

vs.

**CELINA INDEPENDENT SCHOOL
DISTRICT and WILLIAM “CALEB”
ELLIOTT**

Defendants,

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_____ **JUDICIAL DISTRICT**

PLAINTIFFS’ ORIGINAL PETITION

Plaintiffs John Doe I and Jane Doe I, individually, and as next friends of Johnny Doe I, John Doe II and Jane Doe II, individually, and as next friends of Johnny Doe II, John Doe III and Jane Doe III, individually, and as next friends of Johnny Doe III, John Doe IV, individually, and as next friend of Johnny Doe IV, Jane Doe V, individually, and as next friend of Johnny Doe V, Jane Doe VI, individually, and as next friends of Johnny Doe VI, John Doe VII and Jane Doe VII, individually, and as next friends of Johnny Doe VII, John Doe VIII and Jane Doe VIII, individually, and as next friends of Johnny Doe VIII, John Doe IX and Jane Doe IX, individually, and as next friends of Johnny Doe IX, John Doe X and Jane Doe X, individually, and as next friends of Johnny Doe X, John Doe XI and Jane Doe XI, individually, and as next friends of Johnny Doe XI, John Doe XII and Jane Doe XII, individually, and as next friends of Johnny Doe XII, Jane Doe XIII, individually, and as next friends of Johnny Doe XIII, John Doe XIV and Jane Doe XIV, individually, and as next friends of Johnny Doe XIV, John Doe XV and Jane Doe XV, individually, and as next friends of Johnny Doe XV, John Doe XVI and Jane Doe XVI, individually, and as next friends of Johnny Doe XVI, John Doe XVII and Jane Doe XVII, individually, and as next friends of Johnny Doe XVII file this Original Petition, complaining of Defendants Celina Independent School District and William “Caleb” Elliott, and for cause of action, state the following:

I.

SUMMARY

Parents have a justifiable expectation that their school district will make all reasonable efforts to protect the young, vulnerable students entrusted by those parents into the care of the district from sexual predators. That is particularly true when it comes to known predators *who are employed by the district*. This lawsuit is about seeking accountability for Celina ISD's willful failure to protect its young students from a known predator, Caleb Elliott, who was employed by the district. Instead of protecting its students from Caleb Elliott, Celina ISD district gave him unfettered access to locker rooms with naked boys in the shower. Celina ISD gave Elliott continued access to its vulnerable students even in the face of repeated red flags – red flags that would have put *any* reasonable school district on notice that its students were in predictable, obvious, and preventable danger. This danger culminated in the invasive photographic and video recording of young children in a private space by a young football coach for his own gratification. This apparently occurred because Celina ISD placed a higher priority on athletic success than it placed on protecting the vulnerable young students entrusted into the care and protection of the district.

II.

DISCLOSURE OF EARLIER FILED CASES ARISING OUT OF SAME TRANSACTION OR OCCURRENCE

Pursuant to Collin County Local Rules 2.3, Plaintiffs disclose the following earlier filed cases arising out of the same occurrence made the basis of this suit:

Doe Families I-III. v. Celina Independent School District, et. al., Cause No. 471-08453-2025, in the 471st District Court of Collin County, Texas;

John Roe I, a minor, by and through his parent and next friend, Jane Roe I, et. al. v. Celina Independent School District, et. al., Cause No. 471-08602-2025, in the 471st District Court of Collin County, Texas;

Jane I and John Doe I, Individually and as next friend of Johnny Doe I, a Minor, et. al. v. Celina Independent School District, et. al.; Cause No. 471-09339-2025, in the 471st District Court of Collin County, Texas.

III.

MOTION TO PROCEED UNDER PSEUDONYMS

1. Plaintiffs are parents of their minor children, who are victims of the acts described herein. Due to extreme privacy concerns and the highly sensitive and personal nature of this matter, Plaintiffs are identified by pseudonyms to protect their identities, consistent with the intent of Texas Rule of Civil Procedure 21(c). Plaintiffs' identities will be made known to Defendants through their counsel of record as counsel appear subject to strict confidentiality protections for the victims involved.

