

CAUSE NO. DC-25-09345

BRIAN MORROW, ET. AL,	§	IN THE DISTRICT COURT
	§	
Plaintiffs,	§	
	§	
v.	§	DALLAS COUNTY, TEXAS
	§	
RANDY SCHACKMANN, ET. AL,	§	
	§	
Defendants.	§	95TH JUDICIAL DISTRICT

**DEFENDANTS' PLEA TO THE JURISDICTION AND RESPONSE IN OPPOSITION
TO PLAINTIFFS' APPLICATION FOR TEMPORARY INJUNCTION**

Defendants Randy Schackmann, Nancy Brady, Cassandra Hatfield, Ileana Garza-Rojas, Marjorie Barnes, (collectively, the Defendant Trustees), Wendy Eldredge, and Carrollton-Farmers Branch Independent School District (CFBISD or the District) (collectively, the Defendants) file this Plea to the Jurisdiction, Motion to Dismiss, and Answer in Response to Plaintiffs' Original Petition for Removal and Application for Injunctive Relief filed and, in support thereof, would respectfully show the Court as follows:

I. FACTUAL BACKGROUND

CFBISD is a public school district located in Dallas County and Denton County. (Petition, ¶41). Wendy Eldredge is Superintendent of the District and has been since March 21, 2023. (Petition, ¶¶21,42). Randy Schackmann, Nancy Brady, Cassandra Hatfield, Ileana Garza-Rojas, and Marjorie Barnes are members of the District's Board of Trustees (the Board). (Petition, ¶¶15-19). The Board governs and oversees the management of the District. (Petition, ¶41).

Plaintiffs allege Randy Schackmann, Nancy Brady, and Wendy Eldredge violated prohibitions against nepotism when the District employed family members of Randy Schackmann and Nancy Brady. (Petition, ¶¶41-53). Board Policy delegates to the Superintendent final hiring authority for noncontractual employees on an at-will basis. (Petition, ¶¶39, 42). Randy

Schackmann was sworn into the Board on June 1, 2023 (Petition, ¶43). Dr. Ruth Schackmann, Randy Schackmann's wife, has been employed by the District since 2000. (Petition, ¶46; Exhibit A.3). Plaintiffs allege that, at some time during the summer of 2023, Superintendent Eldredge appointed Dr. Schackmann to the position of Coordinator of Dual Credit (Petition, ¶45). Plaintiffs allege Dr. Schackmann started her new role on July 1, 2023. (Petition, ¶45).

Plaintiffs further claim that Hunter Allton, Dr. Schackmann's son, worked with the District as an Adjunct Teacher starting in August 2023. (Petition, ¶48). Plaintiffs further assert that Mr. Schackmann and Superintendent Eldredge violated the nepotism prohibitions because the District employed and compensated Dr. Schackmann and Mr. Allton while Randy Schackmann was a member of the Board. (Petition, ¶48). Plaintiffs further assert that Superintendent Eldredge hired Niklas Brady, Nancy Brady's son, as "Assistant to the Superintendent" during the Summer of 2024. (Petition, ¶¶50-51; Exhibit A.1, A.2). Plaintiffs assert that Ms. Brady and Superintendent Eldredge violated the nepotism prohibitions because the District employed and compensated Niklas Brady while Ms. Brady was a member of the Board. (Petition, ¶50). Plaintiffs claim that Randy Schackmann's involvement in the Board's deliberations and subsequent votes to the District's 2023-2024 and 2024-2025 Compensation Plans during a special Board constitute a violation of the nepotism prohibitions because they concerned the compensation of Randy Schackmann's wife and stepson. (Petition, ¶¶44, 49).

Additionally, Plaintiffs allege that the Board engaged in "a pattern of persistent, systemic, and secretive conduct" to "shield[] its actions from the public while it devised a highly criticized plan to permanently shutter four schools" also known as the Campus Consolidation Plan (the Plan). (Petition, ¶55). Plaintiffs allege this was done by "circumventing" the Texas Open Meeting Act's (TOMA) requirements regarding meeting agendas, minutes, and open meetings. (Petition, ¶¶55-

98). As to agendas and meeting minutes, Plaintiffs allege the Board posted vague, generic, nondescript, perfunctory meeting agendas and minutes “with no description that did not provide meaningful notice to the public and were intended to “discourage public engagement (Petition, ¶¶59-60, 62, 67-68, 89).

