

Cause No. 153-319405-20

Kristin Garcia,

Plaintiff,

v.

**Carroll Independent School
District Board of Trustees, et al.,**

Defendants

IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

153rd JUDICIAL DISTRICT

**ORDER GRANTING PLAINTIFF’S EMERGENCY MOTION FOR
EXPEDITED DISCOVERY**

The Court has granted Plaintiff’s Emergency Motion for Temporary Restraining Order and has set a Temporary Injunction hearing for December 14, 2020, commencing at 10:00 a.m.

Plaintiff has now filed an Emergency Motion for Expedited Discovery. Due to the exigent circumstances set forth in Plaintiff’s Emergency Motion for Expedited Discovery, the Court has considered the motion on an emergency ex parte basis. After careful consideration of Plaintiff’s Emergency Motion for Expedited Discovery, Plaintiff’s Motion for Temporary Restraining Order, and Defendants’ filings in this matter, the Court hereby GRANTS such Emergency Motion.

IT IS, THEREFORE, ORDERED that Defendants shall deliver—via hand deliver, or electronic service—to Ms. Garcia’s counsel of record (H. Dustin Fillmore III) before 5:00 p.m. on December 7, 2020, the following documents:

1. A true and correct copy of each written and/or recorded communication (including electronic communications such as emails or text messages) sent or received by a member of the Carroll Independent School District Board of Trustees to or from another member (or members) of the Carroll Independent School District Board of Trustees since October 26, 2018, that mentions, discusses, or references any of the following:



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- Cultural Competence Action Plan or CCAP;
 - District Diversity Council (including any subcommittee of the District Diversity Council);
 - Microaggressions, including tracking of Microaggressions;
 - Either of the videos that surfaced on social media that are referenced in the CCAP under the section entitled “Problem/Challenge/Opportunity”;
 - Texas Open Meetings Act or TOMA;
 - Southlake Anti-Racism Coalition or SARC;
 - Campus Diversity Councils (CDC);
 - Student Code of Conduct; and/or
 - Texas Open Meetings Act, including TOMA.
2. A true and correct copy of each written and/or recorded communication (including electronic communications such as emails or text messages) sent or received by a member of the Carroll Independent School District Board of Trustees to or from an employee of Carroll Independent School District since October 26, 2018, that mentions, discusses, or references any of the following:
- Cultural Competence Action Plan or CCAP;
 - District Diversity Council (including any subcommittee of the District Diversity Council);
 - Microaggressions, including tracking of Microaggressions;
 - Either of the videos that surfaced on social media that are referenced in the CCAP under the section entitled “Problem/Challenge/Opportunity”;
 - Texas Open Meetings Act or TOMA;
 - Southlake Anti-Racism Coalition or SARC;
 - Campus Diversity Councils (CDC);
 - Student Code of Conduct; and/or
 - Texas Open Meetings Act, including TOMA.
3. A true and correct copy of each document constituting a Carroll Independent School District (including Carroll Independent School District Board of Trustees) policy, procedure, or training material that has been in effect or utilized at any time since October 26, 2018 that discusses any of the following topics:
- The Texas Open Meetings Act or TOMA;
 - document retention.

IT IS FURTHER ORDERED that, between December 8, 2020 and December 11, 2020, Plaintiff has the right to take the oral depositions of Defendants, including Dr. Jeremy Lyon. Any such deposition noticed by Plaintiff shall be limited to 2 hours, not

including any breaks or time spent off-the-record.

IT IS SO ORDERED.

Signed this 2nd day of December, 2020.



JUDGE PRESIDING

From: [Stacci L. Reynolds](mailto:Stacci.L.Reynolds)
To: DUSTY@FILLMOREFIRM.COM; JONATHAN@MITCHELL.LAW; CWOOD@WABSA.COM; MWALKER@WABSA.COM; KKALCHTHALER@WABSA.COM
Subject: 153-319405-20; Order Granting Expedited Discovery
Date: Wednesday, December 2, 2020 10:59:00 AM
Attachments: [15331940520000065.pdf](#)

Please find attached a signed order from the court.

Stacci L. Reynolds
153rd Associate Court Clerk
Tarrant County District Clerk
100 N. Calhoun ST, 2nd Floor
Fort Worth, TX 76196
817-884-2558
slreynolds@tarrantcounty.com

