

CAUSE NO. DC-25-09345

BRIAN MORROW, ET. AL,

Plaintiffs,

v.

RANDY SCHACKMANN, ET. AL,

Defendants.

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IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

95TH JUDICIAL DISTRICT

**DEFENDANTS' MOTION FOR PROTECTIVE ORDER**

Defendants Randy Schackmann, Kim Brady, Cassandra Hatfield, Ileana Garza-Rojas, Marjorie Barnes, and the Carrollton Farmers Branch Independent School District (the District) (collectively, Defendants) ask the Court to protect the confidentiality of documents produced in response to Plaintiffs' Requests for Production. As such, Defendants submit this Motion for Protective Order in the pending action and would respectfully show as follows:

**A. INTRODUCTION**

1. On November 5, 2025, Plaintiffs served Defendants with the attached Requests for Production, labeled Exhibit A.
2. In response to Plaintiffs' requests, numerous responsive documents were located and produced, including some that pertained to the personnel files of a District employee who is not a party to this lawsuit (the Confidential Materials). These records contain sensitive data including personnel information that is confidential by law.
3. Defendants conferred with Plaintiffs' counsel in a good-faith effort to seek an Agreed Protective Order regarding the Confidential Materials. However, Plaintiffs' counsel indicated he was not agreeable to a "broad or 'blanket'" Protective Order that limited the use of confidential materials to counsel or "attorneys' eyes only," as shown in the attached emails labeled Exhibit B.

Plaintiffs' counsel also contests the confidential nature of the Confidential Materials. As the terms of the Court's Standing Protective Order limit the use of confidential materials to counsel for the litigation of this matter and Plaintiffs' counsel objects to Defendants' designation of the Confidential Materials defined *supra*, the parties were unable to come to an agreement.

### **B. ARGUMENT & AUTHORITIES**

4. A court has broad discretion to protect a person from discovery with a protective order.<sup>1</sup> A court can (1) prohibit the discovery sought in whole or in part, (2) limit the extent or subject matter of discovery, (3) order that discovery not be undertaken at the time or place specified, (4) set terms or conditions on the discovery, (5) order the results of discovery to be sealed or otherwise protected, and (6) make any other order in the interest of justice.<sup>2</sup>

5. For the reasons described above, Defendants ask the Court to sign a protective order restricting the use and dissemination of the results of the discovery sought in this case.

WHEREFORE, PREMISES CONSIDERED, the Defendants pray that the Court grant this Motion and for such other and further relief, both general and specific, at law or in equity, to which they may show themselves to be justly entitled.

Respectfully submitted,

By: /s/Meredith Prykryl Walker  
Meredith Prykryl Walker  
State Bar No. 24056487  
Bethany Walters  
State Bar No. 24108560  
D. Craig Wood  
State Bar No. 21888700

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<sup>1</sup> See Tex. R. Civ. P. 192.6(b).

<sup>2</sup> *Id.*

Meredith Prykryl Walker  
Bethany Walters  
WALSH GALLEGOS KYLE  
ROBINSON & DE LOS SANTOS P.C.  
105 Decker Court, Suite 700  
Irving, Texas 75062  
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214.574.8801 (facsimile)  
[mwalker@wabsa.com](mailto:mwalker@wabsa.com)  
[bwalters@wabsa.com](mailto:bwalters@wabsa.com)

D. Craig Wood  
WALSH GALLEGOS KYLE  
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San Antonio, Texas 78209  
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210.979.7024 (facsimile)  
[cwood@wabsa.com](mailto:cwood@wabsa.com)

ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the above and foregoing document was served upon the following counsel of record in a manner authorized by and in accordance with the Texas Rules of Civil Procedure on January 21, 2026.

Brian T. Morrow  
The Law Office of Brian T. Morrow  
P.O. Box 116100  
Carrollton, Texas 75007

/s/ Meredith Prykryl Walker  
Meredith Prykryl Walker

**EXHIBIT A**

CAUSE NO. DC-25-09345

BRIAN MORROW, ET AL.,

*Plaintiffs,*

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RANDY SCHACKMANN, ET AL.,

*Defendants,*

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IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

95<sup>TH</sup> JUDICIAL DISTRICT

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**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION TO DEFENDANT MARJORIE BARNES**

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TO: Defendant Marjorie Barnes, by and through their attorney of record, Bethany Walters, 105 Decker Ct., Suite 700, Irving, TX 75602

FROM: Plaintiffs, Brian T. Morrow, et al.

Pursuant to Rules 190 and 196 of the Texas Rules of Civil Procedure ("TRCP"), Plaintiffs request that Defendant Barnes (hereinafter "You" or "Your") produce, within thirty (30) days of the date of service, the documents and tangible things described below.

The documents are to be produced for inspection and copying at the offices of Plaintiffs' counsel, 1020 Magnolia Dr., Carrollton, TX 75007, or, as applicable to Electronically Stored Information ("ESI"), in a reasonably usable electronic format as required by TRCP 196.4.

**I. DEFINITIONS**

1. **"Communication"** means any transmission or exchange of information, whether oral, written, or electronic, including but not limited to letters, memoranda, notes, emails, text messages (SMS/MMS), instant messages (e.g., WhatsApp, Signal, Facebook Messenger), social media messages or posts, voicemails, and any other form of data compilation from which information can be obtained.
2. **"Document"** is used in its broadest sense as defined by TRCP 192.3(b) and includes all "Communications," "ESI," and "Personal Device" data. It encompasses any written, printed, typed, recorded, graphic, or other tangible matter, however produced or reproduced, including but not limited to the complete original and any non-identical copies.
3. **"ESI" (Electronically Stored Information)** means any "Document" or "Communication" that is created, manipulated, stored, or transmitted in digital form on any "Device," including but not limited to emails, calendar files, databases, spreadsheets, word processing documents, text messages, instant messages, and social media data.
4. **"Device"** means any physical piece of equipment that can store, process, or transmit ESI, including but not limited to computers, laptops, servers, tablets, and mobile phones (e.g., smartphones). This definition includes both work-issued devices and "Personal Devices."

5. **"Personal Device"** means any "Device" (as defined above) that is not owned, issued, or paid for by Carrollton-Farmers Branch Independent School District ("the District") but that was used at any time to create, store, receive, or transmit any "Communication" or "Document" "Relating to" this Lawsuit.
6. **"You"** or **"Your"** means the Defendant Marjorie Barnes to whom this request is directed, and any of their agents, representatives, attorneys, or anyone else acting on their behalf.
7. **"Relating to"** means consisting of, referring to, reflecting, evidencing, concerning, or in any way logically or factually connected with the matter discussed.
8. **"The Lawsuit"** shall mean the claims, allegations, and defenses asserted by any party in the above-entitled cause.

