

CAUSE NO. DC-2025-CV-1817

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IN THE DISTRICT COURT OF LUBBOCK COUNTY, TEXAS

KEVIN BASS, Plaintiff,

v.

Lori Rice-Spearman, Ph.D., in her official capacity as President of Texas Tech University Health Sciences Center;

Darrin D'Agostino, D.O., M.P.H., M.B.A., in his official capacity as Provost and Executive Vice President of Academics (Chief Academic Officer) of Texas Tech University Health Sciences Center;

Amanda McSween, in her official capacity as Managing Director of Enrollment Services and University Registrar of Texas Tech University Health Sciences Center;

Lauren Cobbs, M.D., M.Ed., F.A.C.P., in her official capacity as Senior Associate Dean for Student Affairs (School of Medicine) of Texas Tech University Health Sciences Center;

Tamara Mancini, M.Ed., in her official capacity as Director, Student Disability Services and ADA Coordinator of Texas Tech University Health Sciences Center;

Simon Williams, Ph.D., in his official capacity as Senior Associate Dean for Academic Affairs (School of Medicine) of Texas Tech University Health Sciences Center;

Mia Myers, in her official capacity as Associate Managing Director, Student Financial Aid, of Texas Tech University Health Sciences Center;

and John C. DeToledo, M.D., in his official capacity as Dean of the School of Medicine and Executive Vice President for Clinical Affairs of Texas Tech University Health Sciences Center, Defendants.

SECOND AMENDED VERIFIED ORIGINAL PETITION & APPLICATION FOR
TEMPORARY INJUNCTION (Prospective Official-Capacity Relief Only; No Damages)

TO THE HONORABLE COURT:

Plaintiff Kevin Bass files this verified second amended petition, seeking prospective, official-capacity relief only: (1) a prompt, public name-clearing/FERPA-amendment hearing; and (2) annotation/correction of education records so future disclosures append the corrective hearing record or, if no change is ordered, Plaintiff's statement. No damages are sought.

I. PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Kevin Bass is a resident of Lubbock County, Texas.
2. Defendants are TTUHSC officials sued only in their official capacities for prospective relief:
 - a. Lori Rice-Spearman, Ph.D., President (appoints hearing official/committee for FERPA amendment hearings).
 - b. Darrin D’Agostino, D.O., M.P.H., M.B.A., Provost & EVP of Academics (EVPAA) (receives/acts on amendment requests and arranges hearings).
 - c. Amanda McSween, Managing Director of Enrollment Services & University Registrar (custodian of academic records/transcripts; implements annotations/appendments).
 - d. Lauren Cobbs, M.D., M.Ed., F.A.C.P., Senior Associate Dean for Student Affairs, School of Medicine (school-level implementation/scheduling coordination).
 - e. Tamara Mancini, M.Ed., Director, Student Disability Services and ADA Coordinator. She is sued in her official capacity only. In addition to overseeing Student Disability Services and coordinating ADA/§ 504 accommodations at the hearing, she serves as TTUHSC’s ADA Coordinator for Title II purposes, with central, policy-level responsibility under 28 C.F.R. § 35.107 for coordinating and enforcing Title II compliance across TTUHSC, including ensuring that grievance and hearing procedures—such as the requested name-clearing/FERPA-amendment hearing—are accessible and ADA-accommodated.
 - f. Simon Williams, Ph.D., Senior Associate Dean for Academic Affairs, School of Medicine (school-level implementation for academic status processes).
 - g. Mia Myers, Associate Managing Director, Student Financial Aid. She is sued in her official capacity only. Plaintiff alleges that her office maintains and transmits Title IV/enrollment-status reporting and status-based holds, including those driven by the dismissal notation and transcript entries challenged here, and that she is therefore a necessary official-capacity implementer to ensure that any ordered correction/annotation of status is reflected consistently in financial-aid/status interfaces and third-party reporting.
 - h. John C. DeToledo, M.D., Dean, School of Medicine and Executive Vice President for Clinical Affairs. He is sued in his official capacity only. Plaintiff alleges that, for School of Medicine academic status and MSPE-type entries, the Dean received the Student Conduct Board’s findings, reviewed the determination, implemented the dismissal decision, and previously concurred in School-of-Medicine–level consequences (including MSPE notation). He is a necessary official- capacity implementer for aligning School-of-Medicine–level records and communications with the outcome of the requested name-clearing/FERPA-amendment process.

