

BAT WORLD SANCTUARY and
AMANDA LOLLAR,

Plaintiffs,

vs.

MARY CUMMINS,

Defendant Pro se

IN THE DISTRICT COURT

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:

1.

This case is presently set for trial 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.

1 c. Plaintiff and Defendant have not been able to schedule the depositions of vital
2 witnesses, specifically Dr. Tad Jarrett, Kate Rugroden and Jannette Villareal. Plaintiff
3 refuses to give Defendant any deposition dates for Dr. Tad Jarrett or Jannette Villareal
4 even though Defendant has been asking for quite some time.

5 d. Plaintiff did not answer all questions in Plaintiff's November 8, 2011 deposition.
6 Defendant may have to file a motion to compel.

7 e. The Judge has not finalized orders on two outstanding motions, i.e. Plaintiffs'
8 Motion to Amend Injunction, Defendant's Motion to Compel Discovery Documents. The
9 orders are needed in order to prepare for trial.

10 f. Defendant only recently received videos of the depositions of Defendant.
11 Defendant needs time to view the videos and correct the minutes in the transcript.

12 3.

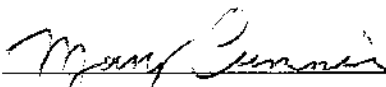
13 This continuance is not sought solely for delay but that justice may be served.

14 WHEREFORE, Defendant respectfully requests that the Court grant this Motion for
15 Continuance of trial. Defendant requests an extension of two months.

16 Respectfully submitted,

17
18 Mary Cummins, Defendant Pro se
19 645 W 9th St, #110-140
20 Los Angeles, CA 90015-1640
21 Phone 310-877-4770
22 Email: mmmaryinla@aol.com

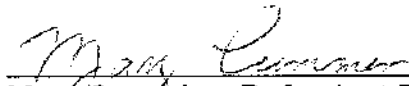
23 By:



24 Mary Cummins, Defendant Pro Se
25

1 **CERTIFICATE OF SERVICE**

2 I, Mary Cummins, hereby certify that a TRUE COPY of the above **MOTION FOR**
3 **CONTINUANCE** was served on the Plaintiffs' Attorney of record by FAX and by FIRST
4 CLASS MAIL at
5 Randy Turner
6 Turner & McKenzie
7 1800 N. Norwood Dr # 100
8 Hurst, Texas 76054
9 Fax: 817-268-1563
10 this 12th Day of December, 2011

11 
12 _____
13 Mary Cummins, Defendant Pro se
14 645 W 9th St, #110-140
15 Los Angeles, CA 90015-1640
16 Phone 310-877-4770
17 Email: mmmaryinla@aol.com

Cause No. 352-248169-10

BAT WORLD SANCTUARY and
AMANDA LOLLAR,

Plaintiffs,

vs.

MARY CUMMINS,

Defendant Pro se

§
§
§
§
§
§
§
§
§
§

IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

352nd JUDICIAL DISTRICT

FIAT

Defendant's MOTION FOR CONTINUANCE was filed on 12/11/2011. Defendant requests that the foregoing be 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

BAT WORLD SANCTUARY and
AMANDA LOLLAR,

Plaintiffs,

vs.

MARY CUMMINS,

Defendant Pro se

§ IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

352nd JUDICIAL DISTRICT

DEFENDANT'S MOTION FOR TELEPHONIC HEARING

TO THE HONORABLE JUDGE OF SAID COURT:

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

1.

The hearing is for Defendant's Motion for Continuance in the above styled cause filed December 12, 2011. Hearing date has not yet been set.

2.

Defendant resides in Los Angeles County, California and their appearance by telephone would be the most expedient method of resolving the issues for all parties involved.

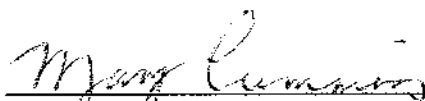
3.

No party in this action will suffer any prejudice if Defendant appears telephonically.

1 WHEREFORE, Defendant respectfully requests that the Court grant this Motion for
2 Telephonic Hearing.

3 Respectfully submitted,

4
5 Mary Cummins, Defendant Pro se
6 645 W 9th St, #110-140
7 Los Angeles, CA 90015-1640
8 Phone 310-877-4770
9 Email: mmmaryinla@aol.com


10
11 By: 
12 _____
13 Mary Cummins, Defendant Pro Se
14
15
16
17
18
19
20
21
22
23
24
25

1 **CERTIFICATE OF SERVICE**

2 I, Mary Cummins, hereby certify that a TRUE COPY of the above **MOTION FOR**
3 **TELEPHONIC HEARING** was served on the Plaintiffs' Attorney of record by FAX and by
4 **FIRST CLASS MAIL** at

5 Randy Turner
6 Turner & McKenzie
7 1800 N. Norwood Dr # 100
8 Hurst, Texas 76054
9 Fax: 817-268-1563

10 this 12th Day of December, 2011

11 
12 _____
13 Mary Cummins, Defendant Pro se
14 645 W 9th St, #110-140
15 Los Angeles, CA 90015-1640
16 Phone 310-877-4770
17 Email: mmmaryinla@aol.com

