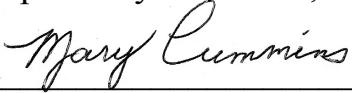
20 **PRAYER**

21 Defendant respectfully requests that this Court deny Plaintiffs’ court order as
22 these records were previously requested and denied. In the alternative Defendant
23 requests that the order be modified to not include records of people, entities other than
24 Defendant, the date range of records be limited to the past 12 months, the records only
25 include money deposited into the account and not expenditures and the records,
26 contents thereof may not be shared publicly or posted on the Internet.

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28 ¹ <http://www.batworld.org/wp-content/uploads/2011/09/Bat-World-chk-2625-09-09-11.pdf>

1 Such other relief as the Court may deem just and proper.

2 Respectfully submitted,

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5 Mary Cummins, Defendant
6 Dated: June 2, 2014
7 645 W. 9th St. #110-140
8 Los Angeles, CA 90015
9 In Pro Per

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