For service of process on each official:

Texas Tech University Health Sciences Center, 3601 4th Street, Lubbock, Texas 79430 (their usual place of business).

3. Jurisdiction & Venue. This Court has jurisdiction over claims for prospective relief requiring state officers to comply with constitutional/statutory duties (*ultra vires*). Venue is mandatory in Lubbock County because this suit primarily seeks injunctive relief against resident state officers. Tex. Civ. Prac. & Rem. Code § 65.023(a). Governmental immunity does not bar prospective, official-capacity *ultra vires* claims. See, e.g., *City of El Paso v. Heinrich*, 284 S.W.3d 366 (Tex. 2009).

II. INTRODUCTION AND NATURE OF THE ACTION

4. University officials portrayed Plaintiff as “threatening” or otherwise dangerous and used that portrayal to impose Emergency Removal and a criminal trespass warning. TTUHSC’s own records frame Plaintiff’s November 3, 2023 tweet in terms of a “perceived” or “potential” threat based on some individuals’ subjective reactions, yet that “threat” narrative was embedded in official channels and foreseeably reached third parties.

5. Plaintiff repeatedly requested a public, on-the-record opportunity to clear his name and to correct or annotate affected records; officials did not provide that process.

III. FACTS (Dates/Actors/Quotes Included)

A. Government publication (official channels; class-wide broadcast)

6. On October 19, 2025, Plaintiff requested a public name-clearing hearing, interim transcript relief, ADA/§ 504 accommodations, and preservation; the request set an October 21, 2025, 5:00 p.m. CT deadline to identify the scheduling official and procedures. The deadline passed without the required action.

7. Around this period, official statements were disseminated to students and other recipients. Two publications are central: (i) on January 1, 2024, a public-facing post stated that a committee had voted to expel Plaintiff; and (ii) at 7:46 a.m. on January 7, 2024, the Assistant Vice Dean for Student Affairs sent a class-wide broadcast stating “we are one student lighter than last week,” instructing recipients to “check his Twitter.” System records reflect a recall attempt of that message. These are agency publications, not private rumor.

B. Status change, exclusion measures, and the “threat” narrative (Emergency Removal, CTW, and “perceived threat” language)

8. Plaintiff’s November 3, 2023 social-media post on X (formerly Twitter) was a short philosophical reflection on mortality and the human condition. The post stated, in substance, that “each and every one of us is going to be dead someday very, very soon” and that “these other people, too, are going to be dead very, very soon.” It did not reference Texas Tech University

Health Sciences Center (“TTUHSC”), did not name any person, and did not call for or threaten violence against anyone.

9. Plaintiff has sworn that this post “was a philosophical commentary on mortality and the human condition,” not a threat directed at any individual, and that he has “never threatened or harmed any person at TTUHSC or elsewhere in connection with these events.” He further states he has never been arrested, charged, or investigated for any violent act or threat related to TTUHSC or his social-media activity, and no restraining or protective order has ever issued against him in connection with these matters.

10. Nevertheless, TTUHSC activated its Threat Assessment process and, on November 4, 2023, issued an Emergency Removal letter citing alleged violations of Code of Conduct provisions prohibiting “physical harm or threat of harm to any person” and “behavior that disrupts the normal operation of the University” and invoking a judgment that Plaintiff’s presence “could” endanger others or significantly disrupt operations.

