

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

1) **S.J., as parent, Conservator, and** §
Next Friend of N.J., §
§
Plaintiff, §
§
v. §
§
2) **PERRYTON INDEPENDENT** §
SCHOOL DISTRICT, and §
§
3) **COLE UNDERWOOD,** §
individually and in his official §
capacity as Athletic Director of §
Perryton ISD, §
§
Defendants. §

Case No. 2:24-CV-00168-Z

NOTICE OF SUBPOENA DUCES TECUM

NOTICE IS HEREBY GIVEN that Plaintiff, S.J., as parent, Conservator, and Next Friend of N.J., has caused the *Subpoena* attached hereto as **Exhibit A** to be issued and served on Amarillo Independent School District on the 14th day of August 2025 to produce certain documentation and information described therein.

Respectfully submitted,

/s/ Tyler L. Gentry
Tyler L. Gentry, OBA No. 32400
Kyle Goodwin, OBA No. 17036 and
SBN 24117975
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and

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(806) 242-0159 – Fax
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served on all parties of record via regular and electronic mail on the 14th day of August 2025.

/s/ Tyler L. Gentry
Tyler L. Gentry

4. A complete copy of all internal Amarillo ISD communications between Amarillo ISD personnel regarding Cole Underwood following his employment at Amarillo ISD to present.
5. A complete copy of all correspondence between any Amarillo ISD personnel and Canyon ISD personnel regarding Cole Underwood prior to or during Cole Underwood's employment with Amarillo ISD.
6. A complete copy of all correspondence between any Amarillo ISD personnel and anyone else, including amongst themselves, regarding Cole Underwood prior to his employment at Amarillo ISD.
7. A complete copy of all correspondence between any Amarillo ISD personnel and anyone else, including amongst themselves, regarding Cole Underwood during his employment at Amarillo ISD.
8. A complete copy of all correspondence between any Amarillo ISD personnel and anyone else, including amongst themselves, regarding Cole Underwood following the conclusion of his employment at Amarillo ISD to present.
9. A complete copy of all correspondence between any Amarillo ISD personnel and Perryton ISD personnel regarding Cole Underwood or the *Complaint* filed in this lawsuit, from January 1, 2017 to present.
10. A complete copy of all correspondence between any Amarillo ISD personnel and any other person or entity regarding Cole Underwood or the *Complaint* filed in this lawsuit, from January 1, 2017 to present.
11. A complete copy of all complaints and/or reports submitted by any person to Amarillo ISD regarding Cole Underwood, regardless of whether said complaints and/or reports appear in Cole Underwood's personnel file.
12. A complete copy of any and all investigations performed by Amarillo ISD, or any other individual or entity on behalf of Amarillo ISD, such as a law enforcement or other state agency, regarding Cole Underwood during Cole Underwood's employment with Amarillo ISD.
13. A complete copy of all documentation regarding any period of administrative leave Cole Underwood was placed on during his employment with Amarillo ISD.

Place: GOODWIN LEWIS, PLLC
c/o Tyler Gentry
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Date and Time: August 29, 2025, at 9:00 a.m.

You may excuse your attendance at the above location and comply with this Subpoena Duces Tecum by delivery of the requested documents, by mail or electronic mail, on or before the date in question to the above-mentioned address. Notice has been provided pursuant to FED. R. CIV. P. 45(a)(4). In order to allow objections to the production of documents and things to be filed, you should not produce them until the date specified in this subpoena, and if an objection is filed, until the Judge rules on the objection.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

DATED this 14th day August 2024.

Respectfully submitted,

/s/ Tyler L. Gentry

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