

Date	Filing	Request	Defendant Response
May 26, 2022	CPS RMG verbal inquiry	Requested CPS report.	No CPS report produced.
February 29, 2023	Libel suit naming John/Jane Doe 1-6 aliases	Sole purpose of obtaining student identities.	No student identities produced.
March 21, 2023	SUBPOENA DUCES TECUM	Sole purpose of obtaining student identities.	District releases unredacted copies of the student identities and statements, without producing FERPA compliance evidence.
June 2023	CPS RMG online submission Reference # NC230628XNB	Requested CPS Report ID 1a410f98.	Advised CPS RMG Report ID's do not contain alphabetic characters. No CPS report produced.
July 28, 2023	Amended libel petition naming the six students and parents/guardians.	Sole purpose of pursuing evidence of who was the first accuser vs. the five witnesses.	No student accuser identified.
Jan 23, 2024	Plaintiff's Interrogatory No. 9	Asked for all facts reviewed by the Legal Review Committee (LRC) regarding alleged misconduct, including CPS report verification.	Referred to internal documents (DISD 2290–2317, 2337–38) but no CPS report produced.
Jan 24, 2024	Plaintiff's Requests for Admissions (RFA 1 & 3)	Asked if Dallas ISD aware of compliance requirements regarding the Texas Education Code.	Affirmative response.
Jan 24, 2024	Plaintiff's Requests for Admissions (RFA 43 & 45)	Asked if Dallas ISD failed to report allegations to CPS and law enforcement.	(RFA 43) Denied (RFA 45) Claimed CPS report was made. Admitted no law enforcement report.
Jan 24, 2024	Plaintiff's Requests for Admissions (RFA 50)	Admit Dallas ISD did not violate standards of conduct for	Request denied.

		educators ethical treatment of students.	
Jan 24, 2024	Plaintiff's Request for Production No. 5 & 9	Requested all CPS communications, including the CPS report identified in the Critical Incident Report.	Produced only internal record of an 'April 8, 2022 verbal or online CPS report reference (DISD 2275). No CPS report produced.
April 4, 2024	CPS RMG verbal inquiry	Requested any CPS report involving accused Plaintiff.	No CPS report produced. Advised to file subpoena.
Aug 22, 2024	Texas DFPS Subpoena Response (BRAVO 3883)	Court-ordered inspection and release of CPS records.	DFPS confirmed CPS Report ID '1a410f98' "does not exist".
June 10, 2024	Libel nonsuit	Dismissal	Under the auspices of FERPA, Dallas ISD and defendants refuse to identify the first accuser so all six have to be treated as witnesses.
Sept 9, 2024	Defendant's Amended Response to RFP No. 9	Reiterated request for CPS records.	Produced email (DISD 3372–3373) referencing alleged CPS report but still no CPS report produced.
September 10, 2024	Mr. Ceballos Deposition	Requested CPS Report	No CPS report produced.
September 13, 2024	Mr. Minor's Deposition	Requested CPS Report	Did not complete CPS report.
September 24, 2024	Ms. Ward's Deposition	Requested CPS Report	Did not complete CPS report.
October 11, 2024	Mr. Abel's Deposition	Requested CPS Report	No CPS report produced.
November 19, 2024	Motion For Summary Judgement App. 524–525		April 8, 2022 Email from Roger Ceballos to Tameca Ward, forwarding alleged CPS report information. No CPS report produced.

February 18, 2025	TEA Complaint	Investigation of TFC 261-101, 261-104, 261-109 compliance by Minor, Ceballos, and Ward.	Denied
May 22, 2025	TEA complaint forwarded to Dallas ISD superintendent, police, and Board of Trustees.	Investigation of TFC 261-101, 261-104, 261-109 compliance by Minor, Ceballos, and Ward.	Denied
July 10, 2025	Request for reopening	Investigation continue	Denied
July 23, 2025	TEA Commissioner	Reconsideration of request for investigation	No response
July 30, 2025	MEMORANDUM OPINION AND ORDER		Verified no CPS report produced.