11. In the associated Interim Suspension/Threat Assessment Questionnaire, TTUHSC officials described the November 3 post as a “threatening post,” recorded that “several faculty members and staff” contacted administration “expressing concern for personal safety,” and asserted a “significant and articulable threat to the health or safety of” university community members based on “the perceived threat within the post on X.” At the same time, the same form checked “No” when asked whether the matter involved “criminal felony charges related to weapons, drugs, aggravated assault, and/or terroristic threats.”

12. None of the Threat Assessment paperwork identifies any weapon, plan, specific target, or concrete act of violence. Instead, it relies on unnamed faculty and staff who felt “concern for personal safety” after viewing Plaintiff’s philosophical tweet and on generalized references to “tension and concern for the safety of members of the university.”

13. TTUHSC’s December 27, 2023 Student Conduct Board determination letter repeats and formalizes this security framing. The Board notes that Plaintiff is active on social media, that many in the TTUHSC community follow him, and that when he sent the tweet he had pending professionalism complaints and grievances. It concludes that “it was reasonable and foreseeable that members of the TTUHSC community would be highly concerned when they read his tweet and may fear for his safety and the safety of others,” and that “multiple witnesses at the hearing stated that they were concerned for their safety when they saw Dr. Bass’s tweet.”

14. On that basis, the Board recites that, “[b]ased on input from the Threat Assessment Team,” the Senior Associate Dean determined Plaintiff’s “behavior justified his emergency removal” because “the physical or emotional well-being of a student or other members of the University community could be endangered or the presence of the student could significantly disrupt the normal operations of the university.”

15. The Board then states that Plaintiff's tweet violated Code of Conduct Part II.D.5.a, which "prohibits the threat of harm to any person," along with provisions on disruptive or hostile behavior and professional relationships. Yet its own written finding characterizes the tweet only as "disruptive and reasonably perceived as a potential threat to members of the TTUHSC community," not as an actual threat or expression of intent to harm anyone.

16. TTUHSC's documents repeatedly use qualifiers such as "perceived threat," "potential threat," "may fear," and "concern for personal safety," rather than finding that Plaintiff actually threatened violence. The Interim Suspension materials themselves describe faculty and staff as expressing "a high degree of concern with the perceived threat within the post on X," again framing the tweet as something some viewers perceived as threatening, not as a direct or explicit threat.

17. Plaintiff emphasizes this distinction, noting that the TTUHSC Student Conduct Board's own findings characterize the post as a 'perceived threat' and 'potential threat' — not an actual threat, and that the Board acknowledged that reasonable people could interpret the post differently. Plaintiff denies that any reasonable observer, viewing the tweet in context, would interpret it as a genuine threat of violence.

18. Plaintiff alleges that TTUHSC's own conduct is inconsistent with a genuine belief that he posed an immediate danger. During the same period in which TTUHSC invoked "threat" language and imposed Emergency Removal and a Criminal Trespass Warning ("CTW"), administrators continued to meet with Plaintiff personally. The Associate Dean of the School of Medicine met Plaintiff alone off campus at a sandwich shop, and the Assistant Dean offered to meet with him personally; no administrator ever declined a meeting on the ground that they feared he would cause physical harm. Plaintiff, for his part, took care to avoid unnecessary contact with faculty who had made such allegations about him, based on prior experiences in which he believed similar accusations had been made unfairly.

19. When TTUHSC later held a consolidated disciplinary hearing on December 11, 2023, Plaintiff arrived and entered the building without being searched; no one searched his person, bags, or pockets at any point; he observed no uniformed police or security stationed inside or immediately outside the hearing room; and faculty, administrators, and Board members sat in close proximity to him throughout an approximately 14-hour hearing with no special physical barriers or protective measures.

