

APPEAL 02-12-00285-CV
COURT ORDER

I was sued for defamation and breach of contract. The Judge ordered me to remove these "defamatory" items. None of these items were defamatory. None of these items were breach of contract. I am posting this as part of my appeal. It is not a violation of the court order. It is a copy of the court order with my responses. I was ordered to remove these phrases from a few different pages but not this page which did not exist during my trial.

I was ordered to remove these statements from sites which I control. I reply after each numbered statement with *.

I must remove these phrases from my Bat World lawsuit page.

1. They breed animals in the facility.

*Truth. Appellee stated this in trial and her website. Warden stated that appellee is breeding bats in the facility. I posted her online statements, wardens email in my site.

2. Pretty ironic for this group to certify Bat World Sanctuary when the health department told her to leave town and they had to gut the building and remove her belongings.

*Truth. Health Department told her to "get the bats out of town." I posted that document. Her neighbor stated in writing that the new owner gutted the building. The new owner told the City Manager that they had to remove her items. Lollar admitted in trial that they removed her items. I posted the neighbors email to the city and the city manager's response which shows this.

3. Vet recommended blood and stool tests. Lollar declined. She just wants empirical therapy. If that doesn't work, she wants to euth the dog. She refused treatment. When I was at Bat World June 19, 2010 to June 28, 2010 I saw her use her fingers to pull out one of the dog's teeth, i.e. oral surgery on dogs.

*Truth. I received her veterinary records in discovery. This is from her vet records. I did witness her pull out a dog's tooth. I posted the vet records.

4. The current method she suggests is also inhumane. The bats die of suffocation. She also forgets to mention that the drugs she suggests must be used under the direction of a veterinarian. She doesn't even administer the gas legally, humanely, or safely.

*Truth. I witnesses this. I videotaped this. Bat experts stated in the book "Bats in Captivity" that her method is inhumane and illegal. The label on the Isoflurane

states it must be used with a nebulizer which she does not use. She stated she uses this method in her book. She stated this in her deposition. I posted the Iso label which she sent to the City. I posted the statements from the expert's books. Lollar states this is how she euthanizes bats in her current book.

5. He should not be working for free for someone who commits animal cruelty.

*Truth. Not about Plaintiff but her attorney Randy Turner. Opinion. Lollar committed animal cruelty based on her actions and animal cruelty laws. Texas Veterinary Board told me she was committing animal cruelty.

6. I doubt he'll be speaking about this embarrassing little case where he is actually representing someone who commits animal cruelty and neglect.

*Truth. Not about Plaintiff but her attorney Randy Turner. Opinion. Lollar committed animal cruelty and neglect based on her actions, what I witnessed and animal cruelty laws. Texas Veterinary Board told me she was committing animal cruelty.

7. She took the money that came from the dissolution of Bonnie Bradshaw's group and bought a new silver Honda Eclipse. That money was supposed to go for animals. This is what Lollar does with money that is given to Bat World.

*Truth. She was given apx \$10-\$14K from Bonnie's group. She bought a Honda Eclipse. The money was supposed to go to animals. She stated she received the money and bought the car in deposition. I posted that online.

8. Lollar never even washed her hands before surgery, you can see dirty finger nails in the photos, no surgical garments, no mask, hat, nothing. Night and day.

*Truth. I witnessed this. I have photos and videos of this. I posted the photos and videos. Lollar also told me she has to photoshop the dirt out from under her nails in her photos.

9. Just confirmed that Amanda Lollar of Bat World Sanctuary is illegally obtaining human and animal rabies vaccinations. ...Again, breaking the law. I'm amazed she admitted to having the vaccine and buying it when she is doing it illegally.

*Truth. Lollar is not a doctor, nurse, veterinarian or pharmacist. She cannot have rabies vaccinations. She told me she had them. She showed me the animal rabies vaccinations. She instructed me to give the bats rabies vaccinations which I did. She gave me a receipt for human rabies vaccinations which she bought and had delivered to Bat World. She told me they think she's a doctor when she is not. I posted Novartis' email, her receipt for vaccinations.

10. She does not state that it died from neglect of care. She also chose to euth it instead of treating it as her vet suggested. She'd previously turned down care

which her vet suggested.

*Truth. I received a copy of her vet records which prove this. I posted the vet records.

11. When I was at Bat World she told me the place where she buys her rabies vaccine thinks she's a doctor.

*Truth. She told me this. I also contacted the company and confirmed. I posted the email to/from the company.

