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FILED
Superior Court of California
County of Los Angeles

APR 06 2016

Sherri R. Carter, Executive Officer/Clerk
By Cristina Grijalva Deputy
Cristina Grijalva

5 Attorneys for Plaintiff AMANDA LOLLAR, an individual
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA,**
9 **FOR THE COUNTY OF LOS ANGELES, CENTRAL DISTRICT**
10

11 BAT WORLD SANCTUARY, and AMANDA
12 LOLLAR, an individual

13 Plaintiff,

14 vs.

15 MARY CUMMINS, an individual,
16

17 Defendant.
18
19

Case No.: BS140207

*[Assigned for all purposes to the Honorable
Robert Hess, Dept. "24"]*

**OPPOSITION OF PLAINTIFF AMANDA
LOLLAR TO MOTION TO QUASH,
MODIFY SUBPOENA, PROTECTIVE
ORDER OF DEFENDANT MARY
CUMMINS**

Hearing Date: April 15, 2016
Time: 8:30 a.m.
Dept: "24"

20 **MEMORANDUM OF POINTS AND AUTHORITIES**

21 **I. INTRODUCTION**

22 This action arises out of a Texas judgment for, *inter alia*, defamation against Defendant
23 MARY CUMMINS, an individual ("Defendant CUMMINS,") and in favor of Plaintiff AMANDA
24 LOLLAR, an individual ("Plaintiff LOLLAR,") in the principal sum of Six Million and No/100
25 Dollars (\$6,000,000.00) which was entered in in the District Court of Tarrant County, Texas on
26 August 27, 2012 (hereinafter referred to as the "Defamation Judgment.") Plaintiff LOLLAR recorded
27 an abstract of judgment with respect to the Defamation Judgment in the State of California, County of
28 Los Angeles, on April 23, 2013, for the purposes of seeking to enforce the Judgment against Defendant

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1 CUMMINS' assets in this County. However, in a flagrant and transparent attempt to impede Plaintiff
2 LOLLAR's collection efforts, Defendant CUMMINS has repeatedly and maliciously filed entirely
3 frivolous motions, including motions to quash subpoenas issued as to her financial institutions or
4 suspected financial institutions, filed motions to disqualify multiple judicial officers, motions for
5 "contempt of court," motions for reconsideration, and motions to vacate judgment. All such motions
6 have been summarily denied by the court; with many judicial officers commenting that her motions
7 were "groundless," "filed in bad faith" and made for the "purposes of harassment." (See, e.g., **Exhibit**
8 **A,** Transcript on Plaintiff LOLLAR's motion for sanctions concerning Defendant CUMMINS'
9 motion to recuse, District court of Texas, Tarrant County, August 17, 2012.)

10 Despite the fact that Defendant has, already, been sanctioned for her repeated filing of frivolous
11 and improper motions, Defendant CUMMINS persists in her actions, in an obvious attempt to prevent
12 Plaintiff LOLLAR from executing upon the Defamation Judgment. In fact, Defendant CUMMINS
13 filed a virtually identical motion to "Quash, Modify Subpoena, Protective Order" in this court on
14 February 18, 2014, which motion was denied by this court on May 23, 2014. A true and correct copy
15 of the order on Defendant CUMMINS' Motion to Quash, Modify Subpoena, Protective Order" is
16 attached hereto as **Exhibit "B,"** and incorporated herein by this reference as though fully set forth.
17 The only substantive difference between Defendant's previous motion to quash, and this current
18 motion, is the specific banking institution subpoenaed: here, records from First Bank are being sought
19 whereas Defendant's previous motion to quash concerned records subpoenaed from One West Bank.
20 Defendant CUMMINS is well aware that this very issue has already been litigated, as evidenced by the
21 fact that her "points and authorities" is, quite literally, "cut and pasted" in large portion from her
22 previous motion to quash. Defendant CUMMINS Motion to Quash is entirely frivolous and
23 unmeritorious, and brought for the sole purpose of harassment, to increase the costs of litigation for
24 Plaintiff LOLLAR, and to impede Plaintiff's collection efforts. Such conduct is sanctionable under
25 both California Code of Civil Procedure § 2023.030, and California Code of Civil Procedure Section
26 128.5.

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1 **II. DEFENDANT'S MOTION TO QUASH SHOULD BE DENIED**

2 Defendant CUMMINS makes three (3) arguments as to why the subpoena issued by Plaintiff
3 LOLLAR to First Bank should be quashed – the subpoena seeks records which are irrelevant, the
4 subpoena is over-broad, and the documents sought are protected from disclosure by privilege. Each of
5 these arguments was previously raised, and rejected, in connection with Defendant CUMMINS’
6 previous Motion to Quash filed in connection with Plaintiff’s subpoena for bank statements from One
7 West Bank, which motion to quash was denied by this court on May 23, 2016. (See **Exhibit “B.”**)
8 Such arguments are equally unavailing in this most recent iteration of Defendant CUMMINS’ motion
9 to quash. The bank records Plaintiff seeks are highly relevant to Plaintiff’s collection efforts as to the
10 Defamation Judgment, and are highly likely to provide information concerning Defendant CUMMINS
11 assets, and are thus not “irrelevant” to this action. Neither is the subpoena overly broad, as the
12 subpoena is limited to bank statements which relate to accounts held for Defendant CUMMINS, the
13 judgment debtor here. Furthermore, Defendants bank statements are not protected from disclosure by
14 any privilege. Accordingly, Defendant CUMMINS’ Motion to Quash should be denied, in its entirety.

15 **A. The Documents Sought By Way of This Subpoena Are Relevant to the Subject**
16 **Matter of the Action**

17 For discovery purposes, information should be regarded as “relevant to the subject matter” if it
18 might reasonably assist a party in *evaluating* the case, *preparing* for trial, or facilitating *settlement*
19 thereof. (*Gonzalez v. Sup. Ct.* 33 CA4th 1539, 1546, 39 CR2D 896, 901 (1995); *Lipton v. Sup. Ct.* 48
20 CA4TH 1599, 1611, 56 CR2d 341, 347 (1995); *Stewart v. Colonial W. Agency, Inc.*, 87 Cal. App. 4th
21 1006, 105 Cal. Rptr. 2d 115 (2001).) The “relevant to the subject matter” standard must be broadly
22 applied in accordance with the liberal policies underlying the discovery procedures. (*Pac. Tel. & Tel.*
23 *Co. v. Superior Court*, 2 Cal. 3d 161, 173, 465 P.2d 854, 862-63 (1970). Accordingly, the question of
24 relevance should generally be resolved in favor of permitting discovery. *Chapin v. Superior Court* 239
25 Cal.App.2d 851, 855—859 (1966).)