20. The CTW and Emergency Removal were temporary measures that expired by their own terms. Plaintiff was not required to apply for reinstatement, submit to a psychological evaluation, prove he was "no longer a threat," or take any remedial action before those restrictions lapsed, and TTUHSC did not re-issue any trespass warning or other security-related limitation after expiration. Plaintiff contends that the expiration of these measures, without any additional

showing that he had become “safe,” is inconsistent with a belief that he posed a continuing threat of violence.

21. While the CTW was in effect, Plaintiff was required to coordinate any campus presence through Texas Tech Police (including CDRC drop-off/pick-up), often resulting in visible police escort. That visible involvement signaled to others that Plaintiff was dangerous, causing stigma and humiliation and deterring him from visiting campus-based witnesses or offices to gather evidence. The Emergency Removal/CTW thus imposed practical burdens on ordinary activities and on case preparation—part of the “status-change” plus—while the ongoing reputational harm and publication are addressed below.

22. In contemporaneous correspondence challenging the CTW, Plaintiff wrote that TTUHSC was treating his tweet as a threat to kill colleagues and that he could face criminal charges if he did not contact police each time he dropped off his three-year-old child at daycare.

23. In July 2023, following Plaintiff’s psychiatry rotation, resident physician Caroline Fernandes submitted a report concerning Plaintiff, and Assistant Dean Elisabeth Conser, acting as a mandated reporter, submitted a “Sexual Harassment / Sexual Assault / Sexual Misconduct Report” that categorized the matter as “sexual or gender-based harassment” and described it as a “situation involving sexual harassment” in connection with that rotation. Those documents are part of Plaintiff’s internal file.

24. Plaintiff denies that he has ever sexually harassed any person at TTUHSC or elsewhere. He alleges that TTUHSC later addressed the same underlying events through professionalism and student conduct processes rather than through a formal Title IX hearing, and that records referring to the Fernandes report and its sexual-harassment categorization remain in the materials used in connection with his dismissal.

25. Plaintiff is aware of public commentary by at least one physician stating that “Kevin Bass received sexual harassment complaints and had made threats of violence before he was kicked out of medical school.” Plaintiff alleges that this description is inaccurate but that it reflects how some observers have understood the combination of internal reports and the “threat” narrative described above.

26. Plaintiff further alleges that he has never been afforded a focused, public name-clearing hearing on the combined “threat” narrative and the sexual-harassment/“sexual harassment complaints” narrative that now follows him in public commentary. The Threat Assessment process was ex parte and relied on undisclosed reports from “several faculty members and staff”; Plaintiff was not present, did not see those reports, and had no opportunity to present witnesses or evidence in his defense before Emergency Removal and the CTW were imposed.

27. The later December 11, 2023 consolidated disciplinary hearing, while lengthy, was not structured or noticed as a public name-clearing proceeding. Disability-related evidence was

treated as outside the scope, Plaintiff's neuropsychological evaluator was not permitted to testify, attorney advisors were barred from directly questioning witnesses, and deliberations occurred off the record under the direction of the attorney retained by the university. Plaintiff had no meaningful ability to create a public, on-the-record account responding to the "threat" framing or to the way sexual-harassment accusations and "unprofessional behavior" labels were discussed alongside threats of violence and dismissal. Plaintiff further alleges that the same pattern pervaded virtually all related grievance and mistreatment processes: he filed multiple grievances, but investigators relied on others' accounts while declining to interview him, while treating the grievances as a form of aggression. For example, the November 7, 2023 SOM OP 40.05 memorandum by Assistant Dean J. Edward Bates reports interviews with Dr. Fernandes, the Title IX Coordinator, Dr. Trotter, and another resident, but not with Plaintiff himself, even as it concludes that the resident's complaint was filed in "good faith" and characterizes Plaintiff's grievance as a policy violation and potential retaliation. Plaintiff alleges that this was representative of a broader pattern in which TTUHSC interviewed and credited complainants and administrators, but did not interview him, leaving only their accounts in the record.