Plaintiffs further allege the Board “deliberat[ed] through a series [of] meetings intentionally designed to circumvent TOMA.” (Petition, ¶¶62, 79) Plaintiffs claim the Board conducted “secret deliberations” with third party contractors regarding the Campus Consolidation Plan where Board members deliberated on the Plan “intentionally designed to circumvent TOMA.” (Petition, ¶¶62, 64, 79-83). Plaintiffs assert the District coordinated the meetings to “intentionally [keep] the Board attendees below a quorum.” (Petition, ¶79). Specifically, Plaintiffs assert the District’s Assistant Superintendent of Operations coordinated a series of three virtual meetings between the Board and consulting firm Woolpert Consulting (Woolpert) on February 5, February 7, and February 8, 2024, to discuss Woolpert’s “capacity and utilization study.” (Petition, ¶¶62, 64).

Plaintiffs also claim that District administrators coordinated a series of meetings with demographers Population and Survey Analysts (PASA) on January 24, January 27, and January 28, 2025, to discuss PASA’s “attendance zone plans.” (Petition, ¶79-83). Plaintiffs allege that all members of the Board attended at least one meeting with each of the third-party contractors. (Petition, ¶¶62, 80-83). However, as Plaintiffs point out, the Board held multiple regular, special, and work-study sessions concerning aspects of what would become the Campus Consolidation Plan in which Woolpert or District administrators shared information about District demographics, campus utilization, registration, rezoning, and transfer procedures for students, teachers, and staff. (Petition, ¶¶57-98)

On February 28, 2025, the Board published the agenda for the March 6, 2025 regular meeting, which Plaintiffs concede provided meaningful notice of the Board’s consideration and vote on the Plan. (Petition, ¶93). A quorum of the Board was present and they deliberated the Plan for “approximately two-hours twenty-four minutes,” which included hearing public opposition to the Plan, revisions to the Plan presented by the District, reading “prepared speeches” that raised questions or concerns regarding the Plan, and voting on the Plan. (Petition, ¶¶94-97). The Board voted to approve the Plan with six votes to approve and one vote to deny. (Petition, ¶98).

II. PLEA TO THE JURISDICTION

A plea to the jurisdiction challenges the Court’s authority to determine the subject matter of the controversy.¹ The purpose of a plea to the jurisdiction is to “defeat a cause of action without regard to whether the claims asserted have merit.”² If a trial court lacks subject-matter jurisdiction, it has no discretion and must dismiss the case.³ A court must determine at its earliest opportunity whether it has authority to allow the litigation to proceed.⁴

A. The Court lacks jurisdiction over Plaintiffs’ Petition for Removal.

On June 11, 2025, Plaintiffs filed their Petition for Removal of the Defendant Trustees and Wendy Eldredge. (Petition, ¶¶116-128). Plaintiffs assert that Randy Schackmann, Kim Brady, and Wendy Eldredge violated the nepotism prohibitions, which they argue constitutes incompetency and/or official misconduct (Petition, ¶124). Plaintiffs assert the Defendant Trustees alleged TOMA violations constitute incompetency and/or official misconduct (Petition, ¶119). Notably, Plaintiffs filed their Petition for Removal only against the Trustees who voted for the Plan.

¹ *Bland Indep. Sch. Dist. v. Blue*, 34 S.W.3d 547, 553-54 (Tex. 2000).

² *Id.* at 554.

³ *Hampton v. University of Tex. M.D. Anderson Cancer Ctr.*, 6 S.W.3d 627, 629 (Tex. App.—Houston [1st Dist.] 1999, reh’g overruled).

⁴ *Tex. Dep’t of Parks and Wildlife v. Miranda*, 133 S.W.3d 217, 226 (Tex. 2004).

