

CAUSE NO. DC-2025-CV-1817

TB

KEVIN N. BASS,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	LUBBOCK COUNTY, TEXAS
v.	§	
	§	
DARRIN D'AGOSTINO, D.O., M.P.H.,	§	
M.B.A.,	§	
in his official capacity as Provost and	§	
Executive Vice President of Academics of	§	
Texas Tech University Health Sciences	§	237th JUDICIAL DISTRICT
Center; and	§	
AMANDA McSWEEN, in her official	§	
capacity as	§	
Managing Director of Enrollment Services	§	
and University Registrar of Texas Tech	§	
University Health Sciences Center,	§	
	§	
Defendants.	§	

FOURTH AMENDED VERIFIED ORIGINAL PETITION

(Limited OP 77.13 + Tex. Gov't Code § 559.004

Record-Procedure Relief Only; Prospective

Official-Capacity Relief Only; No Damages;

No Federal Causes of Action)

TO THE HONORABLE COURT:

Plaintiff Kevin N. Bass (pro se) files this Fourth Amended Verified Original Petition and alleges as follows:

I. PARTIES / SERVICE

1. Plaintiff Kevin N. Bass is a resident of Lubbock County, Texas.
2. Defendants are officials of Texas Tech University Health Sciences Center ("TTUHSC") sued only in their official capacities for prospective relief. Defendants are named because HSC OP 77.13 and Tex. Gov't Code § 559.004 impose or contemplate discrete, ministerial, non-discretionary procedural roles necessary to implement the

inspection/review and written-response steps invoked by Plaintiff's December 30, 2025 request--specifically: (i) the EVPA's limited assistance function when a student is uncertain where responsive education records are maintained, and (ii) the University Registrar's custodial processing of transcript-related education-record inspection/review logistics and the related amendment/annotation and dispute-statement procedure steps. Defendants are:

- a. Darrin D'Agostino, D.O., M.P.H., M.B.A., Provost and Executive Vice President of Academics ("EVPA"); and
- b. Amanda McSween, Managing Director of Enrollment Services and University Registrar.

Plaintiff does not seek relief based on generalized supervisory authority alone.

3. For service of process, Plaintiff requests that the District Clerk issue citation for each Defendant upon request and that service of citation and a copy of the petition be accomplished in accordance with Tex. R. Civ. P. 99, 103, and 106. Plaintiff requests service at TTUHSC's principal place of business, Texas Tech University Health Sciences Center, 3601 4th Street, Lubbock, Texas 79430, unless the clerk or authorized server requires a different address for a particular Defendant.

II. JURISDICTION / VENUE

4. This Court has subject-matter jurisdiction over claims seeking prospective injunctive relief against state officials to compel performance of non-discretionary legal duties and to cease ultra vires conduct. Plaintiff seeks only prospective relief and no damages.
5. Jurisdictional facts (immunity-exception path). Plaintiff's requested relief is limited to prospective orders compelling officials to implement a reasonable education-record inspection/review and written-response procedure required by Tex. Gov't Code § 559.004 as implemented through TTUHSC's published OP 77.13. This Petition challenges only the post-December 30, 2025 implementation mechanics alleged below and does not require this Court to decide the accuracy of any record content or the

merits of any underlying decision. Plaintiff pleads that, under the escorted in-person format and restrictions alleged below, he cannot complete inspection/review and submit a sufficiently precise amendment/annotation request within OP 77.13's time-limit structure, and the requested prospective order would redress that procedural injury.

6. Venue is proper in Lubbock County because Plaintiff seeks injunctive relief against Defendants, and a writ of injunction is tried in the county where the party against whom the writ is sought is domiciled. Defendants are domiciled in Lubbock County, Texas. See Tex. Civ. Prac. & Rem. Code § 65.023(a).

III. LIMITED SCOPE / NON-DUPLICATION / NO FEDERAL CLAIMS

7. FIREWALL / PROCEDURE-ONLY SCOPE LOCK. This action challenges only Defendants' post-December 30, 2025 implementation of the ministerial inspection/review and response mechanics required by TTUHSC HSC OP 77.13 and Tex. Gov't Code § 559.004. Plaintiff seeks only prospective official-capacity relief compelling a workable, reasonable, non-unduly burdensome procedure. Plaintiff seeks no damages.