28. In his written hearing-request rationale regarding the Fernandes report, Plaintiff recounts that before filing his grievance he sought guidance from multiple senior administrators—including Drs. Conser, Trotter, Perrin, and Erwin, as well as Title IX personnel—expressly asking whether and how to file and what the consequences might be; he alleges that none of them warned him that doing so could be treated as retaliation, and that he acted in good faith to defend his reputation against what he viewed as a false and humiliating sexual harassment accusation. He further alleges that throughout this period he repeatedly asked supervising physicians for feedback, often daily, and was told that he was doing well, only to later receive "professionalism" and "unprofessional behavior" allegations without prior warning or meaningful remedial guidance. Plaintiff contends that embedding disputed "threat," sexual harassment, and "unprofessional behavior" narrative language in education records and communications—while declining to convene a dedicated, public name-clearing/FERPA-amendment hearing and declining to interview him in grievance investigations—constitutes the core due-course-of-law violation at issue.

C. Clinical evaluations, internal conflicts, and dissemination to third parties

29. Plaintiff's medical-education record also includes narrative clinical evaluations and letters of recommendation. TTUHSC maintains these materials as part of his education file and may transmit them to third-party institutions, including other medical schools, in response to records requests. Plaintiff alleges that some of these evaluations contain unfavorable characterizations of his professionalism and mental health and that he seeks an opportunity to correct or annotate those characterizations through the processes described below.

30. During the relevant period, Plaintiff completed core clerkships in psychiatry, obstetrics and gynecology ("OB/GYN"), and pediatrics. His psychiatry clerkship evaluation was uniformly

positive, praising his clinical performance, knowledge, and professionalism, and resulted in a strong letter of recommendation.

31. In OB/GYN, one faculty evaluator described Plaintiff as eager and hard-working but recorded concerns about his “professionalism” and related issues. Those concerns were later reviewed in connection with Plaintiff’s first appeal following the December 11, 2023 hearing. Plaintiff alleges that TTUHSC ultimately cleared him of professionalism charges arising from that evaluation, yet TTUHSC has continued to rely on the OB/GYN evaluation in internal and external narratives as if its professionalism concerns were undisturbed findings of unprofessional conduct.

32. In pediatrics, TTUHSC now emphasizes a failing clerkship evaluation that labels Plaintiff as unprofessional, raises vague concerns about his “mental health,” and states that he should not be permitted to advance in medical school. Plaintiff alleges that this evaluation was authored by the same faculty member about whom he had previously filed formal grievances for bullying and retaliatory conduct and who reported his November 3, 2023 tweet as a “threat,” and that it was written after TTUHSC had already removed him from campus on that basis. Plaintiff contends that this conflict of interest and prior history materially influenced the tone and content of the pediatrics evaluation.

33. By contrast, a different pediatrics attending who supervised Plaintiff at an off-site clinical location and was not involved in the events leading to Plaintiff’s emergency removal initially expressed reservations about Plaintiff during the first week of that rotation but, after observing his performance over time, later rated him highly and subsequently provided a strong letter of recommendation. Plaintiff alleges that this independent, off-site evaluation shows that the on-campus pediatrics evaluation was not representative of how other pediatrics faculty assessed his clinical work when they were not participating in the same internal conflict.

34. Plaintiff alleges that TTUHSC has selectively maintained and disseminated the most stigmatizing portions of these clerkship evaluations—including the on-campus pediatrics evaluation—while downplaying or omitting the later clearing of OB/GYN professionalism concerns, the positive psychiatry evaluation, and the favorable off-site pediatrics evaluation and recommendation. When these selective disclosures are combined with the “threat” narrative and the externally circulated shorthand that he was dismissed amid “sexual harassment” complaints and “threats of violence,” they reinforce a narrative that Plaintiff is professionally unfit and mentally unstable.