26 Here, Plaintiff LOLLAR’s subpoena to First Bank seeks the statements of any accounts held on
27 behalf of Defendant CUMMINS. Such records are likely to aid Plaintiff LOLLAR in executing upon
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1 the Defamation Judgment, in that they will assist Plaintiff LOLLAR in determining the location and
2 amount of Defendant CUMMINS' assets.

3 **B. Plaintiff's Subpoena Is Not Overly Broad**

4 Plaintiff LOLLAR's subpoena seeks records to establish Defendant CUMMINS' assets, for the
5 purpose of executing the Defamation Judgment. Contrary to Defendant CUMMINS' assertions of
6 over-breadth, the subpoena at issue is narrowly tailored, and requests only "bank statements" for
7 accounts held "on behalf of [Defendant CUMMINS.]" Accordingly, the subpoena is limited to seek
8 only those documents which would establish Defendant CUMMINS' assets at the bank. The records
9 associated with those account(s), if any, are relevant and necessary to establish Defendant CUMMINS'
10 current assets, and provide Plaintiff information in connection with her efforts to execute upon the
11 Defamation Judgment.

12 Defendant CUMMINS' self-serving, unsubstantiated assertions that she has "no assets" or that
13 there are no relevant records at this particular bank, even if true, does not render the subpoena over-
14 broad, or irrelevant to this action. Moreover, Plaintiff LOLLAR has reason to believe that such
15 assertions are, in fact, false, as Plaintiff has already discovered bank accounts of Defendant at other
16 banks, which she has attempted to conceal, and which Plaintiff has subsequently levied for the
17 purposes of partially satisfying the Defamation Judgment. Accordingly, obtaining the bank statements
18 relating to Defendants' accounts from First Bank is critical to Plaintiff's ability to discover Defendant
19 CUMMINS' true assets.

20 **C. The Financial Records Sought By Way of This Subpoena Are Not Protected By**
21 **Privilege**

22 Privacy protections are qualified; even very private information is subject to disclosure where it
23 is directly relevant to the action, and essential to a fair determination thereof. (*Alch v. Sup.Ct. (Time*
24 *Warner Entertainment Co.)* (2008) 165 Cal.App.4th 1412, 1431-1432; *Schnabel v. Superior*
25 *Court* (1993) 5 Cal.4th 704, 714; Cal. Prac. Guide Civ. Pro. Before Trial Ch. 8C-5.) Here,
26 Defendants' financial records at First Bank are directly relevant to Plaintiff's enforcement efforts as to
27 the Defamation Judgment, and the production of such records is essential to Plaintiff's execution
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1 thereon. Such records also are directly relevant to the issue of whether Defendant CUMMINS is, as
2 she asserts, without a job, without assets, and entirely “judgment proof.” Without obtaining
3 Defendants’ financial records, Plaintiff will have no ability to enforce the Defamation Judgment, and
4 will have no ability to determine whether Defendant CUMMINS has assets which may be used to
5 satisfy the same. Consequently, any applicable privacy objections are outweighed by the importance
6 and relevancy of the information sought.

7 The cases cited by Defendant in support of her argument that her bank records are protected by
8 privacy considerations are the same as previously cited by her in her unsuccessful February 18, 2014
9 Motion to Quash Subpoena. As previously discussed in the context of Defendant’s previously Motion
10 to Quash, such cases, *Britt v. Superior Court* (1978) 20 Cal.3d 844, and *Tylo v. Superior Court* (1997)
11 55 Cal.App.4th 1379, are inapposite, and are inapplicable in this case. *Britt v. Superior Court* involves
12 the ability to obtain discovery as to membership in local private political organizations, and the
13 physician-patient and psychologist-patient privileges. Neither topic is at issue here, and thus the
14 holding of that case is not relevant to this action. *Tylo v. Superior Court* is likewise inapplicable. That
15 case involved questions regarding the health of Plaintiff’s marital relationship, and issues regarding her
16 personal health. It has no bearing on the issue of the disclosure of banking records in a post-judgment,
17 enforcement context. Accordingly, Defendant has not presented any applicable legal support for her
18 assertion that the bank records sought by way of this subpoena are protected under any privilege.
19 Moreover, and in the event such records *are* deemed protected information, Plaintiff LOLLAR has
20 established that such records are directly relevant to the enforcement of the Defamation Judgment and
21 essential to Plaintiff’s ability to execute thereon, and thus, such privacy protections must yield in light
22 of the critical importance of such information in the context of this action.

23 **D. Plaintiff Has No Ulterior Motives**

24 The majority of Defendant’s Motion to Quash is comprised of wild accusations against
25 Plaintiff LOLLAR, which are made without any support or corroborating evidence. Such claims are
26 false, and the court should disregard such self-serving contentions based on the lack of credible
27 evidence, and the fact that they are irrelevant to the matters at hand. The subpoena at issue here seeks
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1 account statements for accounts held on behalf of Defendant CUMMINS at First Bank for the purpose
2 of enforcing the Defamation Judgment obtained against her. Such records are directly relevant to
3 determine the location and sum of Defendant CUMMINS' assets, and relevant to her claims that she
4 does not have any assets to satisfy such judgment. Accordingly, the subpoena at issue here is a proper
5 and valid discovery tool utilized for the purpose of obtaining such records, and is not being effectuated
6 for any improper purpose.

