**No. 05-24-00813-CV**

---

**IN THE FIFTH COURT OF APPEALS**
**DALLAS DIVISION**

---

**TEXAS PUBLIC POLICY FOUNDATION,**
*Plaintiff-Appellant*,

**v.**

**HIGHLAND PARK INDEPENDENT SCHOOL DISTRICT,**
*Defendant-Appellee*.

---

On Appeal from the 14th Judicial District Court
of Dallas County, Texas

---

# APPELLANT'S REPLY BRIEF

---

ROBERT HENNEKE
TX Bar No. 24046058
rhenneke@texaspolicy.com
CHANCE WELDON
TX Bar No. 24076767
cweldon@texaspolicy.com
CHRISTIAN TOWNSEND
TX Bar No. 24127538
ctownsend@texaspolicy.com
TEXAS PUBLIC POLICY FOUNDATION
901 Congress Avenue
Austin, Texas 78701
Telephone:(512) 472-2700

## IDENTITY OF PARTIES AND COUNSEL

| | |
|---|---|
| **Plaintiff/Appellant:** | Texas Public Policy Foundation |
| **Appellate and Trial Counsel for Plaintiff/Appellant:** | Christian Townsend<br>ctownsend@texaspolicy.com<br>Robert Henneke<br>rhenneke@texaspolicy.com<br>Chance Weldon<br>cweldon@texaspolicy.com<br>Texas Public Policy Foundation<br>901 Congress Avenue<br>Austin, Texas 78701<br>Telephone: (512) 472-2700<br>Facsimile: (512) 472-2728 |
| **Defendant/Appellee:** | Highland Park Independent School District |
| **Appellate and Trial Counsel for Defendant/Appellee:** | Meredith Prykryl Walker<br>mwalker@wabsa.com<br>Crystal Hernandez<br>chernandez@wabsa.com<br>Walsh Gallegos Kyle Robinson & Roalson, P.C.<br>105 Decker Court, Suite 700<br>Irving, Texas 75062<br>Telephone: (214) 574-8800<br>Facsimile: (214) 574-8800 |

## TABLE OF CONTENTS

## INDEX OF AUTHORITIES

***Cases:*** ***Page(s):***

***Statutes & Rules:***

## INTRODUCTION

The basic facts of this case are not in dispute. Prior to 2021, reports of bad actors at Highland Park Independent School District's (HPISD) Seay Tennis Center led HPISD to investigate employees' handling of the Tennis Center's financial operations. HPISD had an accounting firm, Whitley Penn complete an investigation to produce a financial report. After the investigation and the completion of that report, and in response to several emails, Michael White, HPISD's Assistant Superintendent for Business Service, told the public that HPISD had conducted an investigation and, based on that investigation, assured the public that there is "no malfeasance occurring" and that "no funds are being misdirected or mismanaged." 3.RR3. When the public sought to see that report and verify whether HPISD was telling the truth, HPISD said no—claiming privilege.

Appellant argues that the District Court made several legal errors in evaluating Plaintiff's claims of waiver and privilege. Additionally, Appellant has demonstrated a pattern of erroneous and hostile evidentiary rulings made by the District Court at the trial which impeded the District Court's ability to properly address Plaintiff's claims.

HPISD, in response, largely ignores the caselaw and the record below cited by Appellant. Instead, HPISD argues that Plaintiff failed to preserve *any* error at trial, that Mr. White didn't and couldn't reveal *any* portions of the Whitley Penn Report, and that the public is not entitled

to *any* portion of the Whitley Penn Report. But the caselaw, the record below, and the text of the Texas Public Information Act say otherwise.

HPISD's brief concludes by arguing that the public "is free to interview the same individuals Whitley Penn spoke with and conduct its own investigation." Appellee's Br. at 26–27. But if the public can gain this information on its own why does HPISD seek to actively hide it from the taxpayers that funded the gathering of the information in the first place? The Texas Public Information Act says that these sorts of core, factual documents should be brought to light. HPISD's attempts to circumvent that statutory mandate should not be permitted.

## ARGUMENT

### I. Appellant Preserved the District Court's Error at Trial.

At the outset, HPISD claims that Plaintiff did not "preserve any error at trial." Appellee Br. at 17. HPISD argues that because Plaintiff did not utter the words "offer of proof," that any error made by the District Court was not preserved. But this argument ignores the text of the Texas Rules of Evidence, Texas case law, and the actions of the District Court in this case.

