

Amendment and 1st Amendment rights were in fact violated by the Defendants abuse of power in such a way that Plaintiff was discriminated and retaliated against as a TTUHSC School of Nursing (SON) academic graduate and doctorate student. Plaintiff continued to be discriminated and retaliated against after mutually agreeing and deciding with the Defendants as her employer, that the Plaintiff should resign in her role as a nursing instructor from TTUHSC SON, which was executed by Defendant in this case, Dr. Evans. Interestingly, the resignation took place approximately 43 days before receiving an unjust, retaliatory dismissal letter from the Defendants removing Plaintiff as a graduate and doctorate student from her TTUHSC SON academic programs. Plaintiff is in correct jurisdiction, The United States Northern District of Texas Lubbock Division because Plaintiff constitutional rights were violated in this District Court and has the authority to grant relief for violations. Plaintiff seeks leave to amend the original Complaint to the proposed Amended Complaint. Plaintiff remains focused on obtaining justice for the Defendants violations of Plaintiff's constitutional rights, seeks equitable monetary relief in this matter from the damages the Defendants caused. A permanent injunction is also being requested, which will prohibit Defendants from ever discriminating and retaliating against Plaintiff or any other individual.

For all these reasons, and those stated in the attached memorandum in support, Plaintiff respectfully request that the Court grant Plaintiffs leave to file the attached Amended Complaint. Also attached is a proposed order.

Respectfully submitted,

DATED this 27th day of August 2021.

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PLAINTIFF, PRO SE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served electronically through the Court's Electronic Case File Notification on this 27th day of August 2021. to:

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