2. Plaintiffs further request an Order from the Court that instructs the parties that throughout the pendency of this case the parties: (a) use a confidentiality designation for documents that could reveal Plaintiffs' identities; (b) redact personally identifying information from public filings; and (c) refer to the minor-Plaintiffs as "Johnny Doe I" and Johnny Doe II" and their parents as specified in the case caption, to non-party witnesses by initials or other appropriate protected designation in depositions and public transcripts, and that at trial the Court implement measures to protect the minor Plaintiffs, other minor victims and their parents' identities in open court, including limiting public disclosure of identifying details.

IV.

DISCOVERY CONTROL PLAN

3. Pursuant to Rules 190.1 and 190.3 of the Texas Rules of Civil Procedure, Plaintiffs state that discovery in this cause is intended to be conducted under **Level 3**.

V.

JURY DEMAND

4. Pursuant to Rules 216 and 217 of the Texas Rules of Civil Procedure, Plaintiffs request a jury trial of this matter. Plaintiffs tendered the proper jury fee with the filing of Plaintiffs' Original Petition.

VI.

RULE 47 STATEMENT OF MONETARY RELIEF SOUGHT

5. Plaintiffs prefer to have the jury determine the fair amount of compensation for Plaintiffs' damages, and Plaintiffs place the decision regarding the amount of compensation to be awarded in the jury's hands. Rule 47 of the Texas Rule of Civil Procedure, however, *requires* Plaintiffs to provide a statement regarding the amount of monetary relief sought. Accordingly, Plaintiffs state that monetary relief of over \$1,000,000, in an amount to be determined by the jury, is being sought.

VII.

REQUIRED INITIAL DISCLOSURES DUE 30 DAYS AFTER ANSWER

6. Please be advised that amended Texas Rule of Civil Procedure 194 now requires each defendant automatically to serve required initial disclosures upon Plaintiffs within thirty days of filing an answer to this Petition, without any discovery request being served by Plaintiffs. Rule 194 now requires the following to be disclosed in each party's required initial disclosures:

- (1) the correct names of the parties to the lawsuit;
- (2) the name, address, and telephone number of any potential parties;
- (3) the legal theories and, in general, the factual bases of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial);
- (4) the amount and any method of calculating economic damages;
- (5) the name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case;

(6) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the responding party has in its possession, custody, or control, and may use to support its claims or defenses, unless the use would be solely for impeachment.

(7) any indemnity and insuring agreements described in rule 192.3(f);

(8) any settlement agreements described in Rule 192.3(g);

(9) any witness statements described in Rule 192.3(h);

(10) in a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records or bills;

(11) in a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party; and

(12) the name, address, and telephone number of any person who may be designated as a responsible third party.

VIII.

REQUEST FOR DEPOSITIONS

7. Plaintiffs request dates from Defendants for the depositions of: 1) William “Caleb” Elliott, 2) William “Caleb” Elliott’s father, “Bill Elliott,” 3) any and all employees or agents of the Celina Independent School District who were involved in any way in the decision-making concerning the hiring, disciplining, or continued retention of William “Caleb” Elliott during his employment with Celina ISD, 4) any and all employees or agents of the Celina Independent School District who received any verbal, written or electronic report(s) of the use of photography by William “Caleb” Elliott on the premises of any Celina ISD school during his employment with Celina ISD, 5) any and all employees or agents of the Celina Independent School District who received any verbal, written or electronic complaint regarding William “Caleb” Elliott during his employment with Celina ISD, including but not limited to any report of potentially inappropriate photography,

sexual conduct, or behavior, 6) any and all employees or agents of the Celina Independent School District who were involved any way in the decision-making concerning the transfer of William “Caleb” Elliott between one or more Celina ISD school campuses, 7) any and all employees or agents of the Celina Independent School District who had any knowledge of any potential romantic and/or sexual relationship between William “Caleb” Elliott and any current or former Celina ISD student, 8) Celina ISD’s agent and/or employee with the most knowledge concerning Defendants’ policies and procedures regarding photography of students in locker rooms and elsewhere, and 9) Celina ISD’s agent and/or employee with the most knowledge concerning Defendants’ policies and procedures regarding personal relationships between Celina ISD employees and students of Celina ISD.

IX.