12. Earlier in the year the vet noted the dog had major dental issues yet she didn't have the vet treat them. You know how painful it would be to have a mouth full of rotten teeth? That's animal neglect.

*Truth. I have a copy of her vet records which prove this. It would be animal neglect not to care for your pet's teeth. I posted the vet records.

13. BREAKING NEWS!!! Amanda Lollar of Bat World Sanctuary admits in writing that she and Bat World Sanctuary are being forced to leave Mineral Wells because of all the complaints to the City and Health Department.

*Truth. Amanda Lollar sent a letter to the City stating she is leaving because of all the complaints. I posted the letter.

14. The dog's rear claws are super long. There is no way she could stand. ... She has to drag herself on cement.

*Truth. I witnessed this. So did another witness who stated this in trial. I posted a photo of the dog's long claws. I posted the vet records. She admitted that the dog had major hip and knee problems.

15. She tells people to use Isoflurane illegally, inhumanely and unsafely in her book.

*Truth. She stated this in her deposition. She stated this in her book. I posted her quotes.

16. He didn't care that she admitted to illegally having the human rabies vaccination, admitted to using drugs not according to the label or that she "proudly" admitted to performing surgery.

*Truth. I believe I'm talking about her attorney not caring that she was breaking the law. This is not about Plaintiff but her attorney. She did proudly admit to performing surgery in writing and in her deposition. I posted this. She admitted to have the human rabies vaccination and not using drugs according to the label in deposition.

I posted that evidence.

17. In the video Lollar takes tweezers and just pulls out the molars of a conscious bat that is fighting and biting her while it bleeds. Lollar is proud of this and posted this video in her book and online.

*Truth. She took video of this and posted it. I reposted her video. It's also in her book.

18. Pulling molars out of conscious bats is not "cutting_edge" though cutting open conscious bats might fall into that "category." Operating on bats using the drop anesthesia technique or amputating wings instead of pinning them is also not cutting edge but cave man veterinary practice.

*Truth. She took video of herself pulling molars out of conscious bats. She posted that video. I reposted it. I posted photos of her using this anesthesia technique. She admits to using this technique in her book. Bat experts state you should pin wings and not amputate them. Lollar states pinning doesn't work so she amputates. I posted those statements.

19. Lollar is exposing people to rabies by not checking their cards.

*Truth. Lollar didn't check my card or others. That is exposing people to rabies. Randy Turner her attorney admitted he had no shots or card. Then he admitted to going into the bat enclosure. The health dept told Lollar not to let anyone near the bats if they don't have their shots and show their cards. Later Turner lied and said he was not in the cage. Then he posted a photo of himself in the cage touching a bat.

20. Her recent story about the episiotomy at the depo was that, that was not the bat's vagina and uterus being pulled out. It was the "placenta separating." It clearly was not.

*Truth. That is what she said in her deposition and trial. It was not the placenta. You clearly see the vagina being pulled out of the bat's body when she's pulling the umbilicus and placenta out. I posted video and photos.

21. She'd already yanked out the placenta which is what helped cause the prolapse, besides cutting way too much and pulling too hard. She really needs to get her vision checked. Someone with very bad vision is the last person who should be slicing into microbats.

*Truth. In the video which I posted she said "she's going to prolapse." In her book she said only cut once or twice. She cut the bat three times in the video. In the video she said she cut too much. In her book she says don't pull the umbilicus. In the video she did. She admitted she had vision issues and needed glasses in trial

and her deposition. She uses a few pair of glasses which trying to perform surgery. She lost a needle in a bat she was suturing.

22. Yeah, I look like crap in the videos but at least there are no videos of me hacking an animal to death.

*Truth. I look like crap in the videos. There are no videos of me hacking animals to death. This statement is not about Lollar but me.

23. She's been breeding her bats illegally. She's committing fraud asking for money for a project she cannot and will not do.

*Truth. She brags that her bats are breeding. That is against her permit. She is asking for money for a bat assurance colony. She has no permits for threatened or endangered bats. She suggests putting them in a building. That is not what an assurance colony is.

24. She said she would use the bag for the trip then return it to Walmart for a refund. She admitted to me with an evil laugh that she does this frequently.

*Truth. She told me this while walking around Walmart.

25. Rabies complaint against Bat World Sanctuary. General sanitation laws, harboring high risk rabies animals, allowing them in downtown.

*Truth. I posted a rabies complaint against Bat World made by the City health inspector and city manager. The report stated these things. I posted the report.

26. Amanda Lollar and her buildings have been written up so many times for building violations, safety issues, rabies, histoplasmosis, no address, unsightly building, build up of guano 6-8 feet... People have been reporting her smelly building and rabid bats for over 15 years.