First, the plain text of Rule 103 of the Texas Rules of Evidence indicates that preserving error is not a "magic words" test. The rule states, "[a] party may claim error in a ruling to admit or exclude evidence only if the error affects a substantial right of the party and . . . if the ruling excludes evidence, a party informs the court of its substance by an

offer of proof, unless the substance was apparent from the context." Tex. R. Evid. 103. HPISD does not focus on the first part of the test—that the rulings of the District Court affected a substantial right of Plaintiff. Rather, HPISD claims that failing to make a formal offer of proof or filing a bill of exception renders Plaintiff's objections waived.

But all that courts have required to satisfy Rule 103(a) is that the party objecting to the Court's exclusion of evidence "include a reasonably specific summary of the evidence offered" and "state the relevance of the evidence unless the relevance is apparent so that the court can determine whether the evidence is relevant and admissible." *Baxter v. State*, No. 14-20-00716-CR, 2022 Tex. App. LEXIS 4622, *21 (Tex. App.—Houston July 7, 2022).

Here the transcript clearly reflects that Plaintiff's counsel repeatedly attempted to introduce evidence about the context surrounding the email sent by Michael White to the public. 2.RR. 22–27. Plaintiff's counsel explained that the evidence would show that Mr. White's previous conversations were about the Whitley Penn Report. 2.RR.24. After the District Court prevented any evidence from being introduced, Plaintiff's counsel argued that the evidence needed to be admitted because "context matters" for determining whether privilege was waived. 2.RR.25–26. The Court's response bears full quotation.

> The Court: I'm unaccustomed to lawyers who argue with me after I've made a ruling. I have made a ruling and

> I have made it lucid. The issue that you've raised is waiver. The document that you say establishes waiver is Plaintiff's Exhibit 8 which is in evidence. I have instructed you that you will restrict your examination to this. I do not need context, I do not need background. This document either -- Shh. Be still, please, in the back, ladies. Thank you very much. -- you will either establish that the District waived its privilege via this document or not, and that's it.

2.RR.26. The District Court was clear that it had made its decision to exclude evidence, that it had heard Plaintiffs objections to that ruling, and that it was maintaining its decision. Indeed, the Court had threatened earlier that if Plaintiff's counsel continued to ask questions outside of the document, the District Court would excuse the witness. 2.RR.24.

This satisfies the requirements of Tex. R. Evid. R. 103 and satisfies any concerns HPISD presents with this Court's ability to determine whether the District Court's rulings contained reversible harm. Appellee's Br. at 18. This Court is well-placed to determine whether context matters for determining the meaning of words. The questions of whether Plaintiff should have been allowed to ask Mr. White what was discussed in previous conversations with the member of the public, or whether the information in his email was drawn from the Whitley Penn Report, can easily be determined by this Court. Plaintiff has preserved objections to the District Court's evidentiary ruling.

## II. Courts Can and Must Look Beyond the "Four Corners" of a Statement When Determining Waiver of Privilege.

As discussed above, the District Court was clear that Plaintiff was limited to discussing the "four corners" of the Whitley Penn Report. But it was this error—whether context matters in evaluating a claim that privilege was waived—that both the District Court and HPISD got wrong in their analysis of Mr. White's email. Both the District Court below and HPISD argue that this court should not "expand the [Mr. White] email beyond its four corners." Appellee's Br. at 14. But that is not how courts read words, particularly in the context of determining whether privilege has been waived.

Courts do this all the time when they read statutes. "We consider the words in context, not in isolation." *Tex. Dep't of Pub. Safety v. Nail*, 305 S.W.3d 673, 679 (Tex. App.—Austin, 2010). "When construing a statute, the courts must read words according to their ordinary meaning unless a contrary intention is apparent from the context." *Taylor v. Firemen's & Policemen's Civil Service Com.*, 616 S.W.2d 187, 189 (1981).

And this principle is true when reading words in the context of determining waiver of attorney-client privilege. In *In re Hicks*, the court evaluated whether a contract releasing "the full contents of any file(s)" included litigation files containing privileged information. 252 S.W.3d 790, 795 (Tex. App. —Houston, 2008). To determine the meaning of the release clause, the court looked at the context of the words within the

contract to determine whether or not a release clause was referring to privileged material. *Id*. at 796. The court looked at context, including other documents included in the record, to determine that the words in question were not waiving privilege. *Id*.