## II. INSTRUCTIONS

1. **Continuing Duty:** These requests are continuing in nature. Pursuant to TRCP 193.5, if You obtain information after producing a response that makes Your original response incorrect or incomplete, You are required to supplement Your response.
2. **Possession, Custody, or Control:** You must produce all responsive Documents in Your possession, custody, or control. This includes Documents held by You, Your agents, Your attorneys, or any other person or entity subject to Your control.
3. **Privilege Log (TRCP 193.3):** If any Document or Communication is withheld from production under a claim of privilege, You must provide a "privilege log" that complies with TRCP 193.3(b). This log must, as to each withheld item, state:
  - (a) the specific privilege asserted; and
  - (b) the following information: (i) the type of document/communication; (ii) the date; (iii) the author(s) and sender(s); (iv) the recipient(s); and (v) the general subject matter.
4. **Lost or Destroyed Documents:** If any responsive Document has been lost or destroyed, identify such Document and state the date of its loss or destruction, the identity of the person who destroyed it, and the reason for its destruction.
5. **ESI Production Format:** As noted in Plaintiffs' Advisory to the Court filed November 3, 2025, the parties have not yet executed an ESI agreement due to Defendants' failure to respond. Pending a Court order or agreement, ESI must be produced in a reasonably usable format as required by TRCP 196.4.
  - (a) Native Format: Plaintiffs request that ESI (such as emails, spreadsheets, and word processing files) be produced in their native format (e.g., .pst, .xlsx, .docx).
  - (b) Text Messages: Text messages and instant messages must be produced in a complete, exportable format that preserves all metadata, including sender, recipient, date, and time (e.g., a "text message report" from a forensic tool, not as individual screenshots).
  - (c) Non-Searchable Formats: Production of ESI in non-searchable, "flat" image formats (like TIFF or static PDF) is not acceptable.

### **III. DOCUMENTS TO BE PRODUCED**

**REQUEST NO. 1:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Defendant Randy Schackmann from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

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**REQUEST NO. 4:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Nancy Kimmel Brady or “Kim Brady” from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 5:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Carolyn Benavides from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 6:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Ileana Garza-Rojas from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 7:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Sally Derrick from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

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campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 10:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Brian Moersch from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 11:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Corey Blackburn from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 12:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Lance Hamlin from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 13:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Chris Moore from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 14:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Cooperative Strategies from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 15:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Woolpert Consulting from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 16:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Population and Survey Analysts (“PASA”) from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 17:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Brian T. Morrow.

**REQUEST NO. 18:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Lisa Sutter.

**REQUEST NO. 19:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Nelly Shankle.

**REQUEST NO. 20:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Venus Basaran.

**REQUEST NO. 21:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Iris Moore.

**REQUEST NO. 22:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Amanda Nauert.

**REQUEST NO. 23:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Aaron Nauert.

**REQUEST NO. 24:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Tierney Gonzalez.

**REQUEST NO. 25:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Jacob Gonzalez.

**REQUEST NO. 26:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Candace Valenzuela.

**REQUEST NO. 27:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Nicole Yarbrough.

**REQUEST NO. 28:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Thomas Mendez.

**REQUEST NO. 29:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Katherine E. Hughey.

**REQUEST NO. 30:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Carrollton's involvement in, position on, or impact from the Campus Consolidation Plan.**

**REQUEST NO. 31:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Farmers Branch's involvement in, position on, or impact from the Campus Consolidation Plan.**

**REQUEST NO. 32:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Dallas's involvement in, position on, or impact from** the Campus Consolidation Plan.

**REQUEST NO. 33:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Irving's involvement in, position on, or impact from** the Campus Consolidation Plan.

Respectfully Submitted,

/s/ Brian T. Morrow  
Brian T. Morrow  
State Bar No. 24110136  
The Law Office of Brian T. Morrow  
PO Box 116100 Carrollton, Texas 75007  
Tel: (805) 801-5253  
[b.thomas.morrow@gmail.com](mailto:b.thomas.morrow@gmail.com)

ATTORNEY FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Plaintiffs' First Request for Production to Defendant Marjorie Barnes** was served on Defendants' counsel of record via the electronic filing manager in accordance with the Texas Rules of Civil Procedure on this 5th day of November, 2025.

/s/ Brian T. Morrow  
Brian T. Morrow

BRIAN MORROW, ET AL.,

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IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

95<sup>TH</sup> JUDICIAL DISTRICT

**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION TO DEFENDANT NANCY  
KIMMEL BRADY (AKA "KIM BRADY")**

TO: Defendant Nancy Kimmel Brady (AKA "Kim Brady"), by and through their attorney of record, Bethany Walters, 105 Decker Ct., Suite 700, Irving, TX 75602

FROM: Plaintiffs, Brian T. Morrow, et al.

Pursuant to Rules 190 and 196 of the Texas Rules of Civil Procedure ("TRCP"), Plaintiffs request that Defendant Brady (hereinafter "You" or "Your") produce, within thirty (30) days of the date of service, the documents and tangible things described below.

The documents are to be produced for inspection and copying at the offices of Plaintiffs' counsel, 1020 Magnolia Dr., Carrollton, TX 75007, or, as applicable to Electronically Stored Information ("ESI"), in a reasonably usable electronic format as required by TRCP 196.4.

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### **III. DOCUMENTS TO BE PRODUCED**

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**REQUEST NO. 12:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Lance Hamlin from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 13:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Chris Moore from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 14:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Cooperative Strategies from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 15:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Woolpert Consulting from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 16:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Population and Survey Analysts (“PASA”) from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 17:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Brian T. Morrow.

**REQUEST NO. 18:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Lisa Sutter.

**REQUEST NO. 19:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Nelly Shankle.

**REQUEST NO. 20:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Venus Basaran.

**REQUEST NO. 21:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Iris Moore.

**REQUEST NO. 22:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Amanda Nauert.

**REQUEST NO. 23:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Aaron Nauert.

**REQUEST NO. 24:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Tierney Gonzalez.

**REQUEST NO. 25:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Jacob Gonzalez.

**REQUEST NO. 26:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Candace Valenzuela.

**REQUEST NO. 27:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Nicole Yarbrough.

**REQUEST NO. 28:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Thomas Mendez.

**REQUEST NO. 29:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Katherine E. Hughey.

**REQUEST NO. 30:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Carrollton's involvement in, position on, or impact from the Campus Consolidation Plan.**

**REQUEST NO. 31:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Farmers Branch's involvement in, position on, or impact from the Campus Consolidation Plan.**

**REQUEST NO. 32:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Dallas’s involvement in, position on, or impact from the Campus Consolidation Plan.**

**REQUEST NO. 33:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Irving’s involvement in, position on, or impact from the Campus Consolidation Plan.**

Respectfully Submitted,

/s/ Brian T. Morrow

Brian T. Morrow

State Bar No. 24110136

The Law Office of Brian T. Morrow

PO Box 116100 Carrollton, Texas 75007

Tel: (805) 801-5253

[b.thomas.morrow@gmail.com](mailto:b.thomas.morrow@gmail.com)

ATTORNEY FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Plaintiffs' First Request for Production to Defendant Nancy Kimmel Brady AKA "Kim Brady"** was served on Defendants' counsel of record via the electronic filing manager in accordance with the Texas Rules of Civil Procedure on this 5th day of November, 2025.