Any resident of the state may initiate the proceeding for the removal of a county officer by filing a written petition for removal in a district court of the county in which the officer resides, provided the petitioner has lived in the county of filing for at least six months.⁵ Officers subject to removal under § 87.015 of the Local Government Code include “a member of the board of trustees of an independent school district.”⁶ Section 87 does not name district superintendents as officers subject to removal.⁷ That statute states that “[t]he county attorney shall represent the state in a proceeding for the removal of an officer.”⁸ The Texas Supreme Court has found that private citizens cannot maintain an ouster suit without being joined by a proper state official, stating that “[w]ithout joinder of the proper state official, the court does not have ‘jurisdiction to hear and determine the cause.’”⁹

While Defendants concede that Plaintiffs have the right to file a Petition for Removal, the Court lacks jurisdiction over this lawsuit without joinder of the county attorney. Therefore, the Court should dismiss Plaintiff’s Petition for Removal accordingly.

III. RESPONSE IN OPPOSITION TO PLAINTIFFS’ APPLICATION FOR INJUNCTIVE RELIEF

Injunctive relief is an extraordinary remedy, the purpose of which is to preserve the status quo of the litigation’s subject matter pending a trial on the merits.¹⁰ To obtain an injunction, the applicant must show: (1) a cause of action, (2) a probable right to the relief sought, and (3) a

⁵ TEX. LOCAL GOV’T CODE § 87.015(a).

⁶ *Id.* at §§ 87.012 (a), (b).

⁷ *Id.*

⁸ *Id.* at § 87.018(d) (repealed June 20, 2025). *See* 2025 Tex. Sess. Law Serv. Ch. 601 (H.B. 2715). (“The changes in law made by this Act apply *only to the removal of an officer under Subchapter B, Chapter 87, Local Government Code, for which the petition for removal is filed under that subchapter on or after the effective date of this Act.* The removal of an officer for which the petition for removal is filed before the effective date of this Act is governed by the law in effect on the date the petition is filed, and *the former law is continued in effect for that purpose.*”) (emphasis added).

⁹ *In re Wolfe*, 341 S.W.3d 932 (Tex. 2011) (quoting *Garcia v. Laughlin*, 285 S.W.2d 191, 194 (Tex. 1995) (orig. proceeding) (writ denied on other grounds).

¹⁰ *Butnaru v. Ford Motor Co.*, 84 S.W.3d 198, 204 (Tex. 2002).

probable, imminent, and irreparable injury in the interim.¹¹ The applicant bears the burden of production and must offer some evidence of each of these elements.¹² Plaintiffs seek a temporary injunction pending trial on the merits and a permanent injunction after trial. (Petition, ¶148). Plaintiffs have not met their burden to show they are entitled to this relief.

B. Plaintiffs fail to show a probable right to the relief sought.

Plaintiffs seek injunctive relief for alleged violations of TOMA “to reverse the [Defendant Trustees’] violations of TOMA, prevent [their] ongoing violations of TOMA, and require [their] compliance with [the Board’s] duties under the law.” (Petition, ¶132). Plaintiffs cannot show a probable right to this relief.

Plaintiffs must show a bona fide issue exists as to their rights to the ultimate relief sought by alleging a cause of action and presenting some evidence that tends to sustain it.¹³ Whether Plaintiffs established their right to injunctive relief pending trial on the merits is a different inquiry from whether it ultimately will be entitled to injunctive relief pursuant to its TOMA claim.¹⁴ Pleading a TOMA claim does not relieve Plaintiffs of their burden to plead and prove the elements required for injunctive relief.¹⁵

TOMA provides that “[a]n interested person [...] may bring an action by mandamus or injunction to stop, prevent, or reverse a violation or threatened violation of this chapter by members

¹¹ *Id.*; *Mattox v. Jackson*, 336 S.W.3d 759, 762 (Tex. App.—Houston [1st Dist.] 2011, no pet.).

¹² *See In re Natural Res. Conservation Comm’n*, 85 S.W.3d 201, 204 (Tex. 2002) (quoting *Camp v. Shannon*, 348 S.W.2d 517, 519 (Tex. 1961); *Dallas Anesthesiology Assocs., P.A. v. Tex. Anesthesia Group, P.A.*, 190 S.W.3d 891, 897 (Tex. App.—Dallas 2006, no pet.).

¹³ *Camp*, 348 S.W.2d at 519.

¹⁴ *Tex. Disposal System, Inc. v. City of Round Rock*, 2023 WL 3727963, at *7 (Tex. App.—Austin May 21, 2023, no pet.) (mem. op.).