Indeed, HPISD themselves attempt to bring in context in order to determine words within Mr. White's email. To define Mr. White's use of "expert assistance" HPISD cites the testimony of Attorney Bryan Neal to clarify the meaning of the term. Appellee's Br. at 16. While HPISD did not introduce this affidavit in front of the trial court, it is worth noting that HPISD understands that introducing testimony to explain what words mean is vital in understanding the plain meaning of the words used. To the extent that HPISD now attempts to bring in context to define terms, it only highlights the error made by the District Court in refusing to allow in testimony from outside the email to understand whether Mr. White was waiving any privilege attached to the Whitley Penn Report. This error requires reversal and remand back to the District Court.

## III. Michael White Waived Privilege in His Communications with the Public.

The District Court's error in refusing to allow testimony from outside the "four corners" of Mr. White's emails is sufficient error to reverse the lower court's judgment and remand for additional testimony. But this Court can and should go further, correcting the legal and factual

errors made by the court below to give guidance when it evaluates the issue of waiver.

### A. Mr. White Could Waive Privilege over the Whitley Penn Report.

*First,* as addressed in Appellant's Brief, the District Court mistakenly held that only HPISD's Board of Trustees could waive privilege, and then only by a majority vote. App. Br. at 16 (citing CR.854). But Texas courts have repeatedly held that the members of the board of trustees are not the only ones that can waive privilege on behalf of a school district. App. Br. at 17 (citing cases). And HPISD does not cite a single Texas case that requires a majority vote by the Board of Trustees to waive privilege.

HPISD responds by arguing that since the Board of Trustees may sue and be sued that "it follows that only the HPISD Board of Trustees has the authority to waive the attorney-client privilege." Appellee's Br. at 12 (citing Tex. Educ. Code at § 11.151(a)). But just because the Board as a whole can sue and be sued, does not mean that privileged information shared with the Board can only be waived by the Board. Nor does it have to act through an official vote. *Tex. Tech Univ. Health Sciences Ctr.—El Paso v. Niehay*, 641 S.W.3d 761, 790 (Tex. App.—El Paso 2022), *rev'd on other grounds*, 671 S.W.3d 929 (Tex. 2023). Instead, courts have looked at whether the employee waiving the privilege is a

"management level employee" with "independent authority" to waive the privilege. *Id.*

HPISD's cases are not to the contrary. HPISD cites *Commodity Futures Trading Comm'n v. Weintraub* for the proposition that "the power to waive the corporate attorney-client privilege rests with the corporation's management." Appellee's Br. at 12, fn. 11 (citing 471 U.S. 343, 349 (1985)). But HPISD's quotation leaves out the end of the sentence. The full sentence reads, "[T]he power to waive the corporate attorney-client privilege rests with the corporation's management *and is normally exercised by its officers and directors*." *Weintraub*, 471 U.S. at 349.

The other two cases cited by HPISD do not support its argument either. While *In re Halter* does quote only the first half of *Weintraub*, discussing how privilege belongs to the corporation, the question in that case was whether attorney-client privilege existed—the court held it did not. No. 05-98-01164-CV, 1999 Tex. App. LEXIS 6478, at *3 (Tex. App.—Dallas Aug. 27, 1999, orig. proceeding). It did not address whether privilege was waived or who could waive the organization's privilege.

Indeed, the best case HPISD cites is an unpublished California district court opinion where an individual board member published a memo revealing privileged information. *Galli v. Pittsburg Unified Sch. Dist.*, No. C 09–3775 JSW, 2010 U.S. Dist. LEXIS 119618 (N.D. Cal. Oct. 26, 2010). There, the court held that the individual board member did

not have the power to waive privilege on behalf of the board. *Id*. at *10. But the court in that case acknowledged that the board member was "acting contrary to his fiduciary duties as a Board member." *Id*. at *11.

But here, Mr. White exercised sole authority over the Seay Tennis Center. 3.RR.3. His communications about the report were made on behalf of HPISD with the full knowledge of Dr. Tom Trigg, HPISD's Superintendent, as well as HPISD's attorney. 3.RR.3. And HPISD has never distanced itself from his statements. Mr. White is precisely the type of "management level employee" with "independent authority" to waive privileged information he received from HPISD's attorneys. And unlike in *Galli*, Mr. White was not trying to subvert HPISD, but rather was revealing information that HPISD wanted to reveal to the public.