NO MERITS / NO ACCURACY / NO FEDERAL ISSUES. Plaintiff does not ask this Court to decide whether any disputed education-record item is true, false, accurate, or justified; does not ask this Court to adjudicate the merits of any underlying disciplinary decision or exclusion measure; and asserts no federal cause of action and requests no adjudication of any federal-law issue. Any mention of other proceedings is for scope clarification only and is not intended to adopt or incorporate another pleading's allegations.

8. As used in this Petition, "education records" means only those student education records governed by TTUHSC's published Student Education Records procedure (HSC OP 77.13) and the related state-law record-procedure obligations discussed herein.

IV. FACTS (EDUCATION-RECORD ACCESS AND RECORD-PROCEDURE COMPLIANCE)

Plaintiff pleads only the post-December 30, 2025 facts necessary to show whether Defendants are implementing a workable, reasonable inspection/review and written-response procedure under OP 77.13 and Tex. Gov't Code § 559.004. Plaintiff seeks only prospective procedure relief and no damages, and does not ask this Court to decide the accuracy of any education-record content or the merits of any underlying decision. Any reference to other proceedings is for scope clarification only and is not intended to adopt another pleading's allegations.

9. TTUHSC is a "state governmental body" within the meaning of Tex. Gov't Code § 559.001.

TTUHSC maintains Plaintiff's education records, including his official transcript.

10. TTUHSC has issued official transcripts for Plaintiff showing the notation "Administrative Dismissal Effective 01-11-2024" (or substantially similar wording). The disputed notation is republished to third parties each time an official transcript is requested or issued, including through TTUHSC's electronic transcript-verification service. Plaintiff disputes that record item and invokes the OP 77.13 / § 559.004 procedure concerning that disputed record item. Plaintiff's dispute is presented here only to identify the record item that triggers OP 77.13 / § 559.004 procedures; Plaintiff does not ask this Court to determine whether the notation is true or false or to direct any substantive change to the transcript record.

11. TTUHSC has published a Student Education Records policy (HSC OP 77.13) providing:

- a. a right to inspect and review education records upon a written request, including a requirement that the records custodian arrange access for inspection and review within forty-five (45) days of receipt of a proper written request and notify the student of the time and place for inspection;
- b. a procedure to request amendment of education records, requiring the student to identify the part of the record at issue and specify the student's basis for requesting amendment or annotation;

- c. if amendment is denied, the right to request a hearing under OP 77.13;
- d. a post-decision dispute-statement remedy requiring that a student's written statement be maintained with the contested portion and disclosed whenever the contested portion is disclosed; and
- e. that a student's written access request must identify, as precisely as possible, the record(s) the student wishes to inspect, and that copies of written access requests are to be maintained in the student file in which the requested education record is maintained.

12. OP 77.13 provides that if a student is uncertain what office maintains the education records at issue, the student may submit a written request for assistance to the EVPA. Plaintiff seeks relief under this step only to the extent the OP 77.13 condition is met and/or the EVPA has received such a request.
13. On December 30, 2025, Plaintiff submitted a written request invoking OP 77.13 and Tex. Gov't Code § 559.004 to inspect and review the education-record materials relating to the dismissal notation and to initiate the OP 77.13 correction/annotation process. For clarity, the "education-record materials" and "responsive set" referenced in this Petition are limited to the education-record materials relating to the transcript notation identified in ¶10.
14. Before Plaintiff's formal December 30, 2025 written request, TTUHSC offered Plaintiff limited, time-restricted remote inspection/review sessions and imposed restrictions prohibiting recording, photographing, or otherwise capturing the content shown. In a one-hour remote session on December 12, 2025, Plaintiff was able to review only approximately 20 items from the responsive set that ultimately comprised approximately 1,600 records. At least one remote session was offered with less than 24 hours' notice.
15. Since Plaintiff's December 30, 2025 request, Defendants have offered only limited, escorted in-person inspection/review sessions and have rescheduled or postponed sessions. Under the current session format and postponements, Plaintiff has not been provided a workable opportunity to complete inspection/review of the responsive set

within a reasonable period or on a schedule reasonably calculated to permit completion within OP 77.13's stated time limits.

16. In written scheduling communications implementing the inspection/review step, TTUHSC's Registrar's office limited Plaintiff's review to escorted, in-person viewing at a designated location within a 9:00 a.m. to 4:00 p.m. window, subject to the following conditions: (i) Plaintiff would not be permitted to take any action that may create a copy of any document; (ii) a TTUHSC staff member would be present at all times as an escort; (iii) the door to the review room was required to remain open at all times; and (iv) the inspection laptop was required to be surrendered any time Plaintiff left the room, including for restroom breaks.