35. Plaintiff further alleges that these clinical evaluations and letters, as maintained and transmitted by TTUHSC and its officials, are “education records” and “personal information” within the meaning of FERPA and Tex. Gov’t Code § 559.004, and that he is entitled to a process to correct, annotate, or append his own statement to the portions he contends are inaccurate, misleading, or maintained in violation of privacy rights.

D. Present-tense dissemination via official records (transcript notation; third-party recipients)

36. On October 16, 2025, TTUHSC issued an official transcript listing “Administrative Dismissal Effective 01-11-2024.” That notation was transmitted to third-party institutions; at least one recipient declined to offer an interview. This is ongoing publication via official records, warranting annotation/appendment of a corrective hearing record to any future disclosure.

E. ADA/§ 504 context (notice; policy anchors; why prior process was not a name-clearing hearing)

37. Plaintiff gave Student Disability Services notice on December 8, 2023 and requested accommodations consistent with TTUHSC policy. The prior internal proceeding did not function as a public name-clearing hearing: accommodations evidence was treated outside scope, questioning was time-limited, and recording ceased before deliberations.

F. Request and denial (element satisfied)

38. Plaintiff requested a name-clearing hearing (¶ 6); the October 21 deadline passed without scheduling, and subsequent follow-ups failed to secure the hearing. Request and denial are adequately alleged.

IV. CLAIMS FOR PROSPECTIVE RELIEF (Official-Capacity Only; No Damages)

COUNT 1 — Texas Due Course of Law (Tex. Const. art. I, § 19): Stigma-Plus / Name-Clearing

39. Government publication of false or misleading, stigmatizing charges tied to a status change — including narratives that Plaintiff posed a safety threat and that he was dismissed amid sexual-harassment complaints and supposed “threats of violence,” as now described in public commentary—triggers a right to a public name-clearing hearing and to a corrective record appended to future disclosures.

COUNT 2 — Ultra Vires Injunctive Relief (Prospective Only)

40. Under TTUHSC’s Student Education Records policy (HSC OP 77.13 or successor), the EVPAA (Provost) or designee must arrange a hearing upon request, and the President or designee must appoint the hearing official/committee. If no change is ordered, the student’s statement must be maintained with, and disclosed with, the contested portion. The Registrar must implement any ordered corrections/annotations to education records and transcripts. Defendant Mancini, as Director of Student Disability Services and ADA Coordinator, has central, policy-level responsibility for coordinating Title II compliance and ADA/§ 504 accommodations, including ensuring that any name-clearing/FERPA-amendment hearing is accessible and reasonably accommodated. The Senior Associate Dean for Student Affairs and the Senior Associate Dean for Academic Affairs must implement school-level scheduling and academic-status changes flowing from the hearing outcome. The Dean of the School of Medicine must

align School-of-Medicine–level records and MSPE-type communications with the outcome of the hearing and any appended student statement. The Associate Managing Director for Student Financial Aid must ensure that any corrected/annotated status is reflected consistently in Title IV/enrollment-status reporting, holds, and related financial-aid communications. Defendants with these duties act without legal authority when they refuse to perform them or decline to implement lawful correction/annotation and associated accommodations. Prospective injunctions should compel compliance.

COUNT 3 — Statutory Annotation/Correction (Tex. Gov’t Code § 559.004)

41. Section 559.004 requires a reasonable correction/annotation procedure for incorrect personal information. Refusal to apply that procedure warrants prospective orders implementing it here, including appendment of the hearing record or student statement to any future disclosure.

42. TTUHSC’s own published policies and notices acknowledge and purport to implement these statutory duties. In its privacy notice “Concerning Your Information,” TTUHSC tells individuals that they may request that TTUHSC revise information that is incorrect by contacting the office that maintains the information. TTUHSC’s Student Education Records policy, HSC OP 77.13, and the student-facing Student Handbook further describe a formal “Student’s Request to Amend Records” process: the student may request amendment of education records believed to be inaccurate, misleading, or in violation of privacy rights; if the request is denied, the EVPAA/Provost (or designee) must arrange a hearing, the President (or designee) must appoint an impartial hearing official or committee, and if no change is ordered, the student has the right to place a written statement in the record that must be maintained with, and disclosed with, the contested portion in all future disclosures. TTUHSC’s 2012–2013 Student Handbook also expressly cites Tex. Gov’t Code § 559.004 in describing students’ rights to correct or amend records. Despite Plaintiff’s written requests seeking correction and annotation of the dismissal notation and related education records, Defendants have not afforded Plaintiff this promised correction/annotation process or appended any student statement to the disclosures at issue.