7 **III. DEFENDANT CUMMINS SHOULD BE SANCTIONED FOR FILING THIS**
8 **FRIVOLOUS MOTION TO QUASH, AND FOR PURPOSEFULLY ATTEMPTING TO**
9 **INTERFERE WITH PLAINTIFF'S PROPER COLLECTION EFFORTS**

10 The court may impose a monetary sanction ordering that one engaging in the misuse of the
11 discovery process, or any attorney advising that conduct, or both pay the reasonable expenses,
12 including attorney's fees, incurred by anyone as a result of that conduct. The court shall impose that
13 sanction unless it finds that the one subject to the sanction acted with substantial justification or that
14 other circumstances make the imposition of the sanction unjust. (Cal. Civ. Proc. Code § 2023.030
15 (West).) Misuses of the discovery process include making, without substantial justification, an
16 unmeritorious objection to discovery." (Cal. Civ. Proc. Code § 2023.010 (West).) The Court also has
17 discretion to impose sanctions based on frivolous actions or delaying tactics. (Cal. Civ. Proc. Code §
18 128.5 (West).) Frivolous actions or delay tactics may include the making or opposing of motions.
19 (Cal. Civ. Proc. Code § 128.5 (West).) "Frivolous" actions are defined as those which are brought
20 "completely without merit" or for the sole purpose of harassing another party." (California Code of
21 Civil Procedure Section 128.5(b)(2).) Whether a pleading or motion lacks merit such that sanctions
22 are appropriate is measured by an objective standard; where a "reasonable" person would find the
23 conduct to be without legal merit, or a position without factual support, then the conduct is
24 sanctionable as frivolous and vexatious, regardless of whether the party has a *subjective* belief that his
25 conduct is harassing. (*Finnie v. Town of Tiburon* (1988) 199 Cal.App.3d 1, 12; *Chitsazzadeh v.*
26 *Kramer & Kaslow* (2011) 199 Cal.App.4th 676, 683-684; *see also Weisman v. Bower* (1987) 193

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1 Cal.App.3d 1231, 1236; *Winick Corp. v. County Sanitation Dist. No. 2* (1986) 185 Cal.App.3d 1170,
2 1177; *Bach v. McNelis* (1989) 207 Cal.App.3d 852, 876.)

3 **A. Defendant CUMMINS' Motion To Quash Is Frivolous and Without Merit**

4 In this action, Defendant CUMMINS began by unsuccessfully attempting to re-litigate the
5 issues adjudicated by the Defamation Judgment through a failed motion to vacate the judgment filed
6 on or about May 20, 2013. Subsequently, she filed a motion to quash a subpoena issued by Plaintiff to
7 One West Bank, and, when that motion was denied, brought an *ex parte* application seeking
8 reconsideration of that ruling, which was also denied. (See Exhibit "B.") In blatant disregard for the
9 court's prior rulings, and despite the fact that this subpoena, as to First Bank, is virtually identical to
10 that served on One West Bank which was the basis of Defendant CUMMINS' initial motion to quash,
11 Defendant filed this instant motion to quash, which re-argues the exact same issues already addressed
12 in Defendant CUMMINS' first motion to quash, as to One West Bank, and already decided against
13 her. In fact, Defendants' "legal argument" is largely "cut and pasted" from her previous papers,
14 despite the fact that such arguments were already denied by the court not once, but twice before.
15 Given the fact that Defendant CUMMINS' motion to quash raises no new arguments, and presents the
16 exact same legal argument as to a virtually identical subpoena, no reasonable person would find the
17 motion to have legal merit, and is thus sanctionable as frivolous and vexatious under Section 128.5 of
18 the California Code of Civil Procedure.

19 **B. Defendant CUMMINS Has a Long History of Filing Frivolous Motions For the**
20 **Purpose of Interfering with Plaintiff LOLLAR's Enforcement of the Defamation**
21 **Judgment**

22 In addition to the frivolous actions taken by Defendant CUMMINS in this case, Defendant
23 CUMMINS has a lengthy history of filing unmeritorious motions, improper motions, and untimely
24 motions for the purpose of improperly attempting to re-litigate issues determined against her, and
25 interfering with Plaintiff's right to collect on the Defamation Judgment. This most recent Motion to
26 Quash, which is virtually identical to the previously filed unsuccessful motion to quash filed on
27 Defendant on February 18, 2014, is the latest example in a long line of duplicative, unmeritorious
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1 motions filed by her in an attempt to delay enforcement, unnecessarily increase litigation costs for
2 Plaintiff LOLLAR, and prevent Plaintiff from executing upon the Defamation Judgment. The
3 following is a representative, but in no way exhaustive, list of Defendant CUMMINS' improper
4 filings, which have all been decided against her.

5 In the underlying action Batworld Sanctuary et al. v. Cummins, Tarrant County (Texas)
6 District Court (352nd Jud. Dist) Cause No. 352-248169-10. After the Defamation Judgment was
7 obtained by Plaintiff LOLLAR in this action, Defendant Cummins filed at least two motions for new
8 trial. She filed three motions to recuse the judge as well as a motion to recuse the appellate judge, all
9 of which were denied. When that motion was denied, she filed a motion for reconsideration which
10 was, also, denied. The Orders on Defendant CUMMINS' motions for recusal, and her motion for
11 reconsideration of the denial thereof, are collectively attached hereto as **Exhibit "C,"** and incorporated
12 hereby this reference as though fully set forth. In that action, Defendant CUMMINS also
13 unsuccessfully sought a protective order against Plaintiff LOLLAR, which was also denied by the
14 court. A true and correct copy of the July 21, 2011 order of the court denying Defendant CUMMINS'
15 motion for a protective order is attached hereto as **Exhibit "D,"** and incorporated herein by this
16 reference as though fully set forth. and incorporated herein by this reference as though fully set forth.

17 Defendant CUMMINS also repeatedly failed to comply with her discovery obligations, and
18 Defendant LOLLAR was subsequently sanctioned on multiple occasions. True and correct
19 representative examples of two (2) occasions in which Defendant CUMMINS was sanctioned for
20 failing to comply with her discovery obligations, or with court orders, are collectively attached hereto
21 as **Exhibit "E,"** and incorporated herein by this reference as though fully set forth.