/s/ Brian T. Morrow  
Brian T. Morrow

BRIAN MORROW, ET AL.,

*Plaintiffs,*

v.

RANDY SCHACKMANN, ET AL.,

*Defendants,*

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IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

95<sup>TH</sup> JUDICIAL DISTRICT

**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION TO DEFENDANT  
CARROLLTON-FARMERS BRANCH INDEPENDENT SCHOOL DISTRICT**

**TO:** Defendant **Carrollton-Farmers Branch Independent School District**, by and through its representative for service, Superintendent Dr. Wendy Eldredge, and its attorney of record, Bethany Walters, 105 Decker Ct., Suite 700, Irving, TX 75602

**FROM:** Plaintiffs, Brian T. Morrow, et al.

Pursuant to Rules 190 and 196 of the Texas Rules of Civil Procedure ("TRCP"), Plaintiffs request that Defendant **Carrollton-Farmers Branch Independent School District** (hereinafter "You" or "Your") produce, within thirty (30) days of the date of service, the documents and tangible things described below.

The documents are to be produced for inspection and copying at the offices of Plaintiffs' counsel, 1020 Magnolia Dr., Carrollton, TX 75007, or, as applicable to Electronically Stored Information ("ESI"), in a reasonably usable electronic format as required by TRCP 196.4.

**I. DEFINITIONS**

1. **"Communication"** means any transmission or exchange of information, whether oral, written, or electronic, including but not limited to letters, memoranda, notes, emails, text messages (SMS/MMS), instant messages (e.g., WhatsApp, Signal, Facebook Messenger), social media messages or posts, voicemails, and any other form of data compilation from which information can be obtained.
2. **"Document"** is used in its broadest sense as defined by TRCP 192.3(b) and includes all "Communications," "ESI," and "Personal Device" data. It encompasses any written, printed, typed, recorded, graphic, or other tangible matter, however produced or reproduced, including but not limited to the complete original and any non-identical copies.

3. **"ESI" (Electronically Stored Information)** means any "Document" or "Communication" that is created, manipulated, stored, or transmitted in digital form on any "Device," including but not limited to emails, calendar files, databases, spreadsheets, word processing documents, text messages, instant messages, and social media data.
4. **"Device"** means any physical piece of equipment that can store, process, or transmit ESI, including but not limited to computers, laptops, servers, tablets, and mobile phones (e.g., smartphones). This definition includes both work-issued devices and "Personal Devices."
5. **"Personal Device"** means any "Device" (as defined above) that is not owned, issued, or paid for by Carrollton-Farmers Branch Independent School District ("the District") but that was used at any time to create, store, receive, or transmit any "Communication" or "Document" "Relating to" this Lawsuit.
6. **"You" or "Your"** means the Defendant **Carrollton-Farmers Branch Independent School District ("the District")**, and **all** of its past or present officers, Trustees, directors, employees, agents, representatives, attorneys, or anyone else acting on its behalf.
7. **"Relating to"** means consisting of, referring to, reflecting, evidencing, concerning, or in any way logically or factually connected with the matter discussed.
8. **"The Lawsuit"** shall mean the claims, allegations, and defenses asserted by any party in the above-entitled cause.
9. **"Custodian(s)"** means any past or present officer, Trustee, or employee of the District whose files may contain responsive documents. This includes, but is not limited to, all named individual Defendants in this Lawsuit (Randy Schackmann, Kim Brady, Cassandra Hatfield, Ileana Garza-Rojas, Marjorie Barnes), as well as Superintendent Dr. Wendy Eldredge, Tara Hrbacek, Carolyn Benavides, Sally Derrick, Damaris "Dee" Canada, Brian Moersch, Corey Blackburn, Lance Hamlin, Chris Moore.

## II. INSTRUCTIONS

1. **Continuing Duty:** These requests are continuing in nature. Pursuant to TRCP 193.5, if You obtain information after producing a response that makes Your original response incorrect or incomplete, You are required to supplement Your response.
2. **Possession, Custody, or Control:** You must produce all responsive Documents in Your possession, custody, or control. This includes Documents held by You, Your agents, Your attorneys, or any other person or entity subject to Your control.
3. **Privilege Log (TRCP 193.3):** If any Document or Communication is withheld from production under a claim of privilege, You must provide a "privilege log" that complies with TRCP 193.3(b). This log must, as to each withheld item, state:

- (a) the specific privilege asserted; and
  - (b) the following information: (i) the type of document/communication; (ii) the date; (iii) the author(s) and sender(s); (iv) the recipient(s); and (v) the general subject matter.
4. **Lost or Destroyed Documents:** If any responsive Document has been lost or destroyed, identify such Document and state the date of its loss or destruction, the identity of the person who destroyed it, and the reason for its destruction.
5. **ESI Production Format:** As noted in Plaintiffs' Advisory to the Court filed November 3, 2025, the parties have not yet executed an ESI agreement due to Defendants' failure to respond. Pending a Court order or agreement, ESI must be produced in a reasonably usable format as required by TRCP 196.4.
- (a) Native Format: Plaintiffs request that ESI (such as emails, spreadsheets, and word processing files) be produced in their native format (e.g., .pst, .xlsx, .docx).
  - (b) Text Messages: Text messages and instant messages must be produced in a complete, exportable format that preserves all metadata, including sender, recipient, date, and time (e.g., a "text message report" from a forensic tool, not as individual screenshots).
  - (c) Non-Searchable Formats: Production of ESI in non-searchable, "flat" image formats (like TIFF or static PDF) is not acceptable.
6. **Duty to Search:** You are instructed to conduct a thorough search of all locations where responsive documents are likely to be found. This includes all ESI under Your control, *regardless of its physical location* (e.g., on District servers, third-party cloud accounts, or the "Personal Devices" of Your officers, Trustees, and employees used for District business, as defined in Definition #5).

### III. DOCUMENTS TO BE PRODUCED

#### PART 1: OFFICIAL RECORDS (The "What")

**REQUEST NO. 1:** All Documents and ESI, including all **drafts, versions, and final reports**, created, modified, or received by You from January 1, 2023, to August 31, 2025, **Relating to** the Campus Consolidation Plan or any campus closure.

**REQUEST NO. 2:** All Documents and ESI, including all **drafts, versions, and final reports**, from January 1, 2023, to August 31, 2025, **Relating to** the 2024 fiscal budget or the 2025 fiscal budget. (This includes, but is not limited to, all spreadsheets, ledgers, and financial analyses.)

**REQUEST NO. 3:** All Documents and ESI, including all **drafts and final versions**, from January 1, 2023, to August 31, 2025, **Relating to** any public-facing statements or community

communications about the Campus Consolidation Plan. (This includes, but is not limited to, press releases, website content, FAQs, community forum scripts, and social media posts.)

**PART 2: COMMUNICATIONS WITH CONSULTANTS (The "Experts")**

**REQUEST NO. 4:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) between any **Custodian** and **Cooperative Strategies** from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan or the 2024/2025 fiscal budgets.