17. Plaintiff responded that he could attend the offered multi-day inspection sessions under the outlined conditions, while requesting a neutral documentation approach so he could document what he was shown for purposes of identifying the disputed record components "as precisely as possible" for the subsequent written-request steps.

18. In confirming the inspection protocol, TTUHSC's Registrar's office denied Plaintiff's request to have a third-party observer present during inspection/review and denied Plaintiff's request to make an audio recording during inspection/review. Plaintiff also requested that his spouse be allowed to attend as an observer and provided a signed FERPA consent form under 34 C.F.R. § 99.30 designating her as an authorized recipient, but the request was denied. Plaintiff requested written policy basis for any refusal; none was provided. The Registrar's office further stated: "Failure to follow the established protocol will result in you forfeiting the ability to review your record until you can comply with the protocol."

19. TTUHSC's Registrar's office scheduled the in-person inspection/review sessions for January 5, 6, and 8, 2026, and later added an additional in-person session on January 7, 2026, all within the 9:00 a.m. to 4:00 p.m. window described in ¶16.

20. During the January 5-8, 2026 sessions, Plaintiff was presented with approximately 1,600 or more individual education-record items spanning approximately 1,500 pages for review during the four-day escorted window. These included emails, memoranda, forms, evaluations, policies, and correspondence. Under the restrictions described in ¶16-18--no copies, no recording, no third-party observer, handwritten notes only, laptop surrendered for each restroom break--Plaintiff was unable to complete a comprehensive review of the full responsive set and was unable to identify all disputed record components "as precisely as possible" as OP 77.13 contemplates for an amendment/annotation request.

21. The production also included a video recording of the December 11, 2023 dismissal hearing, which lasted approximately 14 hours. During a prior review session limited to audio playback, the hearing recording displayed apparent discontinuities in the audio record. The video was available for viewing on the inspection laptop under the same conditions: no copies, no recording, no observer, and mandatory laptop surrender upon leaving the room. Given the volume of document records to review, the four-day time constraint, and the conditions imposed, Plaintiff was unable to meaningfully review the 14-hour hearing video while also inspecting the approximately 1,600 document records. Plaintiff has not had the opportunity to review the video recording in full. A meaningful review of the hearing video alone would require most or all of the allotted session time.
22. Without workable inspection/review access, Plaintiff cannot identify "as precisely as possible" the record items to be corrected or annotated, which OP 77.13 treats as a prerequisite to completing the amendment request procedure.
23. On January 20, 2026, the Office of the Registrar rejected Plaintiff's initial amendment/annotation submission and instructed Plaintiff to resubmit, without providing substantive guidance on the format or specificity required. This rejection further delayed Plaintiff's ability to proceed through the OP 77.13 process.
24. On January 26, 2026, Plaintiff submitted a Step-2 written request under OP 77.13 to Dr. Erin Justyna, TTUHSC Associate Vice President/Provost, requesting amendment or annotation of the transcript notation "Administrative Dismissal Effective 01-11-2024." Defendants D'Agostino and McSween were copied on this request. As of the date of this Petition, no written decision or response has issued from Dr. Justyna or any other TTUHSC official regarding this Step-2 request.
25. On January 27, 2026, Plaintiff submitted a 22-item written punch list to the Office of the Registrar identifying specific education records that were referenced in or by other records produced during the January 5-8 inspection but that were not themselves produced for inspection. Plaintiff included TTUHSC production numbers for each item. As of the date of this Petition, Defendants have not produced the identified

records or responded to the punch list.

26. Plaintiff requested that TTUHSC process his request under OP 77.13 and Tex. Gov't Code § 559.004 (including issuance of the written response contemplated by OP 77.13 / § 559.004). Any later hearing step, if triggered by OP 77.13, is referenced only to explain why workable inspection/review is necessary. If the OP 77.13 process results in no change and Plaintiff submits a dispute statement, Plaintiff seeks only the ministerial maintenance of any dispute statement as part of the education record as OP 77.13 contemplates.
27. Plaintiff's Step-2 written amendment/annotation request (¶24) has been submitted and remains pending without response. No written decision--granting, denying, or otherwise disposing of the request--has issued through a workable procedure. Plaintiff does not seek to compel any hearing step in this Petition; Plaintiff seeks only that Defendants process the pending request to a written decision within a reasonable time.
28. Forty-five (45) days from Plaintiff's December 30, 2025 request was February 13, 2026. That deadline has passed. Defendants have not arranged or implemented a workable inspection/review format that would permit Plaintiff to complete the inspection/review step and proceed through the remaining OP 77.13 / § 559.004 steps within the 45-day window. On February 22, 2026, Plaintiff sent a follow-up letter to the Office of the Registrar documenting the expiration of the 45-day deadline and requesting that Defendants implement a workable procedure.
29. As of the date of this Petition, Defendants have not proposed any alternative arrangement--such as secure portal access, electronic copies, or any other format--to allow Plaintiff to complete the inspection/review and amendment/annotation process. The only format offered remains the escorted in-person sessions described in ¶16 under the conditions that prevented completion during January 5-8.