22 In the action Cummins v. Amanda Lollar, Los Angeles County Superior Court Case No.
23 BS143169, Defendant CUMMINS sought a temporary restraining order against Plaintiff LOLLAR.
24 Such application was denied on July 1, 2013, and the Court sanctioned Cummins \$6,350 for
25 prosecuting a baseless application. A true and correct copy of the minute order on Defendant
26 CUMMINS' Application for a Temporary Restraining Order is attached hereto as **Exhibit "F,"** and
27 incorporated herein by this reference as though fully set forth. Cummins thereafter filed a groundless
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1 Motion for Reconsideration and "Amended Motion for Reconsideration" in connection with such
2 order, which was also denied on the basis that Defendant CUMMINS failed to present any new or
3 additional facts. A true and correct copy of the docket of that action is attached hereto as **Exhibit "G,"**
4 and incorporated herein by this reference as though fully set forth. Defendant CUMMINS later filed
5 an affidavit of prejudice against Judge Goodson, who denied Defendant's Application for a Temporary
6 Restraining Order, which was struck on the grounds of untimeliness. Unperturbed, Defendant
7 CUMMINS filed a statement of disqualification, alleging the "extreme prejudice and bias" of Judge
8 Goodson. On September 27, 2013, the court also struck the statement of disqualification. Defendant
9 CUMMINS then filed an appeal of the order denying her application for a temporary restraining order,
10 which appeal was ultimately denied. (*See Exhibit "G."*)

11 Such conduct represents a fraction of the repeated actions of Defendant CUMMINS in filing
12 unmeritorious and improper motions for the purpose of harassing Plaintiff LOLLAR, increasing the
13 costs of litigation, and preventing the enforcement of the Defamation Judgment. Such motions,
14 collectively and individually, were objectively completely without merit, especially given the fact that
15 Defendant CUMMINS repeatedly brought the same or similar motions on a repeated basis, despite the
16 fact that no new facts were presented which would support reconsideration of the motion.

17 Accordingly, Plaintiff LOLLAR respectfully requests that Defendant CUMMINS be sanctioned for
18 bringing this frivolous motion, without any legal basis, and despite the fact that the Court has already
19 considered, and denied, the arguments raised herein. (*See California Code of Civil Procedure Section*

20 128.5)

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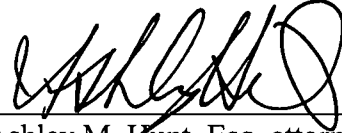
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1 **IV. CONCLUSION**

2 For the foregoing reasons, Plaintiff LOLLAR respectfully requests that Defendant CUMMINS'
3 motion to quash be denied, and further requests that Defendant CUMMINS be sanctioned for filing
4 this frivolous motion, for the apparent purpose of forcing Plaintiff to incur unnecessary attorneys' fees
5 and costs, and to interfere with Plaintiff LOLLAR's collection of the Defamation Judgment.

6 Dated: April 4, 2016

Christian S. Molnar Law Corporation

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Ashley M. Hunt, Esq. attorneys for
9 Plaintiff AMANDA LOLLAR, an
10 individual

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DECLARATION OF ASHLEY M. HUNT, ESQ.

I, Ashley M. Hunt, declare:

1. I am an associate attorney employed by the Christian S. Molnar Law Corporation, counsel for Plaintiff AMANDA LOLLAR, an individual ("Plaintiff LOLLAR.") I have personal knowledge of the matters set forth in this Declaration and, if called as a witness, I could and would testify competently as to the matters stated below.

2. I am making this Declaration in support of Plaintiff LOLLAR's Opposition to Defendant CUMMINS' Motion to Quash, MODIFY SUBPOENA, PROTECTIVE ORDER.

3. Attached hereto as **Exhibit "A"** is a true and correct excerpt of the transcript on Plaintiff LOLLAR's motion for sanctions concerning Defendant CUMMINS' motion to recuse, filed in the District court of Texas, Tarrant County, August 17, 2012.

4. A true and correct copy of the order on Defendant CUMMINS' Motion to Quash, Modify Subpoena, Protective Order" is attached hereto as **Exhibit "B."**

5. The Orders on Defendant CUMMINS' motions for recusal, and her motion for reconsideration of the denial thereof, are collectively attached hereto as **Exhibit "C."**

6. A true and correct copy of the July 21, 2011 order of the court denying Defendant CUMMINS' motion for a protective order is attached hereto as **Exhibit "D."**

7. Collectively attached hereto as **Exhibit "E,"** are true and correct representative examples of two (2) occasions in which Defendant CUMMINS was sanctioned for failing to comply with her discovery obligations, or with court orders.

8. A true and correct copy of the minute order on Defendant CUMMINS' Application for a Temporary Restraining Order is attached hereto as **Exhibit "F,"** and incorporated herein by this reference as though fully set forth.

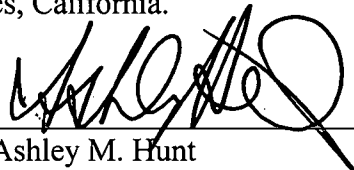
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1 9. A true and correct copy of the Court's docket in Cummins v. Amanda Lollar, *Los*
2 *Angeles County Superior Court Case No. BS143169*, is attached hereto as **Exhibit "G."**

3 I declare under penalty of perjury of the laws of the State of California that the foregoing is true
4 and correct.

5 Executed on this 4th day of April, 2016, at Los Angeles, California.

6 
7 _____
8 Ashley M. Hunt

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EXHIBIT “A”

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EXCERPT OF REPORTER'S RECORD

VOLUME 1 OF 1 VOLUMES

TRIAL COURT CAUSE NO. 352-248169-10

COURT OF APPEALS CAUSE NO. 02-12-00285-CV

BAT WORLD SANCTUARY, ET AL)	IN THE 352ND JUDICIAL
)	
vs.)	DISTRICT COURT OF TEXAS
)	
MARY CUMMINS)	IN AND FOR TARRANT COUNTY

EXCERPTS OF PROCEEDINGS

August 17, 2012

On the 12th day of August, 2012, the following proceedings came on to be heard in the above-titled and numbered cause before the Honorable Jeff Walker, Judge Presiding, held in Fort Worth, Texas, reported by machine shorthand utilizing computer-aided transcription.