PARTIES

8. Plaintiffs John Doe I and Jane Doe I are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe I.
9. Plaintiffs John Doe II and Jane Doe II are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe II.
10. Plaintiffs John Doe III and Jane Doe III are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe III.
11. Plaintiff John Doe IV is an individual residing in Collin County. He appears as next friend of his minor son, Johnny Doe IV.
12. Plaintiff Jane Doe V is an individual residing in Collin County. She appears as next friend of her minor son, Johnny Doe V.
13. Plaintiff Jane Doe VI is an individual residing in Collin County. She appears as next friend of her minor son, Johnny Doe VI.

14. Plaintiffs John Doe VII and Jane Doe VII are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe VII.
15. Plaintiffs John Doe VIII and Jane Doe VIII are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe VIII.
16. Plaintiffs John Doe IX and Jane Doe IX are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe IX.
17. Plaintiffs John Doe X and Jane Doe X are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe X.
18. Plaintiffs John Doe XI and Jane Doe XI are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe XI.
19. Plaintiffs John Doe XII and Jane Doe XII are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe XII.
20. Plaintiff Jane Doe XIII is an individual residing in Collin County. She appears as next friend of her minor son, Johnny Doe XIII.
21. Plaintiffs John Doe XIV and Jane Doe XIV are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe XIV.
22. Plaintiffs John Doe XV and Jane Doe XV are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe XV.
23. Plaintiffs John Doe XVI and Jane Doe XVI are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe XVI.
24. Plaintiffs John Doe XVII and Jane Doe XVII are individuals residing in Collin County. They appear as next friends of their minor son, Johnny Doe XVII.
25. Defendant Celina Independent School District is an independent school district located in Collin County, Texas. It may be served with citation by serving its agent:

**Thomas Albert Maglisceau
Celina ISD
205 S. Colorado Street
Celina, Texas 75009**

26. Defendant William “Caleb” Elliott (“Caleb Elliott”) is an individual residing in Collin County, in the State of Texas. He may be served with process by serving:

**William Caleb Elliott
3913 Milo Drive
McKinney, Texas 75071**

X.

VENUE AND JURISDICTION

27. Venue is proper in this Court by virtue of sections 15.001 et. seq. of the Texas Civil Practice & Remedies Code because the cause of action which is the basis of this case arose in whole or in part in this county, and/or one or more Defendant’s residence or principal office is in this county. This Court has jurisdiction because Plaintiffs’ damages are within the jurisdictional limits of this County.

XI.

FACTS

28. Defendant Caleb Elliott is the son of legendary Celina ISD football coach, Bill Elliott. Bill Elliott succeeded Celina’s celebrated football coach of over forty years, Gary Autry (G.A.) Moore, Jr. in 2012. Autry had led the Celina Bobcats to the longest winning streak in high school football history, one of the feats that led to Autry’s induction into the Texas Sports Hall of Fame as “All Time Winningest Coach.” Bill Elliott appeared to be continuing Moore’s tradition of excellence and faith-based coaching when he led the Celina Bobcats to win a Texas high school football championship in 2024. But beneath this veneer of success, a known predator was operating with impunity.

29. As the years passed, Bill Elliott had brought Caleb Elliott and one other son onto his coaching staff at Celina High School. During the 2022-23 school year, Caleb Elliott worked at the high school as a substitute teacher and coach.

30. Upon information and belief, during the time that Caleb Elliott worked at Celina High School, he began an inappropriate sexual relationship with an underaged teenaged student. Such a relationship would constitute a crime under Sections 21.12 et seq of the Texas Penal Code.

31. Upon information and belief, Celina ISD discovered the inappropriate sexual relationship with the underaged teenaged male student, but the district did not terminate Caleb Elliott's employment with the district. It appears the district placed a higher priority on advancing its championship football program than it placed on protecting the vulnerable young students entrusted to the district.

32. Upon information and belief, Celina ISD did not report the inappropriate sexual relationship to the criminal authorities. Again, it appears the district placed a higher priority on advancing its championship football program than it placed on protecting the vulnerable young students entrusted to the district.

