

United States District Court

Northern District of Texas

Lubbock Division

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FILED - USDC - NDTX - LU

Alan Lucas

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5-25CV-251-H

Versus

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Civil Action:

Texas Tech University

*

Health Sciences Center

*

Comes now, Alan Lucas, plaintiff in the above-styled cause, pursuant to 28 U.S.C. § 1331, and would respectfully show the following:

I.

Parties

Alan Lucas, plaintiff

8602 Peach Avenue

Lubbock, Texas 79404-7777

Texas Tech University Health

Sciences Center, defendant

P.O. Box 989728

West Sacramento, California 95798-9728

II.

Background

Texas Tech University Health Sciences Center, (TTUHSC), defendant, is, and has been, the sole

healthcare provider for the plaintiff in this cause and maintains all of his medical records with personal identity information.

III.

Facts Of The Case

Between September 17, 2024, and September 29, 2024, TTHSC, through negligence, had a cybersecurity event by unknowns which resulted in the removal and disclosure of plaintiff's name, date of birth, social security number, address, driver's license number, government issued identification number, health insurance information, and medical information, including medical records / numbers, diagnosis and treatment information, for the purpose of identity theft / fraud by unknown others.

In a letter dated January 24, 2025, TTUHSC informed the plaintiff of these facts. Several times plaintiff has reached out to the defendant to resolve the theft of his identity resulting from defendant's negligence to no avail.

IV.

Relief

Plaintiff seeks monetary damages in the amount of one billion dollars and any other equitable relief the court may grant plus all court costs

in connection with this lawsuit.

V.

Jury Demand

Plaintiff demands a trial by jury on all issues herein pursuant to F.R.C.P. rule 38(b).

VI.

Declaration

Plaintiff declares, under penalty of perjury, that all facts stated herein is true and correct to the best of his knowledge.

Signed this 30th day of October, 2025.

alan lucas

Alan Lucas, 644056

8602 Peach Avenue

Lubbock, Texas 79404-7777

October 30, 2025

United States District Court Clerk
Northern District of Texas
Subrock, Division
1305 Texas Avenue, Room 209
Subrock, Texas 79401-4091

Dear Clerk,

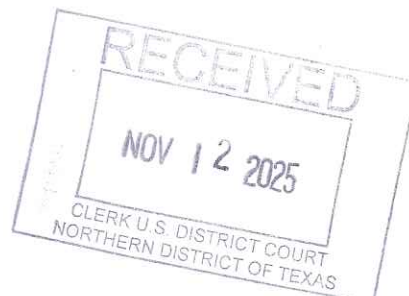
Please file the enclosed and bring the
matter to the attention of the court.

Cordially,

Alan Lucas

8602 Peach Avenue

Subrock, Texas 79404-7777

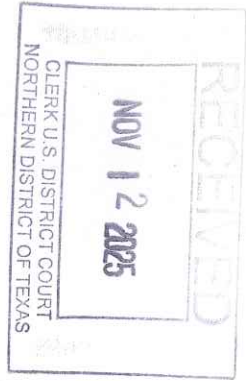


Alan Suarez, 6440516
8003 Peach Avenue
Lubbock, Texas 79404-7777

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United States District Court
Northern District of Texas
Lubbock Division
1805 Texas Avenue, Room 209
Lubbock, Texas 79401-4091
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