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APPEARANCES

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Pro Se

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P R O C E E D I N G S

(Fifth Amendment Right Invoked)

* * *

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4 **THE COURT:** All right. Mr. Turner, do you have
5 evidence to present?

6 **MR. TURNER:** I do want to call Ms. Cummins,
7 briefly, Your Honor, to the witness stand.

8 **THE COURT:** This is an unusual situation,
9 Ms. Cummins. Hold on just a second. You don't have to go
10 back, stay where you are.

11 This sanction motion under Rule 13 has as
12 potential punishment those set forth in Rule 215 of the Rules
13 of Civil Procedure, which include contempt. That is a quasi
14 criminal matter. As such, you're entitled to your
15 Constitutional rights under the Fifth Amendment and otherwise.
16 Your right to remain silent. If you put on any evidence you
17 waive that right.

18 Do you understand what I'm saying?

19 **MS. CUMMINS:** Yes. But if this is a -- could
20 possibly be criminal contempt, wouldn't I then be allowed an
21 attorney?

22 **THE COURT:** That's -- you may have an attorney.
23 This is not a criminal case. I cannot assign you one, but you
24 have the right to have an attorney if you want to get one. We
25 can reschedule this hearing until you have a lawyer.

1 (Rulings by the Court)

2 THE COURT: Mr. Turner, I'm reading Rule 13, and
3 the thing that I think you have a problem with here is -- the
4 opening sentence of that rule says: The signatures of
5 attorneys or parties constitute a certificate by them that
6 they have read the pleadings, motion or other paper that to
7 the best of their knowledge, information and belief formed,
8 after reasonable inquiry, the instrument is not groundless and
9 brought in bad faith or groundless and brought for purposes of
10 harassment. It's that word "belief" that is, I think, the
11 problem that you have.

12 From what I've heard from Ms. Cummins, she
13 stated it was her belief and she stated the basis for her
14 belief. Your motion for Rule 13 sanctions is denied.

15 (Brief pause.)

16 THE COURT: I'm now looking at the sanctions
17 rule contained in Rule 18a, which provides for monetary
18 sanctions in the form of reasonable attorney's fees and
19 expenses and do not include any of the other sanctions under
20 Rule 215.

21 Rule 18a -- and I'm cutting down to the part
22 that I want to touch on -- after notice of hearing the Judge
23 who hears the motion may order the party or attorney who filed
24 the motion or both to pay a reasonable attorney's fees and
25 expenses incurred by other parties if the Judge determines

1 that the motion was, one, groundless and filed in bad faith
2 or, for the purposes of harassment; or, two, clearly brought
3 for unnecessary -- clearly brought for unnecessary delay and
4 without sufficient cause.

5 Ms. Cummins, the grounds that you have stated
6 and you put on evidence of raises a question of how groundless
7 must it be. I have read all of your motions, your
8 responses -- both parties -- your attachments, your exhibits.
9 It seemed pretty clear to me that there was an awful lot of
10 ranker on your part about the process, about the good 'ol
11 boys, about your feeling of ill treatment at the hands of the
12 judiciary in the State of Texas that you put out there for the
13 whole world. And now I've heard the evidence, which, quite
14 frankly, don't substantiate any of those statements. Makes
15 one wonder if you did it for purposes of harassment.

16 You know, in one of your e-mails your -- I guess
17 it's a blog, I don't do that sort of thing -- that you sent
18 out under some kind of byline that you have, you talked about
19 this nice female judge, Bonnie Sudderth, and that her
20 supervisor swapped her out of the case for an old white guy.

21 **MS. CUMMINS:** I don't remember saying that
22 specifically.

23 **THE COURT:** Well, for Judge Brigham.

24 Where did you get the idea that I swap one for
25 Judge Sudderth without her knowledge or consent?

1 recuse right then and there at the beginning of the trial.

2 **THE COURT:** Well, Ms. Cummins, I'm going to
3 sanction you under Rule 18a, Subparagraph H. The sanction
4 is -- I'll make a finding that your motion to recuse was
5 groundless and filed in bad faith. It only provides for
6 attorney's fees and expenses, and I'm going to set that at
7 \$500. You'll have 30 days in which to pay that to Mr. Turner.

8 And I will have a prepared order in the mail to
9 you soon as I have it written up, signed and placed in the
10 file.

11 That concludes this hearing.

12 **MR. TURNER:** Thank you, Your Honor.

13 *(Proceedings adjourned)*

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1 STATE OF TEXAS

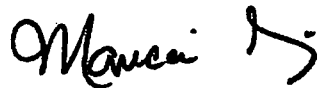
2 COUNTY OF TARRANT

3 I, Monica J. Willenburg, Official Court Reporter
4 in and for the 352nd District Court of Texas in and for
5 Tarrant County, do hereby certify that the above and foregoing
6 contains a true and correct transcription of an excerpt of
7 portions of evidence and other proceedings requested in
8 writing by counsel for the parties to be included in this
9 volume of the Reporter's Record in the above-styled and
10 numbered cause, all of which occurred in open court or in
11 chambers and were reported by me.

12 I further certify that this Reporter's Record of
13 the proceedings truly and correctly reflects the exhibits, if
14 any, offered by the respective parties, if requested.

15 I further certify that the total cost for the
16 preparation of this Reporter's Record is \$ 60.00
17 and was paid/will be paid by PLAINTIFF.