¹⁵ *See id.* (citing *Salazar v. Gallardo*, 57 S.W.3d 629, 632–33 (Tex. App.—Corpus Christi–Edinburg 2001, no pet.) (requiring applicant to establish three elements for temporary injunction in context of TOMA claim); *see also Transport Co. of Tex. v. Robertson Transp., Inc.*, 261 S.W.2d 551, 552 (Tex. 1953) (stating that only question before trial court in determining whether to grant application for temporary injunction is right of applicant to preservation of status quo pending final trial of case on merits).

of a governmental body.”¹⁶ TOMA provides that “[a]n action taken by a governmental body in violation of this chapter is voidable.”¹⁷ However, TOMA only allows for the voiding of actions that were approved in violation of the Act.¹⁸ TOMA states that a governmental body “shall give written notice of the date, hour, place, and subject of each meeting held [...]”.¹⁹ However, the Act does not require that “a notice state all of the consequences that may necessarily flow from the consideration of an agenda item.”²⁰ Further, the Texas Supreme Court has held that “general notice in certain cases is substantial compliance even though the notice is not as specific as it could be.”²¹

TOMA also requires a governmental body to “prepare and keep minutes *or* make a recording of each open meeting of the body” that state the subject of each deliberation and indicate each vote, order, decision, or other action taken.²² TOMA’s general rule is that every regular, special, or called meeting of a governmental body shall be open to the public.²³ The Act prohibits a member of a Board of Trustees from knowingly engaging in at least one communication in a series of unauthorized communications that would collectively constitute a quorum which occur outside of authorized meetings, concern an issue within the Board’s jurisdiction, and would constitute a deliberation once a quorum engaged in the series of communications.²⁴ Deliberation

¹⁶ TEX. GOV’T CODE ANN. § 551.142.

¹⁷ *Id.* at § 551.141.

¹⁸ *See id.* *See e.g., Point Isabel Indep. Sch. Dist. v. Hinojosa*, 797 S.W.2d 176, 182 (Tex. App.-Corpus Christi 1990, writ denied) (emphasis added) (holding that only those actions taken in connection with defective portions of meeting notice were voidable); *Burks v. Yarbrough*, 157 S.W.3d 876, 882 (Tex.App.-Houston [14th Dist.] 2005, orig. proceeding [mand. denied]) (holding allegedly improper closed meeting did not provide basis to void subsequent payments that had been authorized at duly noticed meetings).

¹⁹ TEX. GOV’T CODE ANN. at § 551.041.

²⁰ *Tex. Turnpike Auth. v. City of Fort Worth*, 554 S.W.2d 675, 676 (Tex. 1977). (“There is no necessity to post copies of proposed resolutions or to state all of the consequences which may necessarily flow from the consideration of the subject stated.”) *See also Cox Enters., Inc. v. Bd. Of Trustees of Austin Indep. Sch. Dist.*, 706 S.W.2d 956, 959 (Tex. 1986).; *Lugo v. Donna Indep. Sch. Dist. Bd. of Trs.*, 557 S.W.3d 93, 98 (Tex. App.—Corpus Christi—Edinburg 2017, no pet.).

²¹ *Cox Enters.*, 706 S.W.2d at 959.

²² TEX. GOV’T CODE ANN. § 551.021

²³ *Id.* at § 551.002.

²⁴ *Id.* at 551.143.

is defined as “verbal or written exchange between a quorum of [the Board] or a quorum and another person, concerning an issue within the jurisdiction of the [Board].”²⁵

The Act defines meeting as a deliberation between a quorum of the Board, or a quorum and another person, during which public business or public policy over which the Board has supervision or control is discussed or considered or during which the body takes formal action.²⁶ A meeting can also be defined as a gathering conducted by the Board or for which it is responsible, at which a quorum is present, that has been called by the Board, and at which the members receive information from, give information to, ask questions of, or receive questions from any third party about the public business or public policy over which the Board has supervision or control.²⁷

Though Plaintiffs allege the Board engaged in a series of “secret deliberations” regarding the Campus Consolidation Plan, Plaintiffs also state that the Board deliberated the Plan, at times after receiving a presentation from the third-party demographer, in at least five open meetings. (Petition, ¶¶57-98). While Plaintiffs assert the Board failed to provide sufficient notice in the agenda items and meeting minutes for these public deliberations, they clearly state the subject of deliberation and whether the Board took action.²⁸ Plaintiffs also acknowledge that the Board’s ultimate deliberation and action on the Plan was taken during a duly noticed, open meeting. (Petition, ¶¶93-98). As such, Plaintiffs cannot establish that the Board took any actions in the alleged secret meetings or improperly noticed public meetings pertaining to the Plan that are voidable. Therefore, Plaintiffs’ request to void the Plan is unsupported by law. As such, Plaintiffs have not established their right to the requested relief.