33. Upon information and belief, Celina ISD did not report the inappropriate sexual relationship with the underaged teenaged student to the State Board of Education for investigation and the potential loss of Caleb Elliott's teaching certificate. Again, it appears the district placed a higher priority on advancing its championship football program than it placed on protecting the vulnerable students entrusted to the district.

34. Instead of taking any action to report Caleb Elliott's illicit activities to anyone and to take Caleb Elliott away from vulnerable young students, the district simply moved Caleb Elliott to a Celina school with even younger, even more vulnerable students – Moore Middle School. There, the district empowered this known predator to be a social studies teacher and eighth grade football

coach. Again, it appears the district placed a higher priority on advancing its championship football program than it placed on protecting the vulnerable young students entrusted to the district.

35. Upon information and belief, at least one teacher at Moore Middle School reported that Caleb Elliott was behaving inappropriately towards children, but the district disregarded, minimized and ignored the report, and the reporting teacher left the district's employment as a result. Again, it appears the district placed a higher priority on advancing its championship football program than it placed on protecting the vulnerable young students entrusted to the district.

36. Upon information and belief, Caleb Elliott placed hidden cameras throughout the boys' locker room at Moore Middle School during the 2024-25 school year without the permission of any of the boys' parents.

37. Upon information and belief, upon learning that Caleb Elliott had placed hidden cameras throughout the boy's locker room, the district did not terminate Caleb Elliott, did not report his unlawful behavior to the police, and did not conduct the detailed investigation that was warranted under the circumstances. Instead, the district simply "banned" Caleb Elliott from the boys' locker room when students were present, but the district took no real steps to enforce the ban, and the district merely sent some apology letters to some parents. Most importantly, the district continued to allow a known predator to have access to naked young, vulnerable students. Again, it appears the district placed a higher priority on advancing its championship football program than it placed on protecting the vulnerable young students entrusted to the district.

38. Upon information and belief, the district was aware that Caleb Elliott was a homosexual male who would be supervising young boys in various states of undress in the locker room. The combination of Elliott's sexual attraction to males, his history of an inappropriate relationship with a male student, and his unsupervised access to vulnerable young boys in intimate settings created an obvious and foreseeable risk. Any district exercising reasonable care would have implemented

strict supervision protocols and safeguards. The district's failure to do so, particularly after learning of the hidden cameras, demonstrated a conscious disregard for student safety.

39. As the 2025-26 school year began, Caleb Elliott continued to have essentially unfettered access to the boys' locker room. Students witnessed Caleb Elliott photographing them as they showered and undressed. Caleb Elliott engaged not only in photography of naked, vulnerable young students, but also in forcing some of these students to engage in sexual performances in the locker room, such as performing naked jumping jacks and naked "burpees."

40. It was only after the families of some of these students reported Caleb Elliott's illicit activities to the police that anything was done to prevent Caleb Elliott's continued access to young, vulnerable students. The district acted only after its hand was *forced* by families of Celina students, law enforcement authorities, and the media. Again, it appears the district placed a higher priority on advancing its championship football program than it placed on protecting the vulnerable students entrusted to the district.

41. On or about September and October of 2025, Caleb Elliott committed multiple criminal offenses, including: 1) Invasive Visual Recording in violation of Section 21.15 of the Texas Penal Code, 2) Sexual Exploitation of Children in violation of sections 2251(a) and (c) of the Title 18 of the United States Code, and 3) Sexual Performance of a Child in violation of Section 43.26 of the Texas Penal Code.

42. On October 3, 2025, Caleb Elliott was arrested and charged with Invasive Visual Recording in violation of Section 21.15 of the Texas Penal Code. Section 118.001 of the Texas Civil Practice and Remedies Code explicitly recognizes this offense as an offense that waives Tort Claims Act immunity for school districts such as Celina ISD. Photos discovered on Caleb Elliott's cell phone confirmed what the district knew or should have known from the outset – Caleb Elliott was taking photographs of naked, underaged Celina students. Why was Caleb Elliott able to take these

pictures? Because the district continued to grant him unfettered access to these students long after any district genuinely committed to student safety would have intervened to protect its students.