18 WITNESS MY OFFICIAL HAND, on this the 10th of
19 September, 2012.

20 

21
22 Monica J. Willenburg, CSR, RPR
23 Texas CSR No. 3386, Exp: 12/31/12
24 Official Court Reporter
25 352nd District Court
401 W. Belknap, 8th Floor
Fort Worth, Texas 76196
Telephone: (817)884-2732
email: mwillenburg@tarrantcounty.com

04/08/2016

EXHIBIT “B”

04/08/2016

1 Law Office of David C. Watts
1260 Lake Blvd. #218
2 Davis, CA 95616
3 TEL (530) 400-1782

FILED
Superior Court of California
County of Los Angeles

JUN 19 2014

4 David C. Watts (SBN 215850)
Attorney for Plaintiffs

Sherri R. Carter, Executive Officer/Clerk
By Geoffrey Charles Deputy
Geoffrey Charles

6 SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

8 **BAT WORLD SANCTUARY &**
9 **AMANDA LOLLAR,**
10 **Plaintiffs/Judgment**
11 **Creditor**
12 **v.**
13 **MARY CUMMINS**
14 **Defendant/Judgment**
15 **Debtor**

Case No: BS140207

[PROPOSED] ORDER
MOTION TO QUASH, MODIFY
SUBPOENA, PROTECTIVE ORDER
CCP 1987.1

Date: May 23, 2014
Time: 8:30 AM
Dept: 24
Judge: Robert Hess

JUDGMENT ENTERED IN
CALIFORNIA November 9, 2012

17 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD;**

18 PLEASE TAKE NOTICE that on May 23, 2014, in Department 24 of the
19 Superior Court of California for the County of Los Angeles, before the Honorable
20 Judge Robert Hess, DEFENDANT'S MOTION TO QUASH, MODIFY
21 SUBPOENA, PROTECTIVE ORDER CCP 1987.1 was heard.

22 Bat World Sanctuary and Amanda Lollar appeared by and through their
23 attorney of record David C. Watts via CourtCall. Moving party Mary Cummins
24 appeared in court on her own behalf.

25 After considering, inter alia, the moving papers and opposing papers
26 submitted in connection with this motion and the oral argument presented, this Court
27 finds that DEFENDANT'S MOTION TO QUASH, MODIFY SUBPOENA,
28 PROTECTIVE ORDER CCP 1987.1 is DENIED.

07/23/2014

04/08/2016

1 PLEASE TAKE FURTHER NOTICE that on May 30, 2014 in Department 24
2 of the Superior Court of California for the County of Los Angeles, before the
3 Honorable Judge Robert Hess, Defendant's motion titled, DEFENDANT'S
4 EMERGENCY EX PARTE MOTION TO RECONSIDER DEFENDANT'S
5 MOTION TO QUASH SUBPOENA; PROTECTIVE ORDER; OBJECTION TO
6 COURT ORDER was heard.

7 Bat World Sanctuary and Amanda Lollar again appeared by and through their
8 attorney of record David C. Watts via CourtCall. Moving party Mary Cummins
9 again appeared in court on her own behalf.

10 After considering, inter alia, the moving papers and opposing papers
11 submitted in connection with this motion and the oral argument presented, this Court
12 finds that DEFENDANT'S EMERGENCY EX PARTE MOTION TO
13 RECONSIDER DEFENDANT'S MOTION TO QUASH SUBPOENA;
14 PROTECTIVE ORDER; OBJECTION TO COURT ORDER is also DENIED.

15 Accordingly, this Court hereby orders as follows:

16 (1) Onewest bank is hereby ordered to deliver the requested documents as set
17 forth in the Deposition Subpoena for Production of Business Records
18 dated January 29, 2014, within two (2) weeks of the delivery of this Order
19 to Onewest Bank. Said Subpoena is attached hereto as Exhibit "1".

20 (2) This Order shall be effective immediately upon actual or constructive
21 notice thereof to all parties.

22 So Ordered

23
24 DATED: June 18, 2014

25
26 By: 

27 Robert Hess

28 JUDGE OF THE SUPERIOR COURT

07/23/2014

04/08/2016

04/08/2016

EXHIBIT C

EXHIBIT “C”

04/08/2016

CAUSE NO. 352-248169-10

BAT WORLD SANCTUARY

Vs

MARY CUMMINS

§
§
§
§
§

IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

352nd JUDICIAL DISTRICT

ORDER DENYING MOTION TO RECUSE


On the 11th day of October, 2012, came on for consideration the Motion to Recuse the Honorable William Brigham filed this date by Movant Mary Cummins. Without the necessity of a formal hearing it is found that:

A) The Motion does not comply with T.R.C.P. Rule 18a(a)(3), in that it complains about the Judge's rulings without showing that a bias or prejudice motivated the ruling; and/or

B) The Motion failed to set out "Facts" in detail and particularity, that would be admissible in evidence and would be sufficient to justify recusal.

Therefore, it is found that the Motion to Recuse should be, and it is hereby, denied.

Signed this 12th day of October, 2012.


Jeff Walker, Presiding Judge
8th Administrative Judicial Region

MAILED COPY TO ALL ATTORNEYS
AND PRO SE PARTIES OF RECORD
10-12-12 LAA

Court's Minutes 2421AA
Transaction #

04/08/016

Before the Presiding Judge
Of the Eighth Administrative Judicial Region of Texas

CAUSE NO 352-248189-10

BAT WORLD SANCTURARY, ETAL

VS

MARY CUMMINS

IN THE DISTRICT COURT

352ND JUDICIAL DISTRICT

TARRANT COUNTY, TEXAS

ORDER DENYING MOTION TO RECUSE

On the 2nd day of November, 2012, came on to be heard the Motion to Recuse the Honorable William Brigham, filed in the above causes. The Court, having considered the motion, the evidence, and the arguments presented, concluded that the motion should be, and it is hereby, DENIED.

SIGNED this 6th day of November, 2012.


JEFF WALKER, Presiding Judge

MAILED COPY TO ALL ATTORNEYS
AND PRO SE PARTIES OF RECORD
11-7-12

Court's Minutes 2734A
Transaction #

04/08/2016

Before the Presiding Judge
Of the Eighth Administrative Judicial Region of Texas

CAUSE NO.352-248169-10

BAT WORLD SANCTURARY AND
AMANDA LOLLAR, Plaintiffs

IN THE DISTRICT COURT

Vs

OF TARRANT COUNTYI, TEXAS

MARY CUMMINS, Defendant Pro Se

352ND JUDICIAL DISTRICT

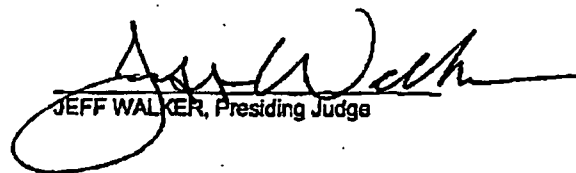
ORDER DENYING MOTION TO RECUSE

On the 17th day of August, 2012, came on for hearing Defendant's Motion to Recuse the Honorable William Brigham. Movant appeared pro se. Plaintiff Bat World Sanctuary et al appeared through their attorney.