30. As of the date of this Petition, Defendants have not arranged or implemented a workable inspection/review format and a reasonable, workable schedule reasonably calculated to complete the OP 77.13 record-access and correction/annotation process within OP 77.13's time limits. The 45-day window has expired. Defendants have not produced the records identified in Plaintiff's January 27 punch list. Defendants have not issued a written response to Plaintiff's January 26 Step-2 amendment request. Defendants have not proposed any alternative inspection format. The record-procedure required by § 559.004 and OP 77.13 remains incomplete on all three fronts.

V. CLAIMS FOR PROSPECTIVE RELIEF (OFFICIAL-CAPACITY ONLY; NO DAMAGES)

COUNT 1 - Ultra Vires Injunctive Relief (Prospective Only)

31. Structure of Count 1. Count 1 is pleaded in four elements: (1) duty source--Tex. Gov't Code § 559.004 as implemented through OP 77.13; (2) who owes what--each Defendant's ministerial role in providing a workable inspection/review and written-response procedure; (3) breach-- the procedure as implemented is not workable within the policy's time-limit structure; and (4) prospective remedy--an order requiring a workable procedure without directing record content.
32. Tex. Gov't Code § 559.004 requires a state governmental body to establish a reasonable procedure under which an individual is entitled to have the body correct information about the individual that is incorrect, and the procedure may not unduly burden an individual using the procedure. The statute's mandatory "shall" and "may not" language imposes non-discretionary duties on the responsible officials. TTUHSC has published HSC OP 77.13 as its student education-records procedure implementing those duties for education records. This Court need not determine whether any information is inaccurate; only whether Defendants maintain and implement a reasonable, non-unduly

burdensome procedure for Plaintiff's request.

33. Plaintiff seeks only prospective relief compelling performance of ministerial, non-discretionary steps--i.e., a reasonable procedure that may not unduly burden an individual and that is workable in practice so inspection/review and the written-response step can be completed within OP 77.13's stated time limits. Plaintiff does not ask the Court to design TTUHSC's policies or to dictate discretionary operational details beyond requiring a workable, non-unduly burdensome opportunity and a reasonable schedule. Defendants may select any reasonable format, modality, and scheduling method that satisfies OP 77.13's stated time limits and § 559.004's "may not unduly burden" requirement; Plaintiff seeks only an order that the procedure be workable in practice and timely implemented, not an order dictating particular dates, times, or modalities. Plaintiff seeks no order directing the substantive outcome of any correction/annotation decision.

TTUHSC adopted HSC OP 77.13 as its published education-record access and amendment/annotation procedure. Defendants, as the officials responsible for implementing § 559.004's mandatory procedure requirements through OP 77.13 within their respective roles, have non-discretionary duties to:

- a. arrange an inspection and review opportunity that is workable and not unduly burdensome in the sense that it permits completion of the inspection/review step within OP 77.13's stated time limits, in a format and on a schedule reasonably calculated to allow completion, including through the University Registrar for transcript-related inspection/review logistics;
- b. if a student is uncertain where the requested education records are maintained and submits a written request for assistance under OP 77.13, provide the written EVPA assistance described by OP 77.13 identifying the appropriate custodial office(s) and how to direct amendment/annotation requests;
- c. accept and process amendment/annotation requests and complete the procedure through issuance of a written response within a reasonable time consistent with OP 77.13's stated time limits after a workable inspection/review opportunity; and

d. if the OP 77.13 process results in no change and the student submits a written dispute statement, maintain the dispute statement in the education record as contemplated by OP 77.13, without expanding any disclosure obligations beyond OP 77.13.