*Truth. I did an info act request and received 600 pages of complaints against Bat World from the City of Mineral Wells and others. The reports span 18-20 years. That is what the reports said. I posted the reports.

27. She's basically experimenting on bats. The bats are dying because she doesn't take them to the vet. That's okay because she can just go get more bats.

*Truth. She admitted in deposition she taught herself surgery through trial and error, school of life. She admitted bats sometimes die.

28. Amanda Lollar of Bat World Sanctuary found guilty of illegally breeding bats at her facility. It is a violation of her permit.

*Truth. She admitted bats are breeding in her facility. Warden emailed TPWD that bats are breeding in her facility. She posted the genealogy in her book. She brags in her website and online that she has the ONLY captive breeding colony of insectivorous bats which isn't true. Other places breed bats, with a permit. She bragged they were breeding in trial.

29. Amanda Lollar of Bat World Sanctuary is now sending threats of extortion from Mineral Wells, Texas. Because she's sending it over the computer it's a Federal crime.

*Truth. She extorted me online. I have a copy of it showing what she wrote and that she sent it. I posted that evidence.

30. She has violated the following regulations listed on her permit. "15 a. Permit holder is prohibited from a. Propagating, selling or bartering animals or animal remains received or held under authority of this permit." She is allowing the bats to breed.

*Truth. That is cut/paste from her permit. She admitted the bats are breeding. So did the warden.

31. The complaints going back 18 years were about alleged animal cruelty, animal neglect, violations of the health code and building and safety regulations.

*Truth. I posted the actual reports.

32. The complaints stretching back 18 years were about animal cruelty, animal neglect, violations of the health code, violations of Texas Parks & Wildlife regulations, violations of the Animal Welfare Act, building violations and a report about a rabid bat biting a toddler directly next door to Bat World Sanctuary.

*Truth. I posted the actual reports, newspaper article, city investigation notes.

33. Here is the disgusting photo of my face which they photoshopped semen onto. They then added this caption "Yep, screw you too, Mmmmary!" They named the file "mmmm." This is how disgusting and childish these people are.

*Truth. I posted a photo defendants made of me. That is what it said. I never said Lollar posted it. I said "they" as in defendants in my defamation case.

I must remove these URLs in their entirety meaning I must remove the pdf files.

1. An email from the warden to Texas Parks & Wildlife stating that bats are breeding in Lollar's facility.

*Truth. I didn't write the email. The warden did.

2. Amanda Lollar's 1994 manual which she wrote. She stated that she euthanizes bats by freezing them to death which is illegal and inhumane according to the AVMA and bat experts.

*Truth. I didn't write her book. It was not copyrighted. It said I could share it in whole or in part. I posted where the AVMA states that freezing bats to death is inhumane and cruel.

3. A photo that defendants made of me. They took a photo of my face and photoshopped semen on my face.

*Truth. Defendants made and posted that photo. I didn't say Lollar did it by herself.

I must remove these items from my page on my defamation lawsuit against her.

1. She's the one who handles rabid bats with her bare hands.

*Truth. She allowed me to take video of herself holding a rabid bat in her bare hands. I posted the video and stills.

I must remove this from my facebook page.

1. Update: Health Dept. forced Bat World Sanctuary to leave town. In January they gutted the building, cleaned it and removed her property.

*Truth. Lollar stated in a letter to the city she was leaving because of the complaints. I posted that letter. Her neighbor sent an email to the city saying the new owner gutted the building. City manager sent an email stating the new owner removed Lollar's personal items. Lollar admitted this in trial.

2. Amanda who runs bat sanctuary just uses her bare hands. The rabid bats even bite her.

*Truth. I showed video of Lollar holding a rabid bat in her bare hands. She admitted that the bats bite her.

I must remove this from Animal Advocates' facebook page.

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I must remove this from my Google page

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I must remove this from my Twitter page

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2. Update: Health Dept. forced Bat World Sanctuary to leave town. In January they gutted the building, cleaned it and removed her property.

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3. Amanda Lollar commits animal cruelty at Bat World Sanctuary (a link to page that doesn't exist)

*Truth. I posted photos and videos of her committing animal cruelty. Texas Veterinary Board told me she was committing animal cruelty.

I must remove this from my MySpace page

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I am not allowed to post any video of any episiotomy made at Bat World.

*That is prior restraint which is unconstitutional. Video of her performing an episiotomy is not defamation. It is also not breach of contract.