

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

KEVIN N. BASS,
Plaintiff,

v.

TEXAS TECH UNIVERSITY HEALTH
SCIENCES CENTER, et al.,
Defendants.

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Civil Action No. 5:25-cv-00244-H-BV

PLAINTIFF'S NOTICE OF ERRATUM

TO THE HONORABLE COURT:

Plaintiff Kevin N. Bass respectfully files this Notice of Erratum to correct an inaccurate characterization in the Proposed Second Amended Complaint (Dkt. No. 43-1), filed on March 31, 2026.

CORRECTION TO PARAGRAPH 74

Paragraph 74 of the Second Amended Complaint states:

"TTUHSC had prior notice that its disciplinary procedures exposed individual officials to personal liability: in *Stewart v. TTUHSC*, before the same presiding judge, TTUHSC settled a student's due process claims and its President signed an individual-capacity release."

This characterization is inaccurate. *Stewart v. TTUHSC*, No. 5:23-cv-00007-H (N.D. Tex. 2025), was a race-discrimination case brought under Title VI of the Civil Rights Act of 1964, 42 U.S.C. Section 1981, and the Equal Protection Clause — not a due process case. The sentence should read:

"TTUHSC had prior notice that its disciplinary procedures exposed individual officials to personal liability: in *Stewart v. TTUHSC*, No. 5:23-cv-00007-H (N.D. Tex. 2025), before the same presiding judge, TTUHSC settled a student's constitutional claims, and its President signed a release in her individual capacity that expressly covered due process claims."

The settlement agreement in Stewart, executed February 14-19, 2025, and approved by the Office of the Texas Attorney General, was signed by President Lori Rice-Spearman "on behalf of TTUHSC and in her individual capacity." The release in Paragraph 4 of that agreement expressly covers "deprivation or violation of rights to substantive or procedural due process." The corrected sentence accurately reflects both the nature of the lawsuit (constitutional claims based on race discrimination) and the scope of the release (which included due process claims among other categories).

Plaintiff regrets the error.

Respectfully submitted,

/s/ Kevin N. Bass

Kevin N. Bass, PhD, MS

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Telephone: 512-333-4092

Email: kbassphiladelphia@gmail.com

PRO SE PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on the 7th day of April, 2026, a true and correct copy of this Notice of Erratum was filed with the Clerk of Court and served on all counsel of record via the Court's CM/ECF system.

/s/ Kevin N. Bass

Kevin N. Bass, PhD, MS

Plaintiff, Pro Se