43. Just 6 days later, on October 9, 2025, Caleb Elliott was again arrested and charged with Possession or Promotion of Child Pornography in violation of Section 43.26(d)(B) of the Texas Penal Code. Section 118.001 of the Texas Civil Practice and Remedies Code explicitly recognizes this offense as an offense that waives Tort Claims Act immunity for school districts such as Celina ISD.

44. By October 15, 2025, even the district could no longer ignore the inevitable consequences of its inactions. Superintendent Maglisceau and the district's Board of Trustees allowed Caleb Elliott to resign without being terminated in return for surrendering his teaching license.

45. On November 7, 2025, the third shoe dropped. Caleb Elliott was arrested for Sexual Performance of a Child in violation of Section 43.26 of the Texas Penal Code for requiring a naked minor to perform jumping jacks in the Moore Middle School locker room. Section 118.001 of the Texas Civil Practice and Remedies Code explicitly recognizes this offense as an offense that waives Tort Claims Act immunity for school districts such as Celina ISD.

CAUSES OF ACTION

XII.

GROSS NEGLIGENCE UNDER CHAPTER 118 OF THE TEXAS CIVIL PRACTICE AND REMEDIES CODE

46. Under Chapter 118 of the Texas Civil Practice and Remedies Code (the "Act"), Defendants' governmental and official immunity is waived for professional school employees for sexual misconduct.

47. 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 the district liable for an act or omission that is committed by the employee against a student enrolled in the school and that is sexual misconduct as defined by the Act or failure to report suspected child abuse or neglect under Section 261.101, Family Code. Tex. Civ. Prac. & Rem. Code § 118.002(a).

48. In particular, Defendant Celina Independent School District's conduct, as a body corporate or by way of its agents or employees: 1) in continuing to employ Elliott after the discovery of an improper relationship, 2) moving Elliott to the employ of the middle school after that discovery, 3) banning, but not firing Elliott after the discovery of hidden cameras in the middle school locker room, 4) insufficiently supervising Elliott's interactions with young boys including the minor Doe Plaintiffs in the locker room after all of the above was made known to the ISD through the failure to implement the use of two-deep leadership, 5) 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, 6) acquiescing to Elliott's presence in the locker room, whether or not he was banned, and 7) failing to report Elliott's conduct to parents, supervisors, administrators, the principal, the superintendent, and the board of trustees to enable any or all of them to pass upon his continued employment, 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, in its knowledge of Elliott's improper teacher-student relationship and hidden camera recording, but, nevertheless, proceeded with conscious indifference to the rights, safety, and welfare of others, including Plaintiffs.

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

which Plaintiffs suffered as a result, because, if Defendant Celina Independent School District had undertaken any of these preventative measures including criminal complaint or termination, Plaintiffs would not have been subject to the sexual exploitation, invasive visual recording, and emotional trauma they endured.

50. In further satisfaction of the Act's requirements for liability, this suit under the Act against the public school district, Defendant Celina Independent School District, has 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).

51. 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).

52. 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. Tex. Civ. Prac. & Rem. Code § 118.001.

53. 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 Doe Plaintiffs above described, and the acts or omissions constituted sexual conduct.

54. 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:

--§ 21.02(c)(6). Continuous Sexual Abuse of Young Child or Disabled Individual;

--§ 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;

--§ 21.15. Invasive Visual Recording in a Changing Room;

- § 21.17. Voyeurism;
- § 21.18. Sexual Coercion; and
- § 43.25. Sexual Performance by a Child.

55. Plaintiffs affirmatively plead that the governmental immunity of Defendant Celina Independent School District is waived, and the official immunity of Defendant William Caleb Elliott is abolished, to the extent either party is liable under the Act. *See* Tex. Civ. Prac. & Rem. Code § 118.006.

XIII.

INTRUSION UPON SECLUSION – DEFENDANT CALEB ELLIOTT

56. Defendant William Caleb Elliott intentionally intruded on the minor Doe Plaintiffs’ private affairs when he surreptitiously imaged the children, by handheld camera and/or by hidden camera, by photograph and/or videotape, without their consent while the children were in various states of undress, changing and bathing in the changing areas and showers of the Moore Middle School boys’ locker room.