Indeed, HPISD does not even attempt to show how Mr. White is not an officer or director of HPISD. Rather HPISD argues that if Mr. White was able to waive privilege, then "every communication by a District employee" could waive privilege. But, as addressed above, Mr. White is not just an employee. Nor is he a rogue board member attempting to subvert the school district. Rather, Mr. White is exactly the type of official who would have access to privileged information and who would be able and expected to speak on behalf of HPISD to the public about the Seay Tennis Center.

And if there were any questions remaining about his ability to waive privilege, the fact that Mr. White was responding on behalf of Dr.

Tom Trigg, HPISD's Superintendent, who never attempted to contradict or pull back Mr. White's statements, is sufficient to permit Mr. White's email to waive privilege. The District Court's holding that only the Board Trustees, acting by majority vote, could waive privilege should be reversed.

### B. Mr. White Knew the Contents of the Whitley Penn Report.

HPISD's brief states that "Mr. White did not know and still does not know the contents of the WP Report." Appellee's Br. at 13. But the record does not support this statement. Mr. White stated at trial that he was aware of the Whitley Penn Report. 2.RR.27. He testified that he knew the conclusions drawn from the report. 2.RR.27. To the extent there is any ambiguity, it is because the District Court refused to allow Mr. White to elaborate on his answers. When Plaintiff's counsel asked if his statement that "there is no mismanagement occurring" was drawn from conversations about the Whitley Penn report the District Court judge barred questions saying that answering that question would violate his order on privilege. 2.RR.27. HPISD's attempts to misconstrue the record are rebutted by Mr. White's clear testimony at trial.

### C. Mr. White's Email Waived Privilege On Whitley Penn Report.

What HPISD spends most of its briefing emphasizing the tense used by Mr. White in his email to say that Mr. White was only talking

about the current management of the Seay Tennis Center. HPISD argues that there is no connection between Mr. White's reference to the Whitley Penn Report and his subsequent statement that there is "no mismanagement" and "no malfeasance occurring" at the Center, and that "no funds are being misdirected or mismanaged." 3.RR.3.

But this misses the point. Mr. White's email was in response to an inquiry from a concerned citizen about the contents of the Report. 3.RR.3. Mr. White testified that the "investigation" he was referring to in his email was the Whitley Penn Report. 2.RR.27. He then goes on to reassure a member of the public that nothing is going wrong at HPISD. To disconnect the discussion of the Whitley Penn Report and Mr. White's assurances to the public stretches belief. If someone says, "I read the report and there is no corruption and there are no issues occurring," the average reasonable person would assume the conclusions stated come from the report.

Indeed, even the District Court below believed that Mr. White's conclusions came from the Whitley Penn report. When Plaintiff's counsel asked Mr. White whether his conclusion that "there is no mismanagement occurring" was drawn from the Whitley Penn report, the court intervened instructing the witness not to answer because doing so "violates privilege." 2.RR.27. HPISD cannot have its cake and eat it too. Either his statements were unconnected to the Whitley Penn Report in which case the District Court erred in instructing the witness not to

answer, or his conclusion did come from the Whitley Penn Report and his email was revealing privileged information. These errors, along with the legal errors discussed above, require correction from this Court.

## IV. The District Court's Legal Conclusions Determining Privilege Require Reversal.

Finally, with regards to the attorney-client privilege attached to the Whitley Penn Report, HPISD's brief misunderstands both what the District Court held and what Appellant challenges on appeal. To be sure, Appellant believes that the Whitley Penn Report is not privileged and should be subject to disclosure. But the District Court made several legal errors that require this Court to intervene to reverse and remand this case back to the trial court. Only then can the District Court truly determine whether privilege attaches to the Whitley Penn Report.

### A. HPISD Misstates the Record Below.

HPISD repeatedly claims that the Whitley Penn Report was akin to "legal strategy, assessments, and conclusions." Appellee's Br. at 21, 27. But that misrepresents the record below. The Whitley Penn Report involved lawyers ordering non-lawyers to conduct a factual investigation into the financial aspects of what was going wrong at the Seay Center. CR.797. Based on that investigation, HPISD used those facts gathered to make personnel decisions. CR.796. Indeed, HPISD states that the information within the Whitley Penn Report is information that Plaintiff could get on its own. Anyone is "free to interview the same individuals

Whitley Penn spoke with." Appellee's Br. at 26. The Report is not a lawyer's conclusion but an investigation by accountants. CR.851.

This matters because, as discussed below, courts have held that "[e]ven in the shadow of impending litigation, purely factual investigations or judgments on business matters are not privileged, even in cases where lawyers are hired to make them." *Adelman v. Peter*, No. L-08-6, 2009 U.S. Dist. LEXIS 110652 at *11 (S.D. Tex. Nov. 30, 2009). HPISD's attempt to convert the Whitley Penn Report into the conclusions of an attorney is not supported by the record.

