

471-08602-2025

Cause No. _____

JOHN ROE 1, a minor, by and through §
his parent and next friend, JANE ROE 1, §

JOHN ROE 2, a minor, by and through §
his parent and next friend, JANE ROE 2, §
and §

JOHN ROE 3, a minor, by and through §
his parent and next friend, JOHN ROE 4 §

Plaintiffs,

v.

CELINA INDEPENDENT SCHOOL §
DISTRICT, §

DR. THOMAS A. MAGLISCEAU, §

ALLISON N. GINN, §

WILLIAM E. ("BILL") ELLIOTT, §
and §

WILLIAM C. ("CALEB") ELLIOTT §

Defendants.

IN THE DISTRICT COURT

COLLIN COUNTY, TEXAS

____ JUDICIAL DISTRICT

PLAINTIFFS' ORIGINAL PETITION

COMES NOW, Plaintiffs John Roe 1, a minor, by and through his parent and next friend, Jane Roe 1; John Roe 2, a minor, by and through his parent and next friend, Jane Roe 2; and John Roe 3, a minor, by and through his parent and next friend, John Roe 4; and their attorneys of record, and based on information and belief, allege and state as follows:

I. INTRODUCTION

1. This action arises from a stark and troubling reality: in our community, the prestige and power of a successful football program—and the singular influence of its head coach—became

an end unto itself, eclipsing the most basic duties of care owed to children. The program's on-field victories, financial contributions, and civic stature fostered a culture of deference that distorted judgment, eroded accountability, and rewarded silence. Within that culture, administrators and other responsible adults ignored, minimized, or rationalized obvious signs of wrongdoing and child abuse. What should have prompted immediate reporting, investigation, and intervention instead triggered institutional self-protection, image management, and the shielding of favored insiders. The defendants' decisions were not isolated lapses. They were the foreseeable product of a hierarchy that placed the coach's brand and the program's dominance above the safety and dignity of vulnerable children.

2. State law forces parents to hand their children over to the care and custody of Texas schools for the vast majority of waking moments those minor children spend during their formative years. As a result, the law places an extremely high duty of care on teachers and school administrators to ensure the safety and well-being of each and every student placed under their care. Schools today are dangerous enough to require metal detectors, clear backpacks, on-campus police officers, and active shooter drills. Parents should not also have to worry about whether those tasked with guarding their kids are doing their jobs or, worse still, whether those adults are the very ones putting their kids in danger.

3. Plaintiffs bring this action to vindicate the rights of those harmed by the defendants' actions and to ensure accountability where informal power eclipsed legal duty. Plaintiffs seek damages and relief commensurate with the injuries suffered and the degree of defendants' misconduct, as well as measures necessary to dismantle the structures and practices that enabled abuse to go unreported and unremedied. The law does not permit administrators to trade a child's safety for Friday night glory. This petition asks the Court to say, unequivocally, that they may not.

II. PARTIES

4. Plaintiffs are parents and their minor children, victims of the acts described herein. Due to extreme privacy concerns and the highly sensitive and personal nature of this matter, Plaintiffs are all identified by way of pseudonyms to protect their identities. This anonymization is consistent with the intent of Texas Civil Procedure Rule 21(c). Plaintiffs' identities will be made known to Defendants, through their counsel of record, as each Defendant designates counsel by appearance and answer.

5. Plaintiff **Jane Roe 1** (last three digits of identification number: 429; last three digits of social security number: 853) is an individual residing in Collin County, Texas. Plaintiff Jane Roe 1 proceeds as next friend of **John Roe I**, her minor child.

6. Plaintiff **Jane Roe 2** (last three digits of identification number: 913; last three digits of social security number: 070) is an individual residing in Collin County, Texas. Plaintiff Jane Roe 2 proceeds as next friend of **John Roe 2**, her minor child.

7. Plaintiff **John Roe 4** is an individual residing in Collin County, Texas. The last three digits of identification number: 899; last three digits of social security number: 009) Plaintiff John Roe 3 proceeds as next friend of **John Roe 3**, his minor child.

8. Defendant **Celina Independent School District ("Celina ISD" or "the District")** is an independent school district situated in Collin County, Texas. Defendant Celina ISD may be served with process by serving Dr. Thomas Albert Maglisceau, its Superintendent, at 205 S. Colorado Street, Celina, Collin County, Texas 75009, the administrative offices of the ISD.

9. Defendant **Dr. Thomas A. Maglisceau ("Dr. Maglisceau")** is and was at all times relevant hereto the Superintendent of Celina ISD and was responsible for the hiring, supervision, retention, and discipline of District employees, including Defendants Allison Ginn, Bill Elliot, and

Caleb Elliot. Dr. Maglisceau is a resident of Collin County, Texas, and may be served with process at his primary residence at 2783 Kessler Drive, Celina, Collin County, Texas, 75009 or wherever he may be found.

10. Defendant **Allison N. Ginn (“Principal Ginn”)** is and was at all times relevant hereto, the Principal of Jerry and Linda Moore Middle School (“Moore Middle School”), located at 300 E. G.A. Moore Pkwy, Celina, Collin County, Texas 75009. Principal Ginn was responsible for the direct supervision of Defendant Caleb Elliott and the safety of students at Moore Middle School. Principal Ginn is a resident of Collin County, Texas and may be served with process at her primary residence at 4425 Bungalow Lane, McKinney, Texas, 75071 or wherever she may be found.

11. Defendant **William E. “Bill” Elliott (“Bill Elliott”)** is and was at all times relevant hereto, the Athletic Director of Celina ISD and Head Football Coach at Celina High School, located at 3455 N. Preston Road, Celina, Collin County, Texas 75009. Bill Elliott was directly responsible for hiring, supervising, and retaining his son, Defendant Caleb Elliott, in coaching positions within the District. Defendant Bill Elliott is a resident of Collin County, Texas, and may be with process at his primary residence at 9831 County Road 128, Celina, Texas 75009 or wherever he may be found.

12. Defendant, **William C. “Caleb” Elliott (“Caleb Elliott”)** was a at all times relevant hereto, employed by Defendant Celina ISD as a teacher and football coach at Celina High School and Moore Middle School. Defendant Caleb Elliot is a resident of Collin County, Texas and may be served with process at his primary residence served at 3913 Milo Drive, McKinney, Texas 75071 or wherever he may be found.