34. Section 559.004 requires a procedure that is reasonable and may not unduly burden an individual. A procedure that, as implemented, prevents completion of inspection/review in time to proceed through the written-response step is unreasonable and unduly burdensome on its face and as applied. The 45-day window expired on February 13, 2026. Defendants have had more than sixty days since Plaintiff's December 30, 2025 request and have not implemented a workable procedure.

35. Defendants act ultra vires to the extent they refuse to perform, or unreasonably impede, the non-discretionary duties alleged above, including by:

(1) limiting inspection/review access to the escorted-session format described in ¶16 under conditions--including mandatory laptop surrender for restroom breaks, a forfeiture threat, and prohibition of any documentation method other than handwritten notes--that prevented Plaintiff from completing review of approximately 1,600 records and a 14-hour hearing video within the four-day window;

(2) failing to produce records identified in Plaintiff's January 27 punch list that were referenced in or by other records produced during the January 5-8 inspection but not themselves produced;

(3) rejecting Plaintiff's initial amendment/annotation submission without substantive guidance and failing to issue a written decision on Plaintiff's January 26 Step-2 amendment request; and

(4) failing to implement and adhere to a reasonable, workable schedule reasonably calculated to allow completion within OP 77.13's stated time limits.

36. Plaintiff seeks only prospective relief requiring performance of ministerial steps and compliance with the established record-procedure. Plaintiff does not seek, and expressly disclaims, any adjudication of whether the contested record content is true or false and does not seek any order directing the substantive outcome of TTUHSC's internal decision on any requested correction or annotation.

37. Plaintiff has no adequate remedy at law for Defendants' ongoing failure to implement and timely operate the non-discretionary record-procedure steps pleaded above, and Plaintiff seeks no damages. Without prospective injunctive relief compelling timely procedure compliance, Plaintiff will remain unable to complete the inspection/review and written-response steps necessary to use the OP 77.13 / § 559.004 procedure.

COUNT 2 - Statutory Duty (Tex. Gov't Code § 559.004) (Alternative / Supporting Basis for Prospective Ultra Vires Relief)

38. In addition to and in support of Count 1, Plaintiff pleads § 559.004 as an independent statutory source of the non-discretionary duty to maintain and implement a reasonable, non-unduly burdensome correction/annotation procedure. Any order entered in this action should be limited to compelling performance of ministerial procedure steps and should not be construed as a determination of the correctness of any contested education-record item or the justification for any underlying decision referenced in the record.

39. Defendants' failure to provide and implement a workable, timely correction/annotation procedure for Plaintiff's December 30, 2025 request warrants prospective injunctive relief directing implementation of a reasonable procedure, including (if the OP 77.13 process results in no change and Plaintiff submits a dispute statement) maintenance of any dispute statement in the education record as contemplated by OP 77.13, without expanding any disclosure obligations beyond OP 77.13.

VI. PRAYER

40. Plaintiff prays that Defendants be cited to appear and answer and that, after notice and hearing, the Court grant prospective injunctive relief compelling implementation and timely operation of the reasonable, non-unduly burdensome procedure required by Tex. Gov't Code § 559.004, as implemented through TTUHSC's published OP 77.13 process, including orders requiring Defendants to perform the non-discretionary, ministerial procedural steps described in TTUHSC's published OP 77.13 process (as referenced in this Petition) and required by Tex. Gov't Code § 559.004, without directing the substantive outcome of any record-content dispute.

If temporary injunctive relief is sought or granted (temporary restraining order or temporary injunction), Plaintiff requests that any order comply with Tex. R. Civ. P. 683 and that the Court fix the amount of security required by Tex. R. Civ. P. 684.

Plaintiff requests that the Court order Defendants to:

- a. Provide Plaintiff a meaningful opportunity to inspect and review the responsive education records under OP 77.13 by a method of Defendants' choosing, so long as the method is not unduly burdensome; at minimum, the inspection/review opportunity shall include:
 - i. A written inspection schedule issued within seven (7) days of the Court's order (or such other deadline as the Court sets), with sufficient sessions and duration to permit completion of inspection/review of the responsive set within OP 77.13's stated time limits (or within a Court-set completion deadline);
 - ii. An organized presentation of the responsive set (electronically or in a single, paginated binder or equivalent) sufficient to allow Plaintiff to identify specific pages/items "as precisely as possible" for an amendment/annotation request;
 - iii. Permission for Plaintiff to take notes during inspection/review in a non-disruptive manner (handwritten or typed), and to record page/item identifiers (e.g., Bates/page numbers) necessary to prepare an OP 77.13 amendment/annotation request; and
 - iv. Reasonable continuity of access (i.e., sessions not repeatedly canceled or postponed without reasonable alternative dates) such that the inspection/review step can be completed;