Having considered the evidence and arguments presented, it is found that the Motion should be, and it is hereby, DENIED.

Further, it is found that Rule 18a(h)(1) sanctions are justified by the evidence and arguments presented, and it is, therefore, ordered that Movant Mary Cummins pay to Attorney Randall Turner, within 30 days of this order, the sum of \$500.00 as reasonable attorney fees and expenses.

SIGNED this 20th day of August, 2012.


JEFF WALKER, Presiding Judge

MAILED COPY TO ALL ATTORNEYS
AND PRO SE PARTIES OF RECORD

8/21/12

JOB

Court's Minutes
Transaction #

2071AA

04/08/2016

Before the Presiding Judge
Of the Eighth Administrative Judicial Region of Texas

CAUSE NO.352-248169-10

BAT WORLD SANCTURARY AND
AMANDA LOLLAR, Plaintiffs

IN THE DISTRICT COURT

Vs

OF TARRANT COUNTYI, TEXAS

MARY CUMMINS, Defendant Pro Se

352ND JUDICIAL DISTRICT

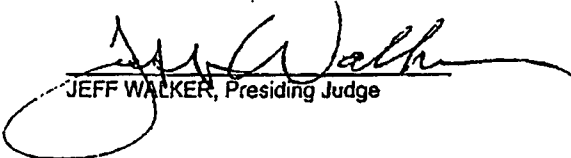
ORDER DENYING MOTION TO RECONSIDER

On the 21st day of August, 2012, came on for the consideration Defendant's Verified Motion to Reconsider Motion to Recuse Judge and Rule 18 Sanctions. Without the necessity of a hearing, and based solely on Defendant's Motion to Reconsider, it is found that:

- a) the Motion to Reconsider fails to state facts that, if proven by legally admissible evidence, would be sufficient to justify recusal.
- b) in large part the Motion to Reconsider is merely a restatement of Movant's original Motion to Recuse and fails to state any new grounds that would support recusal.
- c) the Motion to Reconsider, as well as the Original Motion to Recuse, are not timely made. Movant has delayed making any objection to the Honorable William Brigham until after he ruled in her case, even though she possessed knowledge, during the trial, of those matters to which she now complains.

Therefore, it is found that the Motion to Reconsider Motion to Recuse Judge and Rule 18a Sanctions should be, and it is hereby, DENIED.

SIGNED this 21st day of August, 2012.


JEFF WALKER, Presiding Judge

04/08/2016
MAILED COPY TO ALL ATTORNEYS
AND PRO SE PARTIES OF RECORD
8-22-12 AAA

Court's Minutes
Transaction # 210 AAA

04/08/2016

EXHIBIT D

EXHIBIT “D”

04/08/2016

CAUSE NO. 352-248169-10

BAT WORLD SANCTUARY and
AMANDA LOLLAR,
Plaintiffs

v.

MARY CUMMINS,
Defendant

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IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

352nd JUDICIAL DISTRICT

ORDER DENYING DEFENDANT'S MOTION FOR PROTECTIVE ORDER

On July 21, 2011 came on to be heard the motion for protective order filed by the defendant, Mary Cummins. The plaintiff appeared by and through its attorney of record. The defendant appeared and through her attorney of record.

After considering the pleadings and hearing the evidence and arguments the Court finds that it has personal jurisdiction over the defendant and that the defendant's motion to for protective order should be DENIED.

IT IS THEREFORE ORDERED that the motion to protective order filed by the defendant be and the same is hereby DENIED.

SIGNED this 21 day of July, 2011.


JUDGE PRESIDING

04/08/2016

04/08/2016

EXHIBIT “E”

04/08/2016

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 GRANTING PLAINTIFF'S MOTION FOR DISCOVERY SANCTIONS

On the 2nd day of June, 2011 came on to be heard the Motion for Discovery Sanctions filed by the plaintiffs. The plaintiffs appeared by and through their attorney of record. The defendant did not appear.

The Court finds that the motion is well-taken and should be granted.

IT IS THEREFORE ORDERED that Mary Cummins pay to the law firm of Turner & McKenzie, PC attorney's fees in the amount of Five Hundred Dollars (\$500.00).

SIGNED this 15th day of August, 2011.


JUDGE PRESIDING

04/08/2016

CAUSE NO. 352-248169-10

BAT WORLD SANCTUARY and
AMANDA LOLLAR,
Plaintiffs

v.

MARY CUMMINS,
Defendant

§
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IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

352nd JUDICIAL DISTRICT

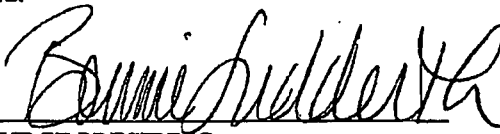
ORDER ON PLAINTIFFS' MOTION FOR CONTEMPT

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 *under the conditions regarding as set forth in the November 28, 2011 order*
SIGNED this 10 day of January, 2012. *circumstances*


JUDGE PRESIDING

04/08/2016

04/08/2016

EXHIBIT “F”

04/08/2016

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

DATE: 07/01/13

DEPT. 75

HONORABLE CAROL BOAS GOODSON

JUDGE

S. CHARLES

DEPUTY CLERK

HONORABLE #2

JUDGE PRO TEM

ELECTRONIC RECORDING MONITOR

M. LEWIS

Deputy Sheriff

NONE

Reporter

8:30 am

BS143169

Plaintiff
Counsel

IN PROPRIA PERSONA

MARY KATHERINE CUMMINS-COBB

Defendant
Counsel

DEAN A. ROCCO

VS

AMANDA LORRAINE LOLLAR

NATURE OF PROCEEDINGS:

harassment
Hearing on Petition for Injunction Prohibiting

The above entitled matter is called for hearing.

The petitioner is sworn.

The court finds that the petition, on its face, does not rise to the level of the issuance of an Injunction.

Oral argument taken from the petitioner.

The Petition For Injunction Prohibiting Harassment is denied.