V. APPLICATION FOR TEMPORARY INJUNCTION

43. Probable right to relief: ¶¶ 6–42 allege stigmatizing publication, status change, falsity, lack of an adequate prior public hearing, request, and denial.

44. Probable, imminent, irreparable injury; no adequate remedy at law: Ongoing dissemination of disputed stigma via official records/transcripts to third parties is non-compensable reputational and opportunity harm; Plaintiff seeks equitable process. Although the CTW has expired, the current harm arises from TTUHSC’s ongoing dissemination of stigmatizing information through official records/transcripts to third parties, which equitable relief can remedy by ordering a public name-clearing/FERPA amendment hearing and record annotation.

45. Requested interim relief pending final judgment: (a) Order the President (or designee) to identify and appoint the hearing official/committee by a date certain, and order the EVPAA/Provost (or designee), in coordination with Defendant Mancini in her role as ADA Coordinator and Director of Student Disability Services, to schedule a public name-clearing/FERPA-amendment hearing on a near date certain, with ADA/§ 504 accommodations coordinated by Student Disability Services. (b) Order the Registrar to implement a neutral interim transcript notation stating “Disputed; correction/annotation process pending” until the hearing occurs, and after the hearing, to append the corrective hearing record (or, if no change is ordered, Plaintiff’s statement) to any future disclosure of the affected record(s). (c) Preservation of relevant records. (d) Bond: set a nominal bond under TRCP 684.

VI. PRAYER

46. Plaintiff asks the Court to: (a) order a prompt, public, ADA-accommodated name-clearing/FERPA amendment hearing under HSC OP 77.13, with a preserved public record; (b) order implementation of Tex. Gov’t Code § 559.004 by directing the Registrar to correct or annotate records so any future transcript/records disclosure includes the corrective hearing record or Plaintiff’s statement, and by directing: (i) the Dean of the School of Medicine to align School-of-Medicine–level records and MSPE- type communications with the outcome of the hearing and any appended student statement; (ii) the Associate Managing Director for Student Financial Aid to ensure that any corrected/ annotated status is reflected consistently in Title IV/enrollment-status reporting, holds, and related financial-aid communications; and (iii) Defendant Mancini, in her capacity as ADA Coordinator and Director of Student Disability Services, to ensure that the hearing and related procedures remain accessible and ADA/ § 504-accommodated; (c) tax costs; and (d) grant such further prospective relief as justice requires.

Respectfully submitted,

/s/ Kevin Bass

Kevin Bass (pro se)

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Note regarding timing: Plaintiff originally transmitted this petition for electronic filing through the eFileTexas system on November 5, 2025, at approximately 12:00 a.m. Central Time—within minutes of the target date of November 4, 2025. Because the original envelope was later rejected for procedural reasons (caption, filing office, and signature block), Plaintiff re-filed promptly in the correct form and venue. This note is included to demonstrate diligence and good-faith compliance; Plaintiff does not concede any untimeliness.

VERIFICATION (Tex. Civ. Prac. & Rem. Code § 132.001)

My name is Kevin Bass. My date of birth is 12/07/1984. My address is [REDACTED]

[REDACTED] I declare under penalty of perjury that the facts stated in paragraphs 6–42 of this Second Amended Petition are true and correct.

Executed in Lubbock County, Texas, on 12/11, 2025.

Kevin Bass Kevin Bass