13. Whenever in this Petition it is alleged that Defendant Celina ISD did or failed to

do any act or thing, it is meant that Celina ISD, through their governing body, directors, officers, agents, servants, employees and/or other representatives and/or independent contractors subject to its control, did or failed to do any act or thing and that, at the time such conduct occurred, it occurred with the authorization and/or ratification of Celina ISD and/or was done in the normal and routine course and scope of employment or agency of Celina ISD, and/or pursuant to Celina ISD's direction and control.

III. DISCOVERY CONTROL PLAN

14. Pursuant to TEX. R. CIV. P. 190.4, Plaintiff specifically pleads that this lawsuit should be conducted under Level 3 Discovery Control Plan.

IV. AMOUNT IN CONTROVERSY

15. Pursuant to TEX. R. CIV. P. 47(c), Plaintiff states that she seeks only monetary relief in excess of \$1,000,000.

V. JURISDICTION AND VENUE

16. Subject-matter jurisdiction is appropriate in this Court in that this is a lawsuit seeking damages in excess of the minimum jurisdictional limits of district courts in Collin County, Texas.

17. As further supported by Plaintiff's allegations below, which are fully incorporated into this paragraph by reference, the Court has personal jurisdiction over all Defendants since the tortious events or omissions alleged herein occurred in Texas. This lawsuit and the operative facts thereof have a substantial connection to all Defendants' significant contacts with Texas. In addition, at all times relevant or necessary all Defendants resided in Texas.

18. Venue is mandatory in Collin County because this suit involves invasion of privacy and Defendant Caleb Elliot resided in Collin County at the time of filing suit. *See* TEX. CIV. PRAC. & REM. CODE § 15.017.

19. Alternatively, venue is proper in Collin County because all or a substantial part of the events or omission giving rise to Plaintiffs' claims occurred in Collin County, Texas. *See* TEX. CIV. PRAC. & REM. CODE § 15.002(a)(1).

20. Because this action is not brought under the Texas Tort Claims Act, Chapter 101 of the Civil Practice and Remedies Code, its mandatory venue provisions do not apply.

VI. FACTS

A. Caleb Elliott: A Predator Enabled by Nepotism and Willful Blindness

21. Defendant Bill Elliott has been part of the Celina ISD football program for over three decades. He took over as Head Football Coach of Celina High School in 2012.

22. Bill Elliott's teams saw sustained success, culminating in a 2024 state championship, cementing him as the face of Celina athletics and a mainstay of the district's program.

23. Over time, Elliott's on-field success translated into outsized influence within Celina ISD.

24. Caleb Elliott, son of Head Coach Bill Elliott, was a former Celina High School football player who followed his father into coaching.

25. During the 2022-23 school year, Caleb Elliott began working at Celina High School as a substitute teacher while serving as a coach.

26. While an employee at the high school, Caleb Elliott did the unthinkable: he began an illegal sexual relationship with a vulnerable teenaged student.

27. This was not a mistake. This was not poor judgment. This was a crime—a violation of Texas Penal Code Section 21.12, a betrayal of the most fundamental duty of every educator: to protect, not prey upon, the children entrusted to their care.

28. When Celina ISD discovered this illegal relationship, they faced a moment of moral clarity. They could do what was right—terminate Elliott immediately, report him to law enforcement, protect the victim, and send an unmistakable message that no one, regardless of their last name or connections, would be allowed to sexually exploit students.

29. Tragically, that is not what happened.

30. Upon information and belief, Celina ISD did not terminate Caleb Elliott’s employment.

31. The District did not report Caleb Elliott to law enforcement for criminal investigation of the illegal relationship with a student.

32. The District did not report Caleb Elliott to the State Board for Educator Certification for immediate investigation and potential revocation of his teaching certificate.

33. Instead, in a calculated act of institutional cowardice, they simply moved him.

34. In an apparent attempt to quietly handle a scandal involving the son of the revered head coach, Celina ISD simply moved Caleb Elliott from Celina High School across the Parkway to Moore Middle School.

35. Let that sink in: when faced with an adult who had sexually exploited a child, Celina ISD’s solution was to give him access to younger children.

36. This transfer, effectuated in summer 2023, placed Caleb Elliott in a position of authority over 6th-grade students as their Social Studies teacher and over 8th-grade boys as their football coach.

37. Again, this was not an error in judgment. This was not a well-intentioned mistake. This was a deliberate decision by adults in positions of power to sacrifice children on the altar of reputation.

38. Defendants' decision to transfer rather than terminate a sexual predator, Caleb Elliott and place him in direct, unsupervised contact with even younger, more vulnerable, more trusting, and more easily manipulated children is unconscionable.

39. The message was clear: the football program and those connected to it would be protected, no matter the cost to children.

40. Upon information and belief, at least one Celina ISD employee reported to the school that Caleb Elliott behaved inappropriately with children. That employee was told his report was not true. Because his reports were ignored, this employee moved to a different school district.

B. Caleb Elliott Gains Unfettered and Unsupervised Access to Vulnerable Young Boys

41. John Roe 1, John Roe 2, and John Roe 3 were students at Moore Middle School during the 2024-25 and 2025-26 school years.

42. All three boys participated in the Moore Middle School football program, where they were coached by Caleb Elliott.

43. The boys were 13-14 years old—full of energy, dreams of high school football glory, and an inherent trust in the adult coaches who promised to guide them.

44. These boys and their families did what families across America do every single day: they entrusted their children to the school district. They believed—they had every reason to believe—that the adults at Moore Middle School would protect their sons, would nurture them, would keep them safe.

45. Caleb Elliott held positions of authority, trust, and supervision over these minor boys.

46. As a teacher and their coach, he had complete, unsupervised access to them throughout the school day, during athletics, at practices, and—most critically—in the locker room where boys showered, changed, and were the most vulnerable.

47. Upon information and belief, at some point during the 2024-25 school year, Caleb Elliott was caught placing hidden cameras in the boys' locker room at Moore Middle School.

48. Once again, Celina ISD chose to protect the predator instead of the children.

49. Upon information and belief, the District did not terminate Elliott. They did not call the police. They did not conduct a thorough investigation.

50. Instead, Celina ISD simply instructed Elliott that he was banned from entering the boys' locker room when students were present.

51. Upon information and belief, Celina ISD sent carefully worded “apology letters” to select parents.

52. Upon information and belief, Celina ISD took no meaningful steps to ensure Elliott complied with the locker room ban. No additional supervision. No monitoring. No safeguards to protect the boys.

53. The District simply hoped that nothing else would happen, that their secret would stay buried, that they could protect the Elliott family name and the District's reputation without anyone getting hurt.