**REQUEST NO. 5:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) between any **Custodian** and **Woolpert Consulting** from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan or the 2024/2025 fiscal budgets.

**REQUEST NO. 6:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) between any **Custodian** and **Population and Survey Analysts ("PASA")** from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan or the 2024/2025 fiscal budgets.

**PART 3: SUBJECT-MATTER COMMUNICATIONS (The "About Whom")**

**REQUEST NO. 7:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to** Plaintiff **Brian T. Morrow**.

**REQUEST NO. 8:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to** Plaintiff **Lisa Sutter**.

**REQUEST NO. 9:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to** Plaintiff **Nelly Shankle**.

**REQUEST NO. 10:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to** Plaintiff **Venus Basaran**.

**REQUEST NO. 11:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to** Plaintiff **Iris Moore**.

**REQUEST NO. 12:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to** Plaintiff **Amanda Nauert**.

**REQUEST NO. 13:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to Plaintiff Aaron Nauert.**

**REQUEST NO. 14:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to Plaintiff Tierney Gonzalez.**

**REQUEST NO. 15:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to Plaintiff Jacob Gonzalez.**

**REQUEST NO. 16:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to Plaintiff Candace Valenzuela.**

**REQUEST NO. 17:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to Plaintiff Nicole Yarbrough.**

**REQUEST NO. 18:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to Plaintiff Thomas Mendez.**

**REQUEST NO. 19:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, that refer or **Relate to Plaintiff Katherine E. Hughey.**

**REQUEST NO. 21:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, **Relating to the City Council of Carrollton's** involvement in, position on, or impact from the Campus Consolidation Plan.

**REQUEST NO. 22:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, **Relating to the City Council of Farmers Branch's** involvement in, position on, or impact from the Campus Consolidation Plan.

**REQUEST NO. 23:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31, 2025, **Relating to the City Council of Dallas's** involvement in, position on, or impact from the Campus Consolidation Plan.

**REQUEST NO. 24:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices of any Custodian) from January 1, 2023, to August 31,

2025, **Relating to the City Council of Irving's** involvement in, position on, or impact from the Campus Consolidation Plan.

Respectfully Submitted,

/s/ Brian T. Morrow  
Brian T. Morrow  
State Bar No. 24110136  
The Law Office of Brian T. Morrow  
PO Box 116100 Carrollton, Texas 75007  
Tel: (805) 801-5253  
[b.thomas.morrow@gmail.com](mailto:b.thomas.morrow@gmail.com)

ATTORNEY FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Plaintiffs' First Request for Production to Defendant Carrollton-Farmers Branch Independent School District** was served on Defendants' counsel of record via the electronic filing manager in accordance with the Texas Rules of Civil Procedure on this 5th day of November 2025.

*/s/ Brian T. Morrow*

Brian T. Morrow

BRIAN MORROW, ET AL.,

*Plaintiffs,*

v.

RANDY SCHACKMANN, ET AL.,

*Defendants,*

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IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

95<sup>TH</sup> JUDICIAL DISTRICT

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**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION TO DEFENDANT ILEANA GARZA-ROJAS**

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TO: Defendant Ileana Garza-Rojas, by and through their attorney of record, Bethany Walters, 105 Decker Ct., Suite 700, Irving, TX 75602

FROM: Plaintiffs, Brian T. Morrow, et al.

Pursuant to Rules 190 and 196 of the Texas Rules of Civil Procedure ("TRCP"), Plaintiffs request that Defendant Garza-Rojas (hereinafter "You" or "Your") produce, within thirty (30) days of the date of service, the documents and tangible things described below.

The documents are to be produced for inspection and copying at the offices of Plaintiffs' counsel, 1020 Magnolia Dr., Carrollton, TX 75007, or, as applicable to Electronically Stored Information ("ESI"), in a reasonably usable electronic format as required by TRCP 196.4.

**I. DEFINITIONS**

1. **"Communication"** means any transmission or exchange of information, whether oral, written, or electronic, including but not limited to letters, memoranda, notes, emails, text messages (SMS/MMS), instant messages (e.g., WhatsApp, Signal, Facebook Messenger), social media messages or posts, voicemails, and any other form of data compilation from which information can be obtained.
2. **"Document"** is used in its broadest sense as defined by TRCP 192.3(b) and includes all "Communications," "ESI," and "Personal Device" data. It encompasses any written, printed, typed, recorded, graphic, or other tangible matter, however produced or reproduced, including but not limited to the complete original and any non-identical copies.
3. **"ESI" (Electronically Stored Information)** means any "Document" or "Communication" that is created, manipulated, stored, or transmitted in digital form on any "Device," including but not limited to emails, calendar files, databases, spreadsheets, word processing documents, text messages, instant messages, and social media data.
4. **"Device"** means any physical piece of equipment that can store, process, or transmit ESI, including but not limited to computers, laptops, servers, tablets, and mobile phones (e.g., smartphones). This definition includes both work-issued devices and "Personal Devices."

5. **"Personal Device"** means any "Device" (as defined above) that is not owned, issued, or paid for by Carrollton-Farmers Branch Independent School District ("the District") but that was used at any time to create, store, receive, or transmit any "Communication" or "Document" "Relating to" this Lawsuit.
6. **"You"** or **"Your"** means the Defendant Ileana Garza-Rojas to whom this request is directed, and any of their agents, representatives, attorneys, or anyone else acting on their behalf.
7. **"Relating to"** means consisting of, referring to, reflecting, evidencing, concerning, or in any way logically or factually connected with the matter discussed.
8. **"The Lawsuit"** shall mean the claims, allegations, and defenses asserted by any party in the above-entitled cause.

## II. INSTRUCTIONS

1. **Continuing Duty:** These requests are continuing in nature. Pursuant to TRCP 193.5, if You obtain information after producing a response that makes Your original response incorrect or incomplete, You are required to supplement Your response.
2. **Possession, Custody, or Control:** You must produce all responsive Documents in Your possession, custody, or control. This includes Documents held by You, Your agents, Your attorneys, or any other person or entity subject to Your control.
3. **Privilege Log (TRCP 193.3):** If any Document or Communication is withheld from production under a claim of privilege, You must provide a "privilege log" that complies with TRCP 193.3(b). This log must, as to each withheld item, state:
  - (a) the specific privilege asserted; and
  - (b) the following information: (i) the type of document/communication; (ii) the date; (iii) the author(s) and sender(s); (iv) the recipient(s); and (v) the general subject matter.
4. **Lost or Destroyed Documents:** If any responsive Document has been lost or destroyed, identify such Document and state the date of its loss or destruction, the identity of the person who destroyed it, and the reason for its destruction.
5. **ESI Production Format:** As noted in Plaintiffs' Advisory to the Court filed November 3, 2025, the parties have not yet executed an ESI agreement due to Defendants' failure to respond. Pending a Court order or agreement, ESI must be produced in a reasonably usable format as required by TRCP 196.4.
  - (a) Native Format: Plaintiffs request that ESI (such as emails, spreadsheets, and word processing files) be produced in their native format (e.g., .pst, .xlsx, .docx).
  - (b) Text Messages: Text messages and instant messages must be produced in a complete, exportable format that preserves all metadata, including sender, recipient, date, and time (e.g., a "text message report" from a forensic tool, not as individual screenshots).
  - (c) Non-Searchable Formats: Production of ESI in non-searchable, "flat" image formats (like TIFF or static PDF) is not acceptable.