### B. The District Court Used the Wrong Standard in Determining Privilege.

It was this confusion—whether the Whitley Penn Report was itself legal advice—that led the Court to use the wrong standard in determining whether the Whitley Penn Report was subject to attorney-client privilege. Below, the District Court held that because Whitley Penn was hired by an attorney, it was a lawyer's representative and therefore the Report created was necessarily subject to attorney-client privilege. HPISD defends that decision citing an affidavit from its attorney saying that Whitley Penn was hired to assist in its rendering of legal advice. But this is erroneous for two reasons.

*First*, the information cited by HPISD was not properly before the District Court when it made its determination of privilege. The only document HPISD submitted to the District Court for in camera review

was the Whitley Penn Report itself. CR.834. The District Court did not ask for briefing or for additional facts to assist it in determining whether the Whitley Penn Report was privilege. *Id*. And at trial, HPISD never introduced the affidavit it now cites in its brief. Indeed, HPISD did not introduce any evidence at trial. The District Court would not allow it. 2.RR.7. And unlike Plaintiff, HPISD did not even attempt to introduce evidence. 2.RR.28–29. This is crucial because the burden of proof for establishing privilege lies with HPISD. *Jordan v. Court of Appeals for Fourth Supreme Judicial Dist.*, 701 S.W.2d 644, 649 (Tex. 1985).

*Second*, HPISD and District Court applied the wrong standard when evaluating whether privilege attached to the Whitley Penn Report. Citing *Harlandale Indep. Sch. Dist. v. Cornyn*, HPISD claimed that the mere statement by an attorney that he was hiring an accounting firm to assist in providing legal advice was sufficient for privilege to attach. 25 S.W.3d 328, 334 (Tex. App.—Austin July 27, 2000, pet. denied); Appellees Br. at 22–23.

But the District Court should have looked beyond simply who hired Whitley Penn to determine whether the information was a "purely factual investigation" where privilege would not attach. *Adelman v. Peter*, No. L-08-6, 2009 U.S. Dist. LEXIS 110652 at *11 (S.D. Tex. Nov. 30, 2009). Indeed, that is what the record and the District Court's own findings suggest. In this case, lawyers ordered non-lawyers to conduct a factual investigation into the financial aspects of what was going wrong

at the Seay Center. CR.797. The District Court found that Whitley Penn was brought in to create a report analyzing "internal controls and other accounting procedures and issues . . . ." CR.851. Based on that report, HPISD used those facts gathered to make certain personnel decisions. CR.796.

Indeed, the only legal advice HPISD has ever claimed to be seeking related to personnel decisions. CR.805. But the Court in *Seibu Corp. v. KPMG LLP*, held that internal investigations in order to make personnel decisions are not subject to attorney-client privilege. No. 3-00-CV-1639-X, 2002 U.S. Dist. LEXIS 906 at *11–*14 (N.D. Tex. Jan. 18, 2002).

It was this legal error—that the District Court applied the wrong standard in determining whether attorney-client privilege existed—that requires this Court to intervene and remedy.

### C. The District Court Erred in Refusing to Consider Partial Disclosure.

Additionally, the District Court erred in refusing to consider partial disclosure of the purely factual information within the Whitley Penn Report. The text of the Texas Public Information Act contemplates that existence of attorney-client privilege to some portion of a document does not justify withholding of the entire document when the information rises to the level of core public information. Tex. Gov't Code § 552.022(a)(16) (defining information in an attorney's fees bill as core public information

even if the bill also contains non-discoverable information covered by the attorney-client privilege).

HPISD counters that the attorneys' bills are simply different than the Whitley Penn report. Appellee's Br. at 26. But HPISD admits that at least some portions of the Report are purely factual information that Appellant could acquire itself. *Id.* And the record reflects that part of the Whitley Penn Report included merely "review[ing] documentation concerning the conduct of certain employees with respect to financial matters related to the Seay Tennis Center." RR.796.

The District Court refused to consider whether parts of the Whitley Penn Report were purely factual information that is subject to disclosure under the Texas Public Information Act. That error should be reversed and this Court should remand to allow the District Court to determine which portions of the Whitley Penn Report should be subject to disclosure.

## CONCLUSION

"The people, in delegating authority, do not give their public servants the right to decide what is good for the people to know and what