54. This was the second time—**the second time**—at least, that Celina ISD discovered serious sexual misconduct by Caleb Elliott involving students, and the second time they chose institutional self-preservation over child protection.

C. The 2025-26 School Year: Caleb Elliott Escalates His Predatory Behavior

55. When the 2025-26 school year began in August 2025, Caleb Elliott returned to Moore Middle School as if nothing had happened. He still taught 6th-grade Social Studies. He still coached 8th-grade football. He still had unfettered access to young boys.

56. Players quickly noticed that Caleb Elliott would avoid the locker room when the head coaches—Troy Davis (Boys Athletic Coordinator) and Chase Martin (Middle School Football Coach)—were present.

57. But when those coaches retreated to their office, Caleb Elliott would appear like a shadow. He would enter the locker room where the boys showered and changed.

58. Players saw him position himself strategically near the showers, near the changing areas, staring wordlessly at the boys as they undressed, showered, and changed.

59. The boys felt the crawling sensation of being watched, the inexplicable discomfort of an adult's eyes on their exposed bodies. But they were children. They lacked the context, the experience, the vocabulary to name what was happening to them.

D. October 2025: Caleb Elliott Is Caught Secretly Recording Nude Boys

60. Soon, the boys began to suspect Caleb Elliott was doing more than watching—they believed he was photographing and videotaping them with his smartphone.

61. John Roes 1, 2, and 3, along with other students observed Caleb Elliott on multiple occasions holding his phone casually at his waist, sometimes with arms crossed, positioned so the camera lens pointed outward toward the boys as they showered, undressed, and changed.

62. On October 2, 2025, John Roe 1 and 2 witnessed Elliott unmistakably and intentionally capturing multiple photographs on his cell phone of the boys in various states of

undress, including completely nude, in the changing area and showers of the Moore Middle School locker room.

63. With bravery no child should have to summon, John Roe 1 and John Roe 2 told their parents who contacted Celina Police Department. Because no adult at Celina ISD would stand up for the boys in the locker room, it fell to two middle-schoolers to do what the adults at Celina ISD should have done long ago: speak up against Caleb Elliot.

64. Celina Police obtained and executed a search warrant for Caleb Elliott's cell phone at Moore Middle School.

65. That same day, Elliott was arrested and charged with Invasive Visual Recording, a state jail felony under Texas Penal Code Section 21.15—an offense that TRCP 118 expressly recognizes as an act of sexual misconduct that waives immunity for public schools. Tex. Civ. Prac. & Rem. Code § 118.001(4).

66. A forensic analysis of Elliott's phone revealed the nightmare that every parent fears and every child should be protected from.

67. Caleb Elliott had been systematically recording young boys in the locker room, creating a collection of child sexual abuse material.

68. On October 9, 2025, Caleb Elliott was arrested a second time, this time charged with Possession of Child Pornography, a second-degree felony under Texas Penal Code Section 43.26.

69. According to the arrest warrant and affidavit, investigators found at least twelve (12) photographs on Caleb Elliott's phone that meet the legal criteria for child pornography—images depicting young boys nude or in various states of undress, their private areas exposed.

70. According to the Celina Police Department, by the end of October 9, 2025, more than thirty (30) families had been notified that their children were victims of Elliott’s criminal conduct. That is just what we know of so far.

E. The District’s Belated Response and Continued Protection of Enablers

71. On October 15, 2025, Superintendent Maglisceau and the Celina ISD Board of Trustees brokered a deal with Caleb Elliott which allowed him to resign in lieu of termination if he agreed to voluntarily surrender his teaching certificate.

72. Only *after* Elliott’s arrest became a media sensation, only *after* community outrage reached a boiling point, only *after* the eyes of Texas were on Celina did the District finally retain an attorney to conduct an “independent investigation.”

73. This investigation began on October 7, 2025—four days *after* Elliott’s arrest, *after* the damage was done, after the children were victimized, *after* the predator had been caught red-handed by police rather than by the District that employed him.

74. On October 24, 2025,—twenty-one days *after* Elliott’s arrest, *after* a lawsuit was filed, *after* state officials demanded accountability—Celina ISD finally placed Defendants Principal Allison Ginn and Athletic Director and Head Coach Bill Elliott on paid administrative leave.

75. As of the filing of this lawsuit, Dr. Maglisceau remains in his position as Superintendent despite presiding over a District that:

- a. Failed to terminate a teacher who had an illegal sexual relationship with a student;
- b. Transferred that predator to a middle school rather than reporting him to law enforcement;

- c. Failed to terminate the predator after he placed hidden cameras in a middle school locker room;
- d. Failed to implement any meaningful supervision or safeguards after learning of the hidden cameras;
- e. Allowed the predator continued access to young boys, enabling months of ongoing sexual abuse and the creation of child pornography.

F. The Devastating Impact on the Young Victims

76. Since learning they were secretly photographed and recorded naked by their teacher and coach, John Roe 1, John Roe 2, and John Roe 3 have suffered severe emotional and psychological trauma.

77. They struggle to attend school and have difficulty concentrating on their studies.

78. They have been unable to continue participating in athletics, an activity they once loved.

79. They experience severe anxiety when using or even thinking about using locker rooms, showers, or other changing facilities.

80. They have lost their sense of safety and trust in adults, particularly those in positions of authority.

81. They feel violated, ashamed, and betrayed by an adult they were taught to trust and respect.

82. They are haunted by the knowledge that images of their naked bodies exist and were created by their coach for his sexual gratification.

83. They know these images may exist forever, potentially on the internet, to be viewed by other predators.

84. They require and will continue to require professional psychological counseling and therapy to process this trauma and attempt to heal.

85. Their parents are devastated, struggling with guilt and anger that they entrusted their children to a school district that repeatedly, consciously failed to protect them.

86. These boys' childhoods have been stolen. Their innocence has been shattered. Their trust has been destroyed.

87. And it could have been prevented if Defendants had done their jobs and protected children instead of protecting a predator and the reputation of a football program.

VII. CAUSES OF ACTION

A. GROSS NEGLIGENCE

(As to Defendant Celina Independent School District)

88. Plaintiff re-alleges and incorporates by reference all the foregoing allegations as if fully set forth herein.

89. Plaintiffs proceed against Defendant Celina Independent School District pursuant to Chapter 118 of the Texas Civil Practice and Remedies Code (the "Act"), which effects a waiver and abolition of governmental and official immunity of public schools and professional school employees for certain conduct.