### **III. DOCUMENTS TO BE PRODUCED**

**REQUEST NO. 1:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Defendant Randy Schackmann from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 2:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Cassandra Hatfield from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 3:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Tara Hrbacek from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 4:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Nancy Kimmel Brady or “Kim Brady” from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 5:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Carolyn Benavides from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 6:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Marjorie Barnes from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 7:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Sally Derrick from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 8:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Damaris “Dee” Canada from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 9:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Wendy Eldredge from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of

campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 10:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Brian Moersch from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 11:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Corey Blackburn from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 12:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Lance Hamlin from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 13:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Chris Moore from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 14:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Cooperative Strategies from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 15:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Woolpert Consulting from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 16:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Population and Survey Analysts (“PASA”) from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 17:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Brian T. Morrow.

**REQUEST NO. 18:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Lisa Sutter.

**REQUEST NO. 19:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Nelly Shankle.

**REQUEST NO. 20:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Venus Basaran.

**REQUEST NO. 21:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Iris Moore.

**REQUEST NO. 22:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Amanda Nauert.

**REQUEST NO. 23:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Aaron Nauert.

**REQUEST NO. 24:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Tierney Gonzalez.

**REQUEST NO. 25:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Jacob Gonzalez.

**REQUEST NO. 26:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Candace Valenzuela.

**REQUEST NO. 27:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Nicole Yarbrough.

**REQUEST NO. 28:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Thomas Mendez.

**REQUEST NO. 29:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Katherine E. Hughey.

**REQUEST NO. 30:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Carrollton's involvement in, position on, or impact from** the Campus Consolidation Plan.

**REQUEST NO. 31:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Farmers Branch's involvement in, position on, or impact from** the Campus Consolidation Plan.

**REQUEST NO. 32:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Dallas's involvement in, position on, or impact from the Campus Consolidation Plan.**

**REQUEST NO. 33:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Irving's involvement in, position on, or impact from the Campus Consolidation Plan.**

Respectfully Submitted,

/s/ Brian T. Morrow

Brian T. Morrow

State Bar No. 24110136

The Law Office of Brian T. Morrow

PO Box 116100 Carrollton, Texas 75007

Tel: (805) 801-5253

[b.thomas.morrow@gmail.com](mailto:b.thomas.morrow@gmail.com)

ATTORNEY FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Plaintiffs' First Request for Production to Defendant Ileana Garza-Rojas** was served on Defendants' counsel of record via the electronic filing manager in accordance with the Texas Rules of Civil Procedure on this 5th day of November, 2025.

/s/ Brian T. Morrow

Brian T. Morrow

BRIAN MORROW, ET AL.,

*Plaintiffs,*

V.

RANDY SCHACKMANN, ET AL.,

*Defendants,*

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IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

95<sup>TH</sup> JUDICIAL DISTRICT

**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION TO DEFENDANT CASSANDRA HATFIELD**

TO: Defendant Cassandra Hatfield, by and through their attorney of record, Bethany Walters, 105 Decker Ct., Suite 700, Irving, TX 75602

FROM: Plaintiffs, Brian T. Morrow, et al.

Pursuant to Rules 190 and 196 of the Texas Rules of Civil Procedure ("TRCP"), Plaintiffs request that Defendant Hatfield (hereinafter "You" or "Your") produce, within thirty (30) days of the date of service, the documents and tangible things described below.

The documents are to be produced for inspection and copying at the offices of Plaintiffs' counsel, 1020 Magnolia Dr., Carrollton, TX 75007, or, as applicable to Electronically Stored Information ("ESI"), in a reasonably usable electronic format as required by TRCP 196.4.

**I. DEFINITIONS**

1. **"Communication"** means any transmission or exchange of information, whether oral, written, or electronic, including but not limited to letters, memoranda, notes, emails, text messages (SMS/MMS), instant messages (e.g., WhatsApp, Signal, Facebook Messenger), social media messages or posts, voicemails, and any other form of data compilation from which information can be obtained.
2. **"Document"** is used in its broadest sense as defined by TRCP 192.3(b) and includes all "Communications," "ESI," and "Personal Device" data. It encompasses any written, printed, typed, recorded, graphic, or other tangible matter, however produced or reproduced, including but not limited to the complete original and any non-identical copies.
3. **"ESI" (Electronically Stored Information)** means any "Document" or "Communication" that is created, manipulated, stored, or transmitted in digital form on any "Device," including but not limited to emails, calendar files, databases, spreadsheets, word processing documents, text messages, instant messages, and social media data.
4. **"Device"** means any physical piece of equipment that can store, process, or transmit ESI, including but not limited to computers, laptops, servers, tablets, and mobile phones (e.g., smartphones). This definition includes both work-issued devices and "Personal Devices."
5. **"Personal Device"** means any "Device" (as defined above) that is not owned, issued, or paid for by Carrollton-Farmers Branch Independent School District ("the District") but that was used at any time to create, store, receive, or transmit any "Communication" or "Document" "Relating to"

this Lawsuit.

6. **"You" or "Your"** means the Defendant Cassandra Hatfield to whom this request is directed, and any of their agents, representatives, attorneys, or anyone else acting on their behalf.
7. **"Relating to"** means consisting of, referring to, reflecting, evidencing, concerning, or in any way logically or factually connected with the matter discussed.
8. **"The Lawsuit"** shall mean the claims, allegations, and defenses asserted by any party in the above-entitled cause.

## II. INSTRUCTIONS

1. **Continuing Duty:** These requests are continuing in nature. Pursuant to TRCP 193.5, if You obtain information after producing a response that makes Your original response incorrect or incomplete, You are required to supplement Your response.
2. **Possession, Custody, or Control:** You must produce all responsive Documents in Your possession, custody, or control. This includes Documents held by You, Your agents, Your attorneys, or any other person or entity subject to Your control.
3. **Privilege Log (TRCP 193.3):** If any Document or Communication is withheld from production under a claim of privilege, You must provide a "privilege log" that complies with TRCP 193.3(b). This log must, as to each withheld item, state:
  - (a) the specific privilege asserted; and
  - (b) the following information: (i) the type of document/communication; (ii) the date; (iii) the author(s) and sender(s); (iv) the recipient(s); and (v) the general subject matter.
4. **Lost or Destroyed Documents:** If any responsive Document has been lost or destroyed, identify such Document and state the date of its loss or destruction, the identity of the person who destroyed it, and the reason for its destruction.
5. **ESI Production Format:** As noted in Plaintiffs' Advisory to the Court filed November 3, 2025, the parties have not yet executed an ESI agreement due to Defendants' failure to respond. Pending a Court order or agreement, ESI must be produced in a reasonably usable format as required by TRCP 196.4.
  - (a) Native Format: Plaintiffs request that ESI (such as emails, spreadsheets, and word processing files) be produced in their native format (e.g., .pst, .xlsx, .docx).
  - (b) Text Messages: Text messages and instant messages must be produced in a complete, exportable format that preserves all metadata, including sender, recipient, date, and time (e.g., a "text message report" from a forensic tool, not as individual screenshots).
  - (c) Non-Searchable Formats: Production of ESI in non-searchable, "flat" image formats (like TIFF or static PDF) is not acceptable.