- b. If Plaintiff is uncertain where the requested education records are maintained and submits a written request for assistance under OP 77.13, provide the written EVPA assistance described by OP 77.13 identifying the custodial office(s) maintaining the relevant education records and written instructions for directing amendment/annotation requests to the appropriate custodians;
- c. Accept, docket, and process Plaintiff's OP 77.13 amendment/annotation request(s) in accordance with the published procedure, and complete the procedure through issuance of the required written response within a reasonable time--and in any event within twenty-one (21) days after receipt of Plaintiff's amendment/annotation request(s) submitted following completion of inspection/review--without ordering any particular substantive amendment, correction, or annotation outcome;
- d. If and only if the OP 77.13 process results in no change and Plaintiff submits a written dispute statement pursuant to OP 77.13, maintain and associate the dispute statement with the contested portion of the education record and include it with any disclosure of the contested portion to the extent OP 77.13 itself requires, without expanding any disclosure obligations beyond OP 77.13;
- e. Provide Plaintiff, at or before the first inspection session, a simple written inventory of the responsive set sufficient to identify categories and approximate volume (e.g., a table of contents or folder list), solely to enable completion of inspection/review and preparation of an amendment/annotation request;
- f. Produce for inspection/review the records identified in Plaintiff's January 27, 2026 punch list that were referenced in or by other records produced during the January 5-8 inspection but were not themselves produced;
- g. File a short compliance notice with the Court within ten (10) days after the Court's order stating (i) the inspection method selected, (ii) the inspection schedule, and (iii) the name/title of the official responsible for implementing OP 77.13 logistics for Plaintiff's request;
- h. Provide that Defendants shall not deny, refuse, or deem untimely any OP 77.13 amendment/annotation request or follow-on step on the ground that any OP 77.13 time window elapsed where the inability to complete inspection/review or identify items "as precisely as possible" resulted from Defendants' inspection format, postponements, or other undue burdens; any internal time periods that would otherwise run against Plaintiff are tolled until completion of the Court-ordered inspection/review opportunity; and
- i. Preserve the responsive set and maintain it in the organized format used for inspection (including pagination/Bates identifiers) during the pendency of the OP 77.13 / § 559.004 procedure; any later-located

responsive items shall be logged and added to the inventory and responsive set in a way that allows Plaintiff to identify them with stable page/item identifiers.

Plaintiff requests that any relief granted be expressly limited to ministerial, procedure-only compliance with OP 77.13 and Tex. Gov't Code § 559.004 and entered without any finding regarding the truth, falsity, or correctness of any record content and without ordering any substantive change to any transcript or education record. Plaintiff further requests that any implementation mechanism ordered by the Court be administered in a manner that protects confidential student information (including through redaction, protective order, or in camera procedures as appropriate), solely as needed to implement the ministerial record-procedure compliance relief requested herein and without expanding the scope of the education records at issue.

Plaintiff respectfully requests an expedited hearing setting at the Court's earliest practical availability consistent with notice requirements, in order to allow the prospective procedural relief requested to operate within the time limits referenced in the published OP 77.13 process described in this Petition.

If the Court determines any pleading deficiency regarding jurisdiction or proper parties, Plaintiff requests leave to amend to cure any curable defect.

Respectfully submitted,

/s/ Kevin N. Bass
KEVIN N. BASS (pro se)

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Telephone: (512) 333-4092
Email: kbassphiladelphia@gmail.com

CERTIFICATE OF SERVICE

I certify that on March 2, 2026, a true and correct copy of this Fourth Amended Verified Original Petition was served in accordance with Texas Rule of Civil Procedure 21a upon:

Scott D. Smith
Assistant Attorney General
Office of the Attorney General of Texas
General Litigation Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
Telephone: (512) 917-3132
Email: scott.smith@oag.texas.gov
via the electronic filing manager.

/s/ Kevin N. Bass
Kevin N. Bass

VERIFICATION

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

My name is Kevin N. Bass. My date of birth is December 7, 1984. My address is [REDACTED]

I declare under penalty of perjury that the facts stated in this Petition are true and correct.

Executed in Lubbock County, Texas, on March 2, 2026.

/s/ Kevin N. Bass
Kevin N. Bass

Automated Certificate of eService

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Filing Description: Fourth Amended Verified Original Petition

Status as of 3/3/2026 8:23 AM CST

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