Defendant William Caleb Elliott

90. Defendant Celina Independent School District, a public school, was grossly negligent, reckless, or engaged in intentional misconduct, in hiring, supervising, or employing a professional school employee, Defendant William Caleb Elliott, rendering it liable for an act or omission that is committed by the employee against a student enrolled in the school and that is sexual misconduct or failure to report suspected child abuse or neglect under Section 261.101, Family Code. Tex. Civ. Prac. & Rem. Code § 118.002(a).

91. Defendant Celina Independent School District was grossly negligent in:

- a. continuing to employ Elliott after the discovery of an improper relationship with a student;
- b. transferring Elliott to the middle school after that discovery;
- c. not terminating Elliott after the discovery of hidden cameras in the middle school locker room;
- d. insufficiently supervising Elliott's interactions with young boys, including the minor Roe Plaintiffs;
- e. failing to train Elliott and others by way of written policies and continuing education in a manner which could have avoided the abuse herein described;
- f. allowing Elliott's in the locker room whether or not he was banned; and
- g. failing to report/and or act on Elliott's conduct;

92. Viewed objectively, Caleb Elliot's continued employment around minor children involved an extreme degree of risk; and Celina ISD, with actual awareness of that risk from Elliott's prior misconduct, nevertheless acted with conscious indifference to Plaintiffs' rights and safety.

93. Each of these acts and omissions, singularly or in combination with others, constituted gross negligence which proximately caused the sexual conduct herein described and Plaintiff's resulting injuries. Had Defendant Celina Independent School District undertaken any preventative measures— including criminal complaint or termination—Plaintiffs would not have been subject to said conduct.

94. In compliance with the Act, Plaintiffs have named the professional school employee who committed the act or omission on which the claim is based, Defendant William Caleb Elliott, as a defendant. Tex. Civ. Prac. & Rem. Code § 118.002(b).

95. Defendant Celina Independent School District is a public school within the meaning of the Act because it is “an independent school district or open-enrollment charter school.”

96. Defendant William Caleb Elliott was a “professional school employee” because at all times described herein, he was a teacher employed by a public school, namely, Defendant Celina Independent School District.

97. The acts or omissions complained of herein were committed by the professional school employee, Defendant William Caleb Elliott, against students enrolled in the school, the minor Roe Plaintiffs above described, and the acts or omissions constituted sexual conduct.

98. The acts or omissions constituted “sexual conduct” within the meaning of the Act because it constituted sexual abuse or one or more of the enumerated statutes in the Act, See Tex. Civ. Prac. & Rem. Code § 118.001(4), including but not limited to Texas Penal Code:

- a. § 21.02(c)(6). Continuous Sexual Abuse of Young Child or Disabled Individual;
- b. § 21.11(a)(2)(B). Indecency with a Child by Causing the Child to Expose the Child’s Anus or Any Part of the Child’s Genitals;
- c. § 21.15. Invasive Visual Recording in a Changing Room;
- d. § 21.17. Voyeurism;
- e. § 21.18. Sexual Coercion;
- f. § 21.19 – Unlawful Electronic Transmission of Sexually Explicit Visual Material;
- g. § 43.25. Sexual Performance by a Child.

Defendant Bill Elliott

99. Defendant Celina ISD was grossly negligent in hiring, supervising, and employing professional school employee Bill Elliott, making the District liable under Tex. Civ. Prac. & Rem. Code § 118.002(a)(2) for his qualifying acts or omissions against students—including failure to report suspected child abuse under Tex. Fam. Code § 261.101.

100. Upon information and belief, Defendant Bill Elliott knew of Caleb Elliott's misconduct described herein and did not report Caleb Elliott as required by Tex. Fam. Code Ann. § 261.101.

101. Specifically, Defendant Bill Elliott knew:

- a. Defendant Caleb Elliott had an improper relationship with a student;
- b. Defendants Caleb Elliott had been caught putting cameras in the middle school locker room; and
- c. Defendant Caleb Elliott behaved inappropriately with young boys, including exhibiting grooming behavior around such young boys.

102. Defendant Celina ISD's conduct in continuing to employ Defendant Bill Elliott was grossly negligent in that, when viewed objectively from the standpoint of Defendant Celina ISD at the time of the act or omission, the conduct involved an extreme degree of risk, considering the probability and magnitude of the potential harm to others, and in that Defendant Celina Independent School District had actual, subjective awareness of the risk involved, but, nevertheless, proceeded with conscious indifference to the rights, safety, and welfare of others, including Plaintiffs.

103. Each of these acts and omissions, singularly or in combination with others, constituted gross negligence which proximately caused the sexual conduct herein described and

Plaintiffs' resulting injuries. Had Defendant Celina ISD undertaken any preventative measures including criminal complaint or termination—Plaintiffs would not have been subject to said conduct.

104. In compliance with the Act, Plaintiff has named the professional school employee who committed the act or omission on which the claim is based, Defendant Bill Elliott, as a defendant. *See* Tex. Civ. Prac. & Rem. Code § 118.002(b).

105. Defendant Celina Independent School District is a public school within the meaning of the Act because it is “an independent school district or open-enrollment charter school.” *See* Tex. Civ. Prac. & Rem. Code § 118.001(1).

106. Defendant Bill Elliott was a “professional school employee” because at all times described herein, he served as both Athletic Director and Head Football Coach at Celina High School, making him “a superintendent or administrator serving as educational leader and chief executive officer of the school, principal or equivalent chief operating officer, teacher, including a substitute teacher, supervisor, social worker, school counselor, nurse, and teacher's aide employed by a public school, and any other person employed by a public school whose employment requires certification and the exercise of discretion.” *See* Tex. Civ. Prac. & Rem. Code § 118.001(2).

107. The acts or omissions complained of herein were committed by the professional school employee, Defendant Bill Elliott, against students enrolled in the school, the minor Roe Plaintiffs above described, and the acts or omissions constituted failure to report suspected child abuse or neglect under Tex. Fam. Code § 261.101.”

108. The acts or omissions constituted “failure to report suspected child abuse or neglect under Tex. Fam. Code Ann. § 261.101” because Defendant Bill Elliott had a reasonable cause to

believe that a child's physical or mental health or welfare had been adversely affected by abuse or neglect by his son, Defendant Caleb Elliott. *See* Tex. Fam. Code § 261.101(a).