## III. DOCUMENTS TO BE PRODUCED

**REQUEST NO. 1:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Defendant Randy Schackmann from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 2:** All Communications, including ESI, emails, and text messages, stored on any

Device (including Personal Devices), between You and Nancy Kimmel Brady or “Kim Brady” from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 3:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Tara Hrbacek from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 4:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Ileana Garza-Rojas from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 5:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Carolyn Benavides from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 6:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Marjorie Barnes from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 7:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Sally Derrick from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 8:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Damaris “Dee” Canada from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 9:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Wendy Eldredge from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 10:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Brian Moersch from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 11:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Corey Blackburn from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

component of, or otherwise Relating to, said Plan.

**REQUEST NO. 12:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Lance Hamlin from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 13:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Chris Moore from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 14:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Cooperative Strategies from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 15:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Woolpert Consulting from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 16:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Population and Survey Analysts (“PASA”) from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 17:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Brian T. Morrow.

**REQUEST NO. 18:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Lisa Sutter.

**REQUEST NO. 19:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Nelly Shankle.

**REQUEST NO. 20:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Venus Basaran.

**REQUEST NO. 21:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Iris Moore.

**REQUEST NO. 22:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Amanda Nauert.

**REQUEST NO. 23:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Aaron Nauert.

**REQUEST NO. 24:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Tierney Gonzalez.

**REQUEST NO. 25:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Jacob Gonzalez.

**REQUEST NO. 26:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Candace Valenzuela.

**REQUEST NO. 27:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Nicole Yarbrough.

**REQUEST NO. 28:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Thomas Mendez.

**REQUEST NO. 29:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Katherine E. Hughey.

**REQUEST NO. 30:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Carrollton's involvement in, position on, or impact from** the Campus Consolidation Plan.

**REQUEST NO. 31:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Farmers Branch's involvement in, position on, or impact from** the Campus Consolidation Plan.

**REQUEST NO. 32:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Dallas's involvement in, position on, or impact from** the Campus Consolidation Plan.

**REQUEST NO. 33:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Irving's involvement in, position on, or impact from** the Campus Consolidation Plan.

Respectfully Submitted,

/s/ Brian T. Morrow  
Brian T. Morrow  
State Bar No. 24110136  
The Law Office of Brian T. Morrow  
PO Box 116100 Carrollton, Texas 75007  
Tel: (805) 801-5253  
[b.thomas.morrow@gmail.com](mailto:b.thomas.morrow@gmail.com)

ATTORNEY FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Plaintiffs' First Request for Production to Defendant Cassandra Hatfield** was served on Defendants' counsel of record via the electronic filing manager in accordance with the Texas Rules of Civil Procedure on this 5th day of November, 2025.

/s/ Brian T. Morrow  
Brian T. Morrow

BRIAN MORROW, ET AL.,

*Plaintiffs,*

v.

RANDY SCHACKMANN, ET AL.,

*Defendants,*

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IN THE DISTRICT COURT OF

DALLAS COUNTY, TEXAS

95<sup>TH</sup> JUDICIAL DISTRICT

**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION TO DEFENDANT RANDY SCHACKMANN**

TO: Defendant Randy Schackmann, by and through their attorney of record, Bethany Walters, 105 Decker Ct., Suite 700, Irving, TX 75602

FROM: Plaintiffs, Brian T. Morrow, et al.

Pursuant to Rules 190 and 196 of the Texas Rules of Civil Procedure ("TRCP"), Plaintiffs request that Defendant Schackmann (hereinafter "You" or "Your") produce, within thirty (30) days of the date of service, the documents and tangible things described below.

The documents are to be produced for inspection and copying at the offices of Plaintiffs' counsel, 1020 Magnolia Dr., Carrollton, TX 75007, or, as applicable to Electronically Stored Information ("ESI"), in a reasonably usable electronic format as required by TRCP 196.4.

**I. DEFINITIONS**

1. **"Communication"** means any transmission or exchange of information, whether oral, written, or electronic, including but not limited to letters, memoranda, notes, emails, text messages (SMS/MMS), instant messages (e.g., WhatsApp, Signal, Facebook Messenger), social media messages or posts, voicemails, and any other form of data compilation from which information can be obtained.
2. **"Document"** is used in its broadest sense as defined by TRCP 192.3(b) and includes all "Communications," "ESI," and "Personal Device" data. It encompasses any written, printed, typed, recorded, graphic, or other tangible matter, however produced or reproduced, including but not limited to the complete original and any non-identical copies.
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4. **"Device"** means any physical piece of equipment that can store, process, or transmit ESI, including but not limited to computers, laptops, servers, tablets, and mobile phones (e.g., smartphones). This definition includes both work-issued devices and "Personal Devices."

5. **"Personal Device"** means any "Device" (as defined above) that is not owned, issued, or paid for by Carrollton-Farmers Branch Independent School District ("the District") but that was used at any time to create, store, receive, or transmit any "Communication" or "Document" "Relating to" this Lawsuit.
6. **"You"** or **"Your"** means the Defendant Randy Schackmann to whom this request is directed, and any of their agents, representatives, attorneys, or anyone else acting on their behalf.
7. **"Relating to"** means consisting of, referring to, reflecting, evidencing, concerning, or in any way logically or factually connected with the matter discussed.
8. **"The Lawsuit"** shall mean the claims, allegations, and defenses asserted by any party in the above-entitled cause.

## II. INSTRUCTIONS

1. **Continuing Duty:** These requests are continuing in nature. Pursuant to TRCP 193.5, if You obtain information after producing a response that makes Your original response incorrect or incomplete, You are required to supplement Your response.
2. **Possession, Custody, or Control:** You must produce all responsive Documents in Your possession, custody, or control. This includes Documents held by You, Your agents, Your attorneys, or any other person or entity subject to Your control.
3. **Privilege Log (TRCP 193.3):** If any Document or Communication is withheld from production under a claim of privilege, You must provide a "privilege log" that complies with TRCP 193.3(b). This log must, as to each withheld item, state:
  - (a) the specific privilege asserted; and
  - (b) the following information: (i) the type of document/communication; (ii) the date; (iii) the author(s) and sender(s); (iv) the recipient(s); and (v) the general subject matter.
4. **Lost or Destroyed Documents:** If any responsive Document has been lost or destroyed, identify such Document and state the date of its loss or destruction, the identity of the person who destroyed it, and the reason for its destruction.
5. **ESI Production Format:** As noted in Plaintiffs' Advisory to the Court filed November 3, 2025, the parties have not yet executed an ESI agreement due to Defendants' failure to respond. Pending a Court order or agreement, ESI must be produced in a reasonably usable format as required by TRCP 196.4.
  - (a) Native Format: Plaintiffs request that ESI (such as emails, spreadsheets, and word processing files) be produced in their native format (e.g., .pst, .xlsx, .docx).
  - (b) Text Messages: Text messages and instant messages must be produced in a complete, exportable format that preserves all metadata, including sender, recipient, date, and time (e.g., a "text message report" from a forensic tool, not as individual screenshots).
  - (c) Non-Searchable Formats: Production of ESI in non-searchable, "flat" image formats (like TIFF or static PDF) is not acceptable.