Counsel for the respondent's motion for attorney fees is granted. The petitioner is ordered to pay the Law offices of Jackson/Lewis, the sum of \$6,350.00, within ninety (90) days.

MINUTES ENTERED 07/01/13 COUNTY CLERK

04/28/2016

Exhibit 1

04/08/2016

EXHIBIT “G”

04/08/2016


[Home](#)
[Online Services](#)

Pay Fines, Search Records...

[Forms & Filings](#)

Forms, Filing Fees...

[Self-Help](#)

Self-Rep. Info, FAQs...

[Divisions](#)

Civil, Criminal, Family...

[Jury](#)

Jury Duty Portal, Q&A...

[General Info](#)

Courthouses, ADA, Local Rules...

ONLINE SERVICES

Case Summary

CASE SUMMARY



Please make a note of the Case Number.

[Click here to access document images for this case.](#)

If this link fails, you may go to the Case Document Images site and search using the case number displayed on this page.

Case Number: BS143169

MARY KATHERINE CUMMINS-COBB VS. AMANDA LORRAINE LOLLAR

Filing Date: 05/24/2013

Case Type: Civil Harassment (General Jurisdiction)

Status: Judgment by Court-Petition Denied 07/01/2013

Future Hearings

None

[Documents Filed](#) | [Proceeding Information](#)

Parties

CUMMINS-COBB MARY KATHERINE - Petitioner

LOLLAR AMANDA LORRAINE - Respondent

ROCCO DEAN A. - Attorney for Respondent

[Case Information](#) | [Party Information](#) | [Proceeding Information](#)

Documents Filed (Filing dates listed in descending order)

06/18/2015 Remittitur (remittitur issued on 6/9/15; sent to dept 75 on 6/19/15)

Filed by Clerk

01/22/2014 Ntc to Prty re fee Clk's Transcript

Filed by Clerk

11/15/2013 Designation of Record on Appeal

Filed by Attorney for Respondent

11/08/2013 Order-Court Fee Waiver

Filed by Clerk

11/07/2013 Designation of Record on Appeal

Filed by Plaintiff/Petitioner

11/07/2013 Request-Waive Court Fees

Filed by Plaintiff/Petitioner

10/01/2013 Ntc to Atty re Notice of Appeal

04/08/2016

Filed by Clerk

10/01/2013 Order-Court Fee Waiver

Filed by Court

09/30/2013 Request-Waive Court Fees

Filed by Plaintiff/Petitioner

09/30/2013 Notice of Appeal

Filed by Plaintiff/Petitioner

09/27/2013 Notice of Ruling

Filed by Respondent

09/26/2013 Response (DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION TO DISQUALIFY AND FOR SANCTIONS)

Filed by Respondent

09/26/2013 Reply to Motion (REPLY TO RESPONDENT'S MOTION TO DEEM PLAINTIFF A VEXATIOUS LITIGANT)

Filed by Respondent

09/26/2013 Request (PETITIONER'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF REPLY TO RESPONDENT'S MOTION TO DEEM PLAINTIFF A VEXATIOUS LITIGANT- DECLARATION OF PETITIONER)

Filed by Petitioner

09/26/2013 Order (striking statement of disqualification)

Filed by Court

09/26/2013 Declaration (REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF REPLY TO RESPONDENT'S MOTION TO DEEM PLAINTIFF A VEXATIOUS LITIGANT AND DECLARATION OF MARY CUMMINS)

Filed by Petitioner

09/20/2013 Affidavit of Prejudice - Cause (stricken by court order)

Filed by Petitioner

09/20/2013 Notice (NOTICE OF NON-OPPOSITION TO AMANDA LOLLAR'S MOTION TO DEEM MARY CUMMINS-COBB A VEXATIOUS LITIGANT)

Filed by Respondent

09/05/2013 Affidavit of Prejudice—Peremptory

Filed by Petitioner

08/15/2013 Brief (AMENDED MOTION TO RECONSIDER ET AL)

Filed by Petitioner

08/05/2013 Opposition Document (opposition to motion for reconsideration)

Filed by Attorney for Respondent

07/16/2013 Motion for Reconsideration

Filed by Petitioner

06/28/2013 Response

Filed by Respondent

06/14/2013 Order (CH116-CONTINUANCE)

Filed by Court

06/13/2013 Response

Filed by Attorney for Respondent

05/24/2013 Order to Show Cause

Filed by Petitioner

05/24/2013 Application for TRO

Filed by Petitioner

Case Information | Party Information | Documents Filed

Proceedings Held (Proceeding dates listed in descending order)

09/27/2013 at 08:30 am In Department 75, Carol Boas Goodson, Presiding
Order-Court - **Denied**

09/27/2013 at 08:30 am In Department 75, Carol Boas Goodson, Presiding
Motion (DECLARE PETITIONER A VEXATIOUS LITIGANT) - **Denied**

09/06/2013 at 01:30 pm In Department 75, Carol Boas Goodson, Presiding
Affidavit of Prejudice (170.6 CCP untimely-stricken) - **Denied**

08/16/2013 at 08:30 am In Department 75, Carol Boas Goodson, Presiding
Motion for Reconsideration - **Denied**

04/08/2016

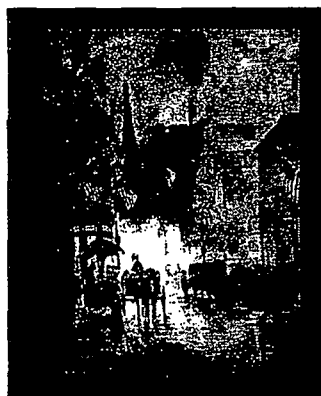
07/01/2013 at 08:30 am in Department 75, Carol Boas Goodson, Presiding
Hrng on Petn Prohibit Harassment (TRO DISSOLVED) - TRO is denied.

06/14/2013 at 08:30 am in Department 75, Carol Boas Goodson, Presiding
Hrng on Petn Prohibit Harassment (TRO IN EFFECT) - Respdt's mo for continuance grantd

Case Information | Party Information | Documents Filed | Proceeding Information



Art Showcased in
Los Angeles Courthouse Jury Rooms



"New York" by Samantha Wel
2008 Honorable Mention



04/08/2016