C. Plaintiffs fail to show probable, imminent, irreparable injury.

²⁵ *Id.* at 551.001 (2).

²⁶ *Id.* at 511.001 (4)(A).

²⁷ *Id.* at 551.001 (4)(B).

²⁸ *See id.* at 551.041, .021.

Plaintiffs must provide proof of an imminent harm for which there must be a well-grounded probability.²⁹ Imminent harm is established by showing that the defendant will engage in the activity sought to be enjoined.³⁰ Courts do not issue injunctions based on lists of hypothetical future possibilities.³¹ Proof of an actual threatened injury, as opposed to a speculative or conjectural one, is required.³² Fear or apprehension of an injury or harm is insufficient.³³ The purpose of injunctive relief is to halt wrongful acts that are threatened or in the course of accomplishment, not to grant relief against past wrongs or to prevent wrongs not imminently threatened.³⁴

Plaintiffs have totally failed to show that any such damage is imminent or probable as to entitle them to the harsh remedy of injunctive relief. Plaintiffs have further failed to allege with particularity how or in what manner they will suffer immediate and irreparable harm. Plaintiffs list a number of alleged harms that fail to meet this standard.

D. Plaintiffs' requested relief will destroy rather than preserve the status quo.

The purpose of injunctive relief is to preserve the status quo of the litigation's subject matter pending a trial on the merits.³⁵ The status quo is the last, actual, peaceable, noncontested status that preceded the controversy resulting in the suit.³⁶ Granting Plaintiffs' requested relief will destroy, rather than preserve, the status quo.³⁷ By the time Plaintiffs' filed this lawsuit, the Board voted to approve the plan in accordance with TOMA's requirements and took action to effectuate

²⁹ *Operation Rescue-National v. Planned Parenthood of Houston and Southeast Texas, Inc.*, 975 S.W.2d 546 (Tex. 1998); *Schmidt v. Richardson*, 420 S.W.3d 442, 445-447 (Tex. App. Dallas 2014).

³⁰ *See State v. Morales*, 869 S.W.2d 941, 946 (Tex.1994).

³¹ *State v. Zurawski*, 690 S.W.3d 644, 668 (Tex. 2024).

³² *Dallas General Drivers, Warehousemen, & Helpers v. Wamix, Inc.*, 295 S.W.2d 873, 879 (Tex. 1956).

³³ *Frey v. DeCordova Bend Estates Owners Ass'n*, 647 S.W.2d 246 (Tex.1983).

³⁴ *Texas Employment Comm'n v. Martinez*, 545 S.W.2d 876, 877 (Tex. App. – El Paso 1976, no writ).

³⁵ *Warren v. Aldridge*, 992 S.W.2d 689, 690 (Tex.App.-Houston [14th Dist.] 1999, no pet.).

³⁶ *Transp. Co. v. Robertson Transps., Inc.*, 261 S.W.2d 549, 553-54 (Tex. 1953).

³⁷ *Ballenger v. Ballenger*, 668 S.W.2d 467, 469-70 (Tex. App.-Corpus Christi 1984, writ dism'd).

it ahead of the upcoming 2025-2026 school year. Therefore, the status quo that should be preserved, but instead will be destroyed by the requested injunction, is maintaining the Campus Consolidation Plan.