57. Defendant William Caleb Elliott intruded on the minor Doe Plaintiffs’ private affairs separate and apart from imaging them by deliberately, prolongedly, and intensely observing them nude, bathing, undressing, and changing therein, for the purpose of his own prurient interest, activity constituting criminal voyeurism of a minor, a state jail felony. *See* Tex. Penal Code § 21.17.

58. Defendant William Caleb Elliott intruded on the private affairs of minor plaintiffs by demanding sexual performances, including the performance of nude jumping jacks, before allowing them to regain possession of their belongings -- activities constituting inducement of sexual performance by a child, a felony of the second degree, *see* Tex. Penal Code § 43.25(b), and

potentially sexual coercion, *see* Tex. Penal Code § 21.18.

59. The intrusion was a kind that would be highly offensive to a reasonable person, in that a reasonable person would not expect to be secretly imaged in a locker room, in changing areas, or in the shower, without their consent, by their own coach/educator to whose care they were entrusted, and this would shock and offend such reasonable person's sense of decency, trust, privacy, and personal agency.

60. Each of such intentional acts, singularly or in combination with others, constituted an invasion of Plaintiffs' privacy in the form of intrusion upon seclusion.

XIV.

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS – DEFENDANT WILLIAM CALEB ELLIOTT

61. Defendant William Caleb Elliott imaged the minor Doe Plaintiffs, as described above, without their consent or knowledge, knowing that he did not have those Plaintiffs' consent, nor would he, had he sought it.

62. Moreover, as children, the minor Doe Plaintiffs lacked the capacity to give effective consent to be recorded nude and undressed if they were even asked, which they were not, if they even wished, which they did not.

63. Defendant William Caleb Elliott also induced and compelled the above-described sexual performance of minor John Doe plaintiffs.

64. Defendant William Caleb Elliott knew that such behavior would subject Plaintiffs to severe emotional distress, because he knew that the ongoing recording of Plaintiffs, nude, changing, and bathing as minors, and the compelled sexual performance of minor John Doe Plaintiffs, would traumatize Plaintiffs and forever make the boys, in their own minds, as victims of a child predator, incapacitating the children from growing into psychologically healthy and productive adult men

capable of forming normal romantic and sexual relationships.

65. Defendant William Caleb Elliott's conduct was extreme and outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, as to be regarded as atrocious and utterly intolerable in a civilized community. In particular, the conduct should be outrageous because Defendant Elliott sought to be, and was, entrusted with the safety of young boys *ex officio* his position as coach, and violated that trust for the shortsighted and selfish purpose of his own arousal and sexual gratification. Beyond doubt, Defendant Elliott's conduct was not only *theoretically* outrageous, but the portions of it made known to the public *actually outraged* the community of Celina, Texas, as evidenced by the public outcry following the arrest of Defendant Elliott, as seen in the public comments made at a school board meeting and on social media platforms, for example.

66. Plaintiffs' resulting emotional distress has been severe in that, since learning that the minor Doe Plaintiffs have been sexually victimized and imaged, Plaintiffs have difficulty sleeping, attending school, continuing their athletics participation, and using public changing and bathing facilities as before.

67. Many of the minor Doe Plaintiffs have begun, or will imminently begin psychotherapeutic counseling to process the events described herein and to attempt to mitigate their intolerable distress and the potential welling up of posttraumatic stress.

68. Each of Defendant William Caleb Elliott's intentional acts, singularly or in combination with others, constituted intentional infliction of emotional distress, which proximately caused Plaintiffs' severe mental pain and anguish.

XV.

**UNLAWFUL DISCLOSURE OF INTIMATE VISUAL MATERIAL –
CHAPTER 98B CIVIL PRACTICE AND REMEDIES CODE– CALEB ELLIOTT**

69. Defendant Caleb Elliott created intimate visual material depicting the minor plaintiffs' intimate areas in a locker room and showers where the minors had a reasonable expectation of privacy and without their effective consent.

70. Upon information and belief, Defendant Elliott disclosed this material by transferring, sharing, syncing, backing up, or otherwise disseminating it without consent, and with intent to harm and/or with knowledge that these disclosures would cause harm, knowing they were obtained in circumstances where the minors expected not to be recorded.

