

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

RAJIN PATEL,

Plaintiff,

v.

TEXAS TECH UNIVERSITY; DUANE JONES, individually and in his official capacity as adjunct professor; WILLIAM PASEWARK, individually and in his official capacity as TTU Rawls College of Business Associate Dean of Graduate Programs and Research; ROBERT RICKETTS, individually and in his official capacity as Area Coordinator in Accounting; and BRITTANY TODD, individually and in her official capacity as Associate Director of the Office of Student Conduct;

Defendants.

Civil Action No.: 5:17-CV-174-C

(JURY REQUESTED)

PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

TO THE HONORABLE JUDGE SAMUEL RAY CUMMINGS:

Plaintiff Rajin Patel ("Plaintiff" or "Mr. Patel"), file this Opposition (the "Opposition") to Defendants' Motion to Dismiss (the "Motion"), and would respectfully show as follows:

As explained in detail in the brief in support of this Opposition, which is filed contemporaneously herewith, the Motion should be denied in its entirety because Plaintiff's claims are not barred by any immunities and they are well-pleaded in the Complaint.

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PRAYER

Plaintiff Rajin Patel respectfully requests that this Court deny Defendant's Motion to Dismiss in its entirety.

DATED this 13th day of September 2017.

THE BACH LAW GROUP, PLLC

By /s/ Jason J. Bach
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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of September, 2017, a true and correct copy of the foregoing pleading was served upon each party to this action via the Court's electronic case filing system, as follows:

Rola Daaboul, Esq.
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Attorney for Defendants

By: /s/ Jason J. Bach
Jason J. Bach