E. Plaintiffs’ requested relief will accomplish the whole objective of the lawsuit.

It is error for a trial court to grant a temporary injunction that accomplishes the whole object of the suit because “do[ing] so would be to determine rights without a trial.”³⁸ The whole object of Plaintiffs’ suit is the voiding of the Campus Consolidation Plan. If the District is forced to reopen closed campuses, Plaintiffs would have all the relief they seek without a trial on the merits.³⁹

F. The equities weigh in favor of denying Plaintiffs’ Application.

Because injunctive relief is an extraordinary equitable remedy, the Court should balance the equities of the parties and their resulting conveniences and hardships, including consideration of the important factor of public interest.⁴⁰ Courts may also reasonably consider delay in seeking equitable relief.⁴¹ In balancing equities, the Court may consider whether the degree of injury to the applicant would be slight or significant if the requested relief were erroneously denied and whether the injury to the opposing part would be slight or significant if the requested relief were erroneously granted.⁴² Additionally, the applicant must come into the Court with clean hands and must have acted promptly to enforce its rights.⁴³

³⁸ *Tex. Foundries, Inc. v. Int’l Moulders & Foundry Workers’ Union*, 248 S.W.2d 460, 464 (Tex. 1952).

³⁹ *See Tex. Foundries, Inc. v. Int’l Moulders & Foundry Workers’ Union*, 248 S.W.2d at 464.

⁴⁰ *Texas Disposal System, Inc.; Computek Computer & Office Supplies Inc. v. Walton*, 156 S.W. 3d 217, 2020 (Tex App – Dallas 2005, no pet.). *See also* TEX. R. CIV. P. 693 (principles of equity shall govern proceedings in injunctions when the same are not in conflict with rules or statutes).

⁴¹ *Texas Disposal Sys., Inc. v. City of Round Rock*, at *8 (Tex. App.—Austin, May 31, 2023, no pet.).

⁴² *NMTC Corp v. Conroe*, 99 S.W.3d 865, 869 (Tex. App. – Beaumont Feb. 27, 2003) (citing *Universal Health Servs., Inc. v. Thompson*, 24 S.W.3d 570, 578 (Tex. App. Austin 2000, no pet)).

⁴³ *See Foxwood Homeowners Ass’n v. Ricles*, 673 S.W.2d 376, 379 (Tex.App.—Houston [1st Dist.] 1984, writ ref’d n.r.e.).

The Board voted on the Plan on March 6, 2025. Yet Plaintiffs delayed filing suit and seeking injunctive relief until June 11, 2025. By that point, as Plaintiffs have pointed out, the District had taken action to effectuate the Plan, including closing campuses, rezoning the District, and transferring students, faculty, and staff ahead of the upcoming 2025-2026 school year. Like many other public school districts in Texas, the Board made the difficult decision, after months of deliberation, to close campuses to reckon with a budget deficit. If the Court issues an injunction requiring the reopening of the closed campuses, the District will incur millions of dollars in costs in addition to the District's deficit.⁴⁴ Additionally, it would extraordinarily disrupt District operations as well as students, families, and staff within the District. Notably, the first day of school for the District is August 12, 2025. This cannot be recovered or remedied if the Court finds for the District after a trial on the merits. As such, the balance of equities and the public interest do not favor granting such extraordinary relief.

IV. ANSWER

Subject to their Plea to the Jurisdiction, Defendants assert a general denial as authorized by Texas Rules of Civil Procedure 92 and deny each and every, all and singular, allegations contained in Plaintiffs' Petition for Removal and Application for Injunctive Relief and any supplement or amendment thereto, and demands strict proof thereof.

V. AFFIRMATIVE DEFENSES

Pursuant to Texas Rule of Civil Procedure 94, Defendants assert the affirmative defenses of laches and unclean hands. Defendants reserve the right to assert any and all affirmative defenses available and revealed through discovery in this matter. Defendants have not knowingly or intentionally waived any affirmative defenses. Defendants reserve the right to supplement and/or

⁴⁴ Defendants are prepared to present evidence to the Court regarding these hardships at a Temporary Injunction hearing.

amend their Answer and additionally reserve the right to assert any claims, counter claims, cross claims, third party claims, and/or additional defenses it may have based upon further investigation and discovery in this matter.

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request that the Court grant their Plea to the Jurisdiction and thereby dismiss the Plaintiffs' Petition for Removal and deny Plaintiffs' Application for Injunctive Relief. Defendants seek any and all additional relief to which they may be justly entitled, including attorneys' fees and costs of court.

Respectfully submitted,

By: /s/Meredith Prykryl Walker
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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 July 21, 2025.

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/s/ Meredith Prykryl Walker
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