71. The disclosure directly, or indirectly reveals the minors' identities.

72. The disclosure has caused, or will cause harm, including severe emotional distress, humiliation, loss of dignity, and disruption of schooling and activities.

XVI.

ATTORNEYS' FEES AND COSTS

73. All Conditions precedent to Plaintiffs' right to recover have been performed, or will be performed.

74. Plaintiffs are entitled to reasonable and necessary attorneys' fees under Section 118.004 of the Texas Civil Practice and Remedies Code.

XVII.

DAMAGES

75. As a result of Defendants' actions, Plaintiffs suffered severe bodily, economic, and mental injuries. Consequently, Plaintiffs seek the following damages:

1. Medical Expenses: Plaintiffs have incurred bodily injuries which were caused by the incident in question. Plaintiff has incurred medical expenses in the past and will continue to incur them in the future.
2. Physical Pain: Plaintiffs have endured physical pain in the past and will endure pain in the future.
3. Mental Anguish: Plaintiffs have endured mental anguish in the past and will endure mental anguish in the future.
4. Loss of Earning Capacity: Plaintiffs will suffer a loss of earning capacity in the future.
5. Impairment: Plaintiff have endured physical impairment in the past, and will continue to suffer the effects in the future.

76. In all reasonable probability, Plaintiffs will continue to suffer from these injuries for the rest of Plaintiffs' lives, and Plaintiffs seek compensation for such future damages.

Exemplary Damages

77. Plaintiffs are entitled to exemplary damages under Chapter 41 of the Texas Civil Practice and Remedies Code from Defendant because Defendants' acts and/or omissions, when viewed objectively from the standpoint of Defendants at the time of the occurrence, involved an extreme degree of risk, considering the probability and magnitude of the potential harm to others, and Defendants had actual, subjective awareness of the risk involved, but nevertheless proceeded with conscious indifference to the rights, safety and welfare of others, including Plaintiffs.

XVIII.

RELIEF SOUGHT

78. Plaintiffs request that Defendants be cited to appear and answer, and that this case be tried, after which Plaintiffs recover:

1. Judgment against Defendants for a sum within the jurisdictional limits of this Court for the damages indicated above;
2. Pre-judgment and post-judgment interest at the maximum amount allowed by law;
3. Attorneys' Fees;
4. Costs of suit; and

5. Such other and further relief to which Plaintiffs may be justly entitled.

Respectfully submitted,

SCHEEF & STONE, L.L.P.

/s/ J. Mitchell Little

J. Mitchell Little
State Bar No. 24043788
mitch.little@solidcounsel.com
2600 Network Blvd., Suite 400
Frisco, Texas 75034
(214) 472-2100 Phone
(214) 472-2150 Fax

MARTIN WALKER, LLP

/s/ John F. (Jack) Walker, III

John F. (Jack) Walker, III
State Bar No. 00785167
jwalker@martinwalkerlaw.com
The Arcadia Building
111 W. Ferguson St.
Tyler, Texas 75702
(903) 526-1600 Telephone
(903) 595-0796 Telefax

CRAIN BROGDON, L.L.P.

/s/ Quentin Brogdon

QUENTIN BROGDON

State Bar No. 03054200
ROBERT D. CRAIN
State Bar No. 00790525
Qbrogdon@crainbrogdon.com
rcrain@crainbrogdon.com
4925 Greenville Ave., Suite 1450
Dallas, Texas 75206
Phone: (214) 522-9404
Fax: (214) 613-5101

ATTORNEYS FOR PLAINTIFFS

Automated Certificate of eService

This automated certificate of service was created by the e filing system. The filer served this document via email generated by the e filing system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Kathryn Kline on behalf of Quentin Brogdon
Bar No. 3054200
KKline@crainbrogdon.com
Envelope ID: 108647229
Filing Code Description: Plaintiff's Original Petition (OCA)
Filing Description: Plaintiffs' Original Petition
Status as of 12/3/2025 9:50 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
J. MitchellLittle		mitch.little@solidcounsel.com	12/3/2025 9:00:00 AM	NOT SENT
John F. (Jack)Walker		jwalker@martinwalkerlaw.com	12/3/2025 9:00:00 AM	NOT SENT