### **III. DOCUMENTS TO BE PRODUCED**

**REQUEST NO. 1:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Defendant Cassandra Hatfield from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 2:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Nancy Kimmel Brady or “Kim Brady” from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 3:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Tara Hrbacek from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 4:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Ileana Garza-Rojas from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 5:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Carolyn Benavides from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 6:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Marjorie Barnes from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 7:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Sally Derrick from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 8:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Damaris “Dee” Canada from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 9:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Wendy Eldredge from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of

campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 10:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Brian Moersch from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 11:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Corey Blackburn from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 12:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Lance Hamlin from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 13:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Chris Moore from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 14:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Cooperative Strategies from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 15:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Woolpert Consulting from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 16:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), between You and Population and Survey Analysts (“PASA”) from January 1, 2023, to August 31, 2025, Relating to the Campus Consolidation Plan (including all matters of campus closure or consolidation) and the use of the 2024 or 2025 fiscal budgets as a justification for, financial component of, or otherwise Relating to, said Plan.

**REQUEST NO. 17:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Brian T. Morrow.

**REQUEST NO. 18:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Lisa Sutter.

**REQUEST NO. 19:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Nelly Shankle.

**REQUEST NO. 20:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Venus Basaran.

**REQUEST NO. 21:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Iris Moore.

**REQUEST NO. 22:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Amanda Nauert.

**REQUEST NO. 23:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Aaron Nauert.

**REQUEST NO. 24:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Tierney Gonzalez.

**REQUEST NO. 25:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Jacob Gonzalez.

**REQUEST NO. 26:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Candace Valenzuela.

**REQUEST NO. 27:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Nicole Yarbrough.

**REQUEST NO. 28:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Thomas Mendez.

**REQUEST NO. 29:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from January 1, 2023, to August 31, 2025, that refer or Relate to Plaintiff Katherine E. Hughey.

**REQUEST NO. 30:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Carrollton's involvement in, position on, or impact from** the Campus Consolidation Plan.

**REQUEST NO. 31:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Farmers Branch's involvement in, position on, or impact from** the Campus Consolidation Plan.

**REQUEST NO. 32:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Dallas's involvement in, position on, or impact from the Campus Consolidation Plan.**

**REQUEST NO. 33:** All Communications, including ESI, emails, and text messages, stored on any Device (including Personal Devices), from **January 1, 2023, to August 31, 2025, Relating to the City Council of Irving's involvement in, position on, or impact from the Campus Consolidation Plan.**

Respectfully Submitted,

/s/ Brian T. Morrow

Brian T. Morrow

State Bar No. 24110136

The Law Office of Brian T. Morrow

PO Box 116100 Carrollton, Texas 75007

Tel: (805) 801-5253

[b.thomas.morrow@gmail.com](mailto:b.thomas.morrow@gmail.com)

ATTORNEY FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **Plaintiffs' First Request for Production to Defendant Randy Schackmann** was served on Defendants' counsel of record via the electronic filing manager in accordance with the Texas Rules of Civil Procedure on this 5th day of November, 2025.

/s/ Brian T. Morrow

Brian T. Morrow

# EXHIBIT B

**From:** Bethany Walters  
**Sent:** Thursday, January 15, 2026 6:05 PM  
**To:** Brian Morrow  
**Cc:** Anjela Young; Meredith Walker; Cynthia Osborne; Jessica Ghazal  
**Subject:** Morrow v. Schackmann - Defendants' Privilege Log  
**Attachments:** Defendants' Privilege Log 1.15.25.pdf

Mr. Morrow,

Please find attached the Defendants' Privilege Log for documents produced on December 18, 2025, labeled as CFBISD 0001-1166. The Defendants will produce an update privilege log along with the documents produced tomorrow.

Regarding the question you had about the Google Sheet referenced at CFBISD 0711, after completing investigation it appears that this document was produced to Plaintiff Amanda Nauert in response to a Public Information Act request. This document will also be included in tomorrow's supplemental discovery.

Lastly, as mentioned in my previous email on Monday, we would like to seek a protective order concerning documents produced by the Defendants that are a part of Dr. Eldredge's personnel file. This would not prevent you from seeing these documents but would control how these documents are handled, used, disclosed, and eventually destroyed. Please let me know by Tuesday, January 20 if you and your clients are agreeable to a protective order regarding these files. If you do not provide a response, we will assume that your clients are opposed.

Sincerely,



**WALSH GALLEGOS**  
KYLE ROBINSON & DE LOS SANTOS P.C.

**BETH WALTERS**

ATTORNEY | LICENSED IN TX

 214.574.8800  [WalshGallegos.com](http://WalshGallegos.com)

105 Decker Court, Suite 700, Irving, Texas 75062

**From:** Brian Morrow <b.thomas.morrow@gmail.com>  
**Sent:** Monday, January 19, 2026 10:02 AM  
**To:** Bethany Walters; Craig Wood; Meredith Walker  
**Subject:** Re: Proposed Protective Order – Superintendent Personnel File (CFBISD)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms. Walters,

We are in receipt of your request for a protective order regarding Superintendent Dr. Eldredge's personnel file.

We generally agree that a protective order is appropriate to safeguard truly sensitive personal identifiers (such as social security numbers, home addresses, and family member details) and protected medical information. We have no intention of publicizing private personal data.

However, we cannot agree to a broad or "blanket" protective order that hampers our ability to litigate the merits of this case. Given the nature of the allegations—specifically concerning transparency, Open Meetings Act compliance, and potential conflicts of interest—the Superintendent's professional performance, evaluations, and qualifications are central to the facts of the lawsuit.

We are willing to enter into an **Agreed Protective Order**, provided it adheres to the following parameters:

1. **No "Attorneys' Eyes Only" (AEO) Designation:** We will not agree to an AEO designation for the personnel file. My clients are necessary participants in the factual investigation of this case and must be permitted to review these documents to assist counsel.
2. **Public Information Act Exemption:** The order must explicitly state that documents otherwise subject to disclosure under the Texas Public Information Act (including contracts, compensation, and job descriptions) cannot be designated as "Confidential."
3. **Use in Depositions:** We must retain the right to present these documents to other relevant witnesses—including School Board Trustees and district administrators—during depositions.
4. **Narrow Tailoring:** The definition of "Confidential Information" must be narrowly tailored to specific statutory privacy interests (e.g., Texas Gov't Code § 552.102) and cannot be used to conceal professional conduct, administrative decisions, or grievances.