109. The acts or omissions constituted "failure to report suspected child abuse or neglect under Tex. Fam. Code § 261.101" because Defendant Bill Elliott had reasonable cause to believe that a child had been abused or neglected or may be abused or neglected, or that a child was a victim of an offense under Section 21.11, Penal Code, and had reasonable cause to believe that the child has been abused as defined by Section 261.001, including:

- (A) mental or emotional injury to a child that results in an observable and material impairment in the child's growth, development, or psychological functioning;
- (B) causing or permitting the child to be in a situation in which the child sustains a mental or emotional injury that results in an observable and material impairment in the child's growth, development, or psychological functioning;
- (E) sexual conduct harmful to a child's mental, emotional, or physical welfare, including conduct that constitutes the offense of continuous sexual abuse of young child or disabled individual under Section 21.02, Penal Code, indecency with a child under Section 21.11, Penal Code, improper relationship between educator and student under Section 21.12, Penal Code, sexual assault under Section 22.011, Penal Code, or aggravated sexual assault under Section 22.021, Penal Code;
- (F) failure to make a reasonable effort to prevent sexual conduct harmful to a child; or
- (H) causing, permitting, encouraging, engaging in, or allowing the photographing, filming, or depicting of the child if the person knew or should have known that the resulting photograph, film, or depiction of the child is obscene as defined by Section 43.21, Penal Code, or pornographic;

Defendant Allison Ginn

110. Defendant Celina ISD was grossly negligent in hiring, supervising, and employing professional school employee Allison Ginn, making the District liable under Tex. Civ. Prac. & Rem. Code § 118.002(a)(2) for her qualifying acts or omissions against students—including failure to report suspected child abuse under Tex. Fam. Code § 261.101.

111. Upon information and belief, Defendant Allison Ginn knew of Caleb Elliott's misconduct described herein and did not report Elliot as required by Tex. Fam. Code § 261.101.

112. Specifically, Defendant Allison Ginn knew:

- a. Defendant Caleb Elliott had an improper relationship with a student;
- b. Defendants Caleb Elliott had been caught putting cameras in the middle school locker room; and
- c. Defendant Caleb Elliott behaved inappropriately with young boys, including exhibiting grooming behavior around such young boys.

113. Defendant Celina ISD's conduct in continuing to employ Defendant Allison Ginn was grossly negligent, in that, when viewed objectively from the standpoint of Defendant Celina Independent School District at the time of the act or omission, the conduct involved an extreme degree of risk, considering the probability and magnitude of the potential harm to others, and in that Defendant Celina Independent School District had actual, subjective awareness of the risk involved, but, nevertheless, proceeded with conscious indifference to the rights, safety, and welfare of others, including Plaintiffs.

114. Each of these acts and omissions, singularly or in combination with others, constituted gross negligence which proximately caused the sexual conduct herein described and Plaintiffs' resulting injuries. Had Defendant Celina ISD undertaken any preventative measures—

including criminal complaint or termination— Plaintiffs would not have been subject to said conduct.

115. In compliance with the Act, Plaintiff has named the professional school employee who committed the act or omission on which the claim is based, Defendant Allison Ginn, as a defendant. Tex. Civ. Prac. & Rem. Code § 118.002(b).

116. Defendant Celina Independent School District is a public school within the meaning of the Act because it is “an independent school district or open-enrollment charter school.” *See* Tex. Civ. Prac. & Rem. Code § 118.001(3).

117. Defendant Allison Ginn was a “professional school employee” because at all times described herein, she served as the Moore Middle School Principal, making her “a superintendent or administrator serving as educational leader and chief executive officer of the school, principal or equivalent chief operating officer, teacher, including a substitute teacher, supervisor, social worker, school counselor, nurse, and teacher's aide employed by a public school, and any other person employed by a public school whose employment requires certification and the exercise of discretion.” *See* Tex. Civ. Prac. & Rem. Code § 118.001(2)(A).

118. The acts or omissions complained of herein were committed by the professional school employee, Defendant Allison Ginn, against students enrolled in the school, the minor Roe Plaintiffs above described, and the acts or omissions constituted failure to report suspected child abuse or neglect under Tex. Fam. Code § 261.101.”

119. The acts or omissions constituted “failure to report suspected child abuse or neglect under Tex. Fam. Code § 261.101” because Defendant Allison Ginn had a reasonable cause to believe that a child’s physical or mental health or welfare had been adversely affected by abuse or neglect by Defendant Caleb Elliott.

120. The acts or omissions constituted “failure to report suspected child abuse or neglect under Tex. Fam. Code § 261.101” because Defendant Allison Ginn had reasonable cause to believe that a child had been abused or neglected or may be abused or neglected, or that a child was a victim of an offense under Section 21.11, Penal Code, and had reasonable cause to believe that the child has been abused as defined by Section 261.001, including:

(A) mental or emotional injury to a child that results in an observable and material impairment in the child's growth, development, or psychological functioning;

(B) causing or permitting the child to be in a situation in which the child sustains a mental or emotional injury that results in an observable and material impairment in the child's growth, development, or psychological functioning;

(E) sexual conduct harmful to a child's mental, emotional, or physical welfare, including conduct that constitutes the offense of continuous sexual abuse of young child or disabled individual under Section 21.02, Penal Code, indecency with a child under Section 21.11, Penal Code, improper relationship between educator and student under Section 21.12, Penal Code, sexual assault under Section 22.011, Penal Code, or aggravated sexual assault under Section 22.021, Penal Code;

(F) failure to make a reasonable effort to prevent sexual conduct harmful to a child;

(H) causing, permitting, encouraging, engaging in, or allowing the photographing, filming, or depicting of the child if the person knew or should have known that the resulting photograph, film, or depiction of the child is obscene as defined by Section 43.21, Penal Code, or pornographic;

Dr. Thomas A. Maglisceau

121. Defendant Celina ISD was grossly negligent in hiring, supervising, and employing professional school employee Dr. Thomas Maglisceau, making the District liable under Tex. Civ. Prac. & Rem. Code § 118.002(a)(2) for his qualifying acts or omissions against students—including failure to report suspected child abuse under Tex. Fam. Code § 261.101.

122. Upon information and belief, Defendant Dr. Maglisceau knew of Caleb Elliott's misconduct described herein and did not report Elliot as required by Tex. Fam. Code § 261.101.

123. Specifically, Dr. Maglisceau knew:

- a. Defendant Caleb Elliott had an improper relationship with a student;
- b. Defendants Caleb Elliott had been caught putting cameras in the middle school locker room; and
- c. Defendant Caleb Elliott behaved inappropriately with young boys, including exhibiting grooming behavior around such young boys.

124. Defendant Celina Independent School District's conduct in continuing to employ Defendant Dr. Maglisceau was grossly negligent, in that, when viewed objectively from the standpoint of Defendant Celina Independent School District at the time of the act or omission, the conduct involved an extreme degree of risk, considering the probability and magnitude of the potential harm to others, and in that Defendant Celina Independent School District had actual, subjective awareness of the risk involved, but, nevertheless, proceeded with conscious indifference to the rights, safety, and welfare of others, including Plaintiffs.

125. Each of these acts and omissions, singularly or in combination with others, constituted gross negligence which proximately caused the sexual conduct herein described and Plaintiffs' resulting injuries. Had Defendant Celina ISD undertaken any preventative measures—

including criminal complaint or termination—Plaintiffs would not have been subject to said conduct.

126. In compliance with the Act, Plaintiff has named the professional school employee who committed the act or omission on which the claim is based, Defendant Dr. Maglisceau, as a defendant. *See* Tex. Civ. Prac. & Rem. Code § 118.002(b).

127. Defendant Celina Independent School District is a public school within the meaning of the Act because it is “an independent school district or open-enrollment charter school.” *See* Tex. Civ. Prac. & Rem. Code § 118.001(1).

128. Defendant Dr. Maglisceau was a “professional school employee” because at all times described herein, she served as the Celina ISD Superintendent, making him “a superintendent or administrator serving as educational leader and chief executive officer of the school, principal or equivalent chief operating officer, teacher, including a substitute teacher, supervisor, social worker, school counselor, nurse, and teacher’s aide employed by a public school, and any other person employed by a public school whose employment requires certification and the exercise of discretion.” *See* Tex. Civ. Prac. & Rem. Code § 118.001(2).

129. The acts or omissions complained of herein were committed by the professional school employee, Defendant Dr. Maglisceau, against students enrolled in the school, the minor Roe Plaintiffs above described, and the acts or omissions constituted failure to report suspected child abuse or neglect under Tex. Fam. Code § 261.101.”

130. The acts or omissions constituted “failure to report suspected child abuse or neglect under Tex. Fam. Code § 261.101” because Defendant Dr. Maglisceau had a reasonable cause to believe that a child’s physical or mental health or welfare had been adversely affected by abuse or neglect by Defendant Caleb Elliott. *See* Tex. Fam. Code § 261.101(a).

131. The acts or omissions constituted “failure to report suspected child abuse or neglect under Tex. Fam. Code § 261.101” because Defendant Dr. Maglisceau had reasonable cause to believe that a child had been abused or neglected or may be abused or neglected, or that a child was a victim of an offense under Section 21.11, Penal Code, and had reasonable cause to believe that the child has been abused as defined by Section 261.001, including:

(A) mental or emotional injury to a child that results in an observable and material impairment in the child's growth, development, or psychological functioning;

(B) causing or permitting the child to be in a situation in which the child sustains a mental or emotional injury that results in an observable and material impairment in the child's growth, development, or psychological functioning;

(E) sexual conduct harmful to a child's mental, emotional, or physical welfare, including conduct that constitutes the offense of continuous sexual abuse of young child or disabled individual under Section 21.02, Penal Code, indecency with a child under Section 21.11, Penal Code, improper relationship between educator and student under Section 21.12, Penal Code, sexual assault under Section 22.011, Penal Code, or aggravated sexual assault under Section 22.021, Penal Code;

(F) failure to make a reasonable effort to prevent sexual conduct harmful to a child;

(H) causing, permitting, encouraging, engaging in, or allowing the photographing, filming, or depicting of the child if the person knew or should have known that the resulting photograph, film, or depiction of the child is obscene as defined by Section 43.21, Penal Code, or pornographic;

132. Plaintiffs affirmatively plead that the governmental immunity of Defendant Celina Independent School District is waived, and the official immunity of Defendant William Caleb

Elliott, Bill Elliot, Allison Ginn, and Dr. Maglisceau is abolished, to the extent either party is liable under the Act.

**B. FAILURE TO REPORT PURSUANT TO TRCP 118.002
(Against Defendants Bill Elliott, Allison Ginn, and Dr. Maglisceau)**

133. TRCP 118.002 requires that “In an action against a public school under this chapter, the professional school employee who committed the act or omission on which the claim is based must be named as a defendant.” Tex. Civ. Prac. & Rem. Code § 118.002(b)

134. As described herein, Plaintiffs have alleged that Celina ISD is liable under the Act for the failure of Defendants Bill Elliott, Allison Ginn, and Dr. Maglisceau to report suspected child abuse or neglect under Section 261.101, Family Code. *See* Tex. Civ. Prac. & Rem. Code § 118.002(a)(2)

135. Texas law requires that “a person having reasonable cause to believe that a child's physical or mental health or welfare has been adversely affected by abuse or neglect by any person shall immediately make a report as provided by this subchapter. Tex. Fam. Code § 261.101.”

136. Texas law also requires a “professional” to immediately make a report “if a professional has reasonable cause to believe that a child has been abused or neglected or may be abused or neglected, or that a child is a victim of an offense under Section 21.11, Penal Code, and the professional has reasonable cause to believe that the child has been abused as defined by Section 261.001. *Id.*

137. Defendants Bill Elliott, Allison Ginn, and Dr. Maglisceau are “professionals” as defined by Tex. Fam. Code § 261.101(b) because they are individuals who are “licensed or certified by the state or who is an employee of a facility licensed, certified, or operated by the state

and who, in the normal course of official duties or duties for which a license or certification is required, has direct contact with children.”

138. Plaintiffs are the types of victims the statute seeks to protect, and Plaintiffs’ injuries are the type of injuries the statute seeks to prevent.

139. For the reasons described herein, Defendants Bill Elliott, Allison Ginn, and Dr. Maglisceau had reasonable cause to believe that a child’s, including Plaintiffs’, physical or mental health or welfare had been adversely affected by abuse or neglect.

140. For the reasons described herein, Defendants Bill Elliott, Allison Ginn, and Dr. Maglisceau knew or had reasonable cause to suspect that Caleb Elliott and/or others on behalf of Defendant Celina ISD had abused children as defined by Section 261.001 and discussed herein, including but not limited to:

(A) mental or emotional injury to a child that results in an observable and material impairment in the child's growth, development, or psychological functioning;

(B) causing or permitting the child to be in a situation in which the child sustains a mental or emotional injury that results in an observable and material impairment in the child's growth, development, or psychological functioning;

(E) sexual conduct harmful to a child's mental, emotional, or physical welfare, including conduct that constitutes the offense of continuous sexual abuse of young child or disabled individual under Section 21.02, Penal Code, indecency with a child under Section 21.11, Penal Code, improper relationship between educator and student under Section 21.12, Penal Code, sexual assault under Section 22.011, Penal Code, or aggravated sexual assault under Section 22.021, Penal Code;

(F) failure to make a reasonable effort to prevent sexual conduct harmful to a child;

(H) causing, permitting, encouraging, engaging in, or allowing the photographing, filming, or depicting of the child if the person knew or should have known that the resulting photograph, film, or depiction of the child is obscene as defined by Section 43.21, Penal Code, or pornographic;

141. Defendants Bill Elliott, Allison Ginn, and Dr. Maglisceau willfully and knowingly failed to report such abuse and, therefore, were in violation of Tex. Fam. Code § 261.101.

142. Defendants Bill Elliott, Allison Ginn, and Dr. Maglisceau willfully and knowingly failed to report such abuse and, therefore, were also negligent per se.

143. Defendants Bill Elliott, Allison Ginn, and Dr. Maglisceau's conduct was grossly negligent, in that, when viewed objectively from the standpoint of Defendants Bill Elliott, Allison Ginn, and Dr. Maglisceau at the time of the act or omission, the conduct involved an extreme degree of risk, considering the probability and magnitude of the potential harm to others, and in that Defendants Bill Elliott, Allison Ginn, and Dr. Maglisceau had actual, subjective awareness of the risk involved, but, nevertheless, proceeded with conscious indifference to the rights, safety, and welfare of others, including Plaintiffs.

144. Defendants' Bill Elliott, Allison Ginn, and Dr. Maglisceau failure to report the abuse caused Plaintiffs to suffer injury and damages by being or continuing to be abused, for which Defendants are liable.

C. INTRUSION UPON SECLUSION (Against William Caleb Elliott)

145. Defendant Caleb Elliott intentionally intruded on the private affairs and seclusion of the minor Plaintiffs by secretly imaging them with his phone and by placing or using cameras in the boys' locker room and shower areas, without consent, while the children were nude or

changing. Caleb Elliott also intruded upon Plaintiffs' privacy by deliberately and intensely watching the boys while nude or bathing, for voyeuristic purposes.

146. Defendant Caleb Elliott's actions constituted sexual abuse under numerous sections of the Texas Penal Code, including but not limited to:

- a. § 21.02(c)(6). Continuous Sexual Abuse of Young Child or Disabled Individual;
- b. § 21.11(a)(2)(B). Indecency with a Child by Causing the Child to Expose the Child's Anus or Any Part of the Child's Genitals;
- c. § 21.15. Invasive Visual Recording in a Changing Room;
- d. § 21.17. Voyeurism;
- e. § 21.18. Sexual Coercion;
- f. § 21.19 – Unlawful Electronic Transmission of Sexually Explicit Visual Material;
- g. § 43.25. Sexual Performance by a Child.

147. These intentional intrusions occurred in a place and under circumstances where Plaintiffs had a reasonable expectation of privacy and would be highly offensive to any reasonable person. Caleb Elliott's actions are especially egregious because Elliott was not a bystander or a stranger. He was a coach and teacher—an adult granted access precisely because he was supposed to protect the boys. But instead of protecting and mentoring, Caleb Elliott abused his authority and betrayed Plaintiffs' trust for his own perverse purposes. No reasonable community would tolerate such conduct from anyone, least of all from the educator charged with the boys' safety.

148. Caleb Elliott's intrusions proximately caused Plaintiffs' damages, including severe emotional distress, mental anguish, and loss of dignity and privacy.

**D. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(Against William Caleb Elliott)**

149. Defendant Caleb Elliott's conduct was intentional. Caleb Elliott deliberately and secretly recorded nude and partially clothed boys in the Moore Middle School locker room and showers.

150. Defendant Caleb Elliott's actions constituted sexual abuse under numerous sections of the Texas Penal Code, including but not limited to:

- a. § 21.02(c)(6). Continuous Sexual Abuse of Young Child or Disabled Individual;
- b. § 21.11(a)(2)(B). Indecency with a Child by Causing the Child to Expose the Child's Anus or Any Part of the Child's Genitals;
- c. § 21.15. Invasive Visual Recording in a Changing Room;
- d. § 21.17. Voyeurism;
- e. § 21.18. Sexual Coercion;
- f. § 21.19 – Unlawful Electronic Transmission of Sexually Explicit Visual Material;
- g. § 43.25. Sexual Performance by a Child.

151. Defendant Caleb Elliott's conduct was extreme and outrageous. As recognized by the Texas Penal Code, secretly imaging children and surveilling them in the showers are acts beyond all bounds of decency. Caleb Elliott's actions are rightfully regarded as atrocious and utterly intolerable in a civilized society.

152. Defendant's conduct proximately caused severe emotional distress to Plaintiffs. Since learning what happened, the boys have suffered sleep disturbance, anxiety, school avoidance, withdrawal from athletics, and panic in public changing and bathing facilities; they have begun or will begin trauma-informed therapy. These harms were the natural and foreseeable result of Elliott's intentional violations of their bodily privacy.

E. UNLAWFUL DISCLOSURE OF INTIMATE VISUAL MATERIAL UNDER TCPRC CHAPTER 98B AGAINST WILLIAM CALEB ELLIOTT

153. Defendant Caleb Elliott created intimate visual material depicting minor Plaintiffs' intimate areas in a school locker room and showers where they had a reasonable expectation of privacy and without their effective consent.

154. On information and belief, Caleb Elliott disclosed that intimate visual material—by transferring, sharing, syncing, backing up, or otherwise disseminating it—without the depicted minors' consent and with the intent to harm them, or at minimum with knowledge that disclosure would cause them harm. Caleb Elliott knew the material was obtained and created in circumstances in which the minors expected not to be recorded.

155. The disclosure of the intimate visual material directly or indirectly reveals the identity of Plaintiffs.

156. The disclosure caused harm to the minors, including severe emotional distress, humiliation, and loss of dignity, as well as disruption of their schooling and activities.

VIII. ATTORNEY'S FEES & COSTS

157. Plaintiffs are entitled to court costs and reasonable and necessary attorney's fees as provided for under Tex. Civ. Prac. & Rem. Code § 118.004.

IX. CONDITIONS PRECEDENT

158. All conditions precedent to Plaintiffs' claims for relief have been performed or have occurred. Pursuant to Tex. Ed. Code 22.0513, Plaintiffs provided proper notice to Defendants Bill Elliott, Allison Ginn, and Dr. Thomas Maglisceau on October 27, 2025.

X. DAMAGES

159. As a direct and proximate result of Defendants' gross negligence and intentional conduct, Plaintiffs have sustained bodily injuries and incurred expenses for the necessary medical

care of those injuries and in reasonable probability will incur future medical expenses. This particular pleading of damages is expressly limited to psychological conditions above and beyond ordinary mental anguish which require psychotherapeutic and/or psychiatric counseling, i.e., “medical expenses.” These charges are reasonable, customary, and prevailing charges for the services rendered in the county in which they were rendered.

160. Plaintiffs have also sustained physical pain and mental anguish and in reasonable probability, will continue to sustain physical pain and mental anguish into the future.

161. Plaintiffs have also sustained physical impairment and in reasonable probability, will continue to sustain physical impairment into the future.

162. Plaintiffs have also sustained an invasion of privacy.

163. Plaintiffs have also sustained an injury to reputation.

164. Plaintiffs’ injuries resulted from Defendants Dr. Maglisceau’s, Allison Ginn’s, and Bill Elliott’s gross negligence and Defendant Elliott’s malice, which entitles Plaintiffs to exemplary damages as to these Defendants under Texas Civil Practice & Remedies Code section 41.003(a)(2) and (3). In particular, Defendant William Caleb Elliott possessed the specific intent to cause substantial injury or harm to Plaintiffs, by exploiting their trust as students and athletes under his tutelage to intrude upon their nudity and bathing, causing severe mental anguish. See Tex. Civ. Prac. & Rem. Code § 41.001(7).

165. The conduct, acts, and omissions of the Defendants described herein constitute gross negligence. This conduct, when viewed objectively, involved an extreme degree of risk, considering the probability and magnitude of the potential harm to others. Defendants were subjectively aware of the risk involved, but nevertheless proceeded with conscious indifference to the rights, safety, and welfare of others, including Plaintiffs. Further, Defendant Celina ISD is

liable for their employees' conduct because (1) a principal of Defendant Celina ISD authorized the doing and manner of the act; (2) the Defendant employee was unfit and Celina ISD acted with malice in employing or retaining him; (3) the Defendant employee was employed in a managerial capacity and was acting in the scope of his employment; and/or (4) Defendant Celina ISD or a manager of Celina ISD ratified or approved the act. This conduct amounted to gross negligence under Chapter 41 of the Texas Civil Practice and Remedies Code. Plaintiffs are therefore entitled to recover judgment against Defendants for exemplary damages.

166. Plaintiffs are entitled to seek exemplary damages without limitation because Defendant Caleb Elliot's acts constitute an intentional and/or knowing violation of Texas Penal Code §§ 22.04(a)(2) (Injury to a Child), 21.02(a) (Continuous Sexual Abuse of a Young Child), 21.11(a)(2)(B) (Indecency With a Child), and/or 43.25(b) and/or (d) (Sexual Performance by a Child). Defendant Caleb Elliott's knowing and/or intentional conduct includes but is not limited to:

- a. Placing hidden cameras in a space where young boys undressed, showered, and stood naked;
- b. Using his position of authority, trust, and supervision to gain access to the middle-school-boys' locker room on multiple occasions;
- c. Entering the boys' locker room for the undisclosed and illicit purpose of viewing, photographing, and or videotaping young boys in a state of undress or nude;
- d. Positioning himself near the showers and changing areas in the boys' locker room;
- e. Positioning his cell phone so the camera lens pointed outward toward young boys as they showered, undressed, and changed;
- f. Aiming his cell phone directly at young boys' buttocks and genitals; and

g. Repeatedly photographing and/or videotaping young boys while they were in a state of undress or nude without their consent; and

h. Causing serious mental injury to children 14 years of age or younger.

167. Defendant Caleb Elliott's intentional and/or knowing acts and/or omissions—which Defendant Celina ISD is vicariously liable—are the direct and proximate cause of the injuries sustain by Plaintiffs who were under the age of 14 at the time of some of the events described herein.

168. Moreover, Plaintiffs are entitled to seek exemplary damages without limitation because Defendants Dr. Maglisceau's, Allison Ginn's, and Bill Elliott's acts constitute an intentional and/or knowing violation of Texas Penal Code §§ 22.04(a)(2)(b)(1) (Injury to a Child). These Defendants' knowing and/or intentional conduct includes but is not limited to:

a. Assuming the care, custody, or control of children 14 years of age or younger, including Roe Plaintiffs;

b. Failing to make a report under pursuant to Tex. Fam. Code § 261.101 despite having a legal and/or statutory obligation to do so;

c. Allowing a known sexual predator to have unsupervised access to children 14 years of age or younger; and

d. Causing serious mental injury to children 14 years of age or younger.

169. Defendant Dr. Maglisceau's, Allison Ginn's, and Bill Elliott's intentional and/or knowing acts and/or omissions—which Defendant Celina ISD is vicariously liable—are the direct and proximate cause of the injuries sustain by Plaintiffs who were 14 years of age or younger at the time of the events described herein.

XI. JURY DEMAND

170. Plaintiff hereby makes a request for a jury in accordance with the Texas Rules of Civil Procedure. The jury fee will be paid simultaneously with this request or has previously been paid.

XII. RULE 193.7 NOTICE

171. Pursuant to TEX. R. CIV. P. 193.7, Plaintiff hereby gives actual notice to Defendants that any and all documents produced in discovery in this action may be used against them at any pre-trial proceeding and/or at the trial of this matter without the necessity of authenticating said documents.

XIII. PRAYER

Wherefore, premises considered, Plaintiff respectfully requests that Defendants be cited to appear and answer, and on final trial, that Plaintiffs have judgment against any or all Defendants for:

- a. Actual, economic and non-economic damages, including all compensatory damages, as pleaded including:
 - i. Past and future pain and suffering;
 - ii. Past and future medical expenses, including mental health care;
 - iii. Past and future mental anguish;
 - iv. Past and future physical impairment;
 - v. invasion of privacy;
 - vi. injury to reputation;
- b. Exemplary or punitive damages;
- c. Prejudgment and post judgment interest as allowed by law;
- d. Attorney's Fees and Costs of suit; and

- e. Any further relief, either in law or equity, to which Plaintiff is justly entitled.

Respectfully submitted,

/s/Ross E. Leonoudakis

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Filing Code Description: Plaintiff's Original Petition (OCA)
Filing Description: Plaintiffs' Original Petition
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Case Contacts

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