Please send over your proposed draft in Word format. We will redline it to ensure it meets these standards.

Regards,

Brian Morrow

Attorney for Plaintiffs

---

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**From:** Bethany Walters  
**Sent:** Wednesday, January 21, 2026 10:51 AM  
**To:** 'Brian Morrow'  
**Cc:** Craig Wood; Meredith Walker  
**Subject:** RE: Proposed Protective Order – Superintendent Personnel File (CFBISD)

Mr. Morrow,

We are not in agreement to modify the Court's standard order. We will file our motion today.

Regards,



**WALSH GALLEGOS**  
KYLE ROBINSON & DE LOS SANTOS PC

**BETH WALTERS**

ATTORNEY | LICENSED IN TX

---

 214.574.8800  [WalshGallegos.com](http://WalshGallegos.com)

105 Decker Court, Suite 700, Irving, Texas 75062

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**From:** Brian Morrow <b.thomas.morrow@gmail.com>  
**Sent:** Tuesday, January 20, 2026 5:38 PM  
**To:** Bethany Walters <bwalters@wabsa.com>  
**Cc:** Craig Wood <cwood@wabsa.com>; Meredith Walker <mwalker@wabsa.com>  
**Subject:** Re: Proposed Protective Order – Superintendent Personnel File (CFBISD)

Dear Ms. Walters,

Thank you for the clarification.

I am familiar with the Court's Standard Protective Order. However, as you noted, that standard form restricts access to "Confidential" information solely to counsel and experts. In effect, this treats *all* discovery designated as "Confidential" as "Attorneys' Eyes Only."

While that standard form may be appropriate for commercial trade secret cases, it is unworkable in this matter involving public governance and administrative decision-

making.

My clients possess necessary institutional knowledge regarding the District's history, personnel, and administrative practices—knowledge that I do not have. Preventing my clients from reviewing the Superintendent's file would fundamentally obstruct my ability to consult with them regarding the factual context of the documents produced. I cannot effectively evaluate the evidence or depose witnesses if I am barred from showing the Plaintiffs the documents to ask simple context questions such as, "Is this standard procedure?" or "Who is the individual mentioned in this review?"

We are not asking to reject the Protective Order; we are simply asking to modify the "Qualified Persons" section to include **"The Parties"** (or their designated representatives).

Please let me know if you are willing to agree to this modification. If not, we are prepared to articulate to the Court why a "Standard Order" is inappropriate for a case involving a public entity and public officials.

Regards,

Brian Morrow

Attorney for Plaintiffs

On Tue, Jan 20, 2026 at 4:38 PM Bethany Walters <[bwalters@wabsa.com](mailto:bwalters@wabsa.com)> wrote:

Mr. Morrow,

Thank you for your response. Per the Court's Standard Orders, the proposed Agreed Protective Order would be the Court's standard protective order – attached and also available [here](#). According to that order, the confidential material is limited to use by counsel in this case solely for the litigation of this matter. It also states that the confidential material may only be shown, disseminated, or disclosed to attorneys of record in the case; translators, experts, and consultants retained by counsel; and the Court. The order also outlines the method to challenge the designation of a document as confidential material.

As you have indicated that you are opposed to the terms contained in the Court's Standard Protective Order, we will file our Motion and let the Court hear the matter.

Regards,

Beth Walters



WALSH GALLEGOS

KYLE ROBINSON & DE LOS SANTOS PC

## BETH WALTERS

ATTORNEY | LICENSED IN TX

 214.574.8800  [WalshGallegos.com](http://WalshGallegos.com)

105 Decker Court, Suite 700, Irving, Texas 75062

---

**From:** Brian Morrow <[b.thomas.morrow@gmail.com](mailto:b.thomas.morrow@gmail.com)>

**Sent:** Monday, January 19, 2026 10:02 AM

**To:** Bethany Walters <[bwalters@wabsa.com](mailto:bwalters@wabsa.com)>; Craig Wood <[cwood@wabsa.com](mailto:cwood@wabsa.com)>; Meredith Walker <[mwalker@wabsa.com](mailto:mwalker@wabsa.com)>

**Subject:** Re: Proposed Protective Order – Superintendent Personnel File (CFBISD)

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We are in receipt of your request for a protective order regarding Superintendent Dr. Eldredge's personnel file.

We generally agree that a protective order is appropriate to safeguard truly sensitive personal identifiers (such as social security numbers, home addresses, and family member details) and protected medical information. We have no intention of publicizing private personal data.

However, we cannot agree to a broad or "blanket" protective order that hampers our ability to litigate the merits of this case. Given the nature of the allegations—specifically concerning transparency, Open Meetings Act compliance, and potential conflicts of interest—the Superintendent's professional performance, evaluations, and qualifications are central to the facts of the lawsuit.

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1. **No "Attorneys' Eyes Only" (AEO) Designation:** We will not agree to an AEO designation for the personnel file. My clients are necessary participants in the factual investigation of this case and must be permitted to review these documents to assist counsel.

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4. **Narrow Tailoring:** The definition of "Confidential Information" must be narrowly tailored to specific statutory privacy interests (e.g., Texas Gov't Code § 552.102) and cannot be used to conceal professional conduct, administrative decisions, or grievances.

Please send over your proposed draft in Word format. We will redline it to ensure it meets these standards.

Regards,

Brian Morrow

Attorney for Plaintiffs

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CONFIDENTIALITY NOTICE: This email & attached documents may contain confidential information. All information is intended only for the use of the named recipient. If you are not the named recipient, you are not authorized to read, disclose, copy, distribute or take any action in reliance on the information and any action other than immediate delivery to the named recipient is strictly prohibited. If you have received this email in error, do not read the information and please immediately notify sender by telephone to arrange for a return of the original documents. If you are the named recipient you are not authorized to reveal any of this information to any other unauthorized person. If you did not receive all pages listed or if pages are not legible, please immediately notify sender by phone.

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Meredith Walker on behalf of Meredith Walker  
Bar No. 24056487  
mwalker@wabsa.com  
Envelope ID: 110298056  
Filing Code Description: Motion - Protect  
Filing Description:  
Status as of 1/21/2026 3:21 PM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Craig Wood		cwood@wabsa.com	1/21/2026 12:34:45 PM	SENT
Meredith Walker		mwalker@wabsa.com	1/21/2026 12:34:45 PM	SENT
Jerome Patterson		jpatterson@wabsa.com	1/21/2026 12:34:45 PM	SENT
Anjela Young		ayoung@wabsa.com	1/21/2026 12:34:45 PM	SENT
Bethany Walters		bwalters@wabsa.com	1/21/2026 12:34:45 PM	SENT
Brian Morrow	24110136	b.thomas.morrow@gmail.com	1/21/2026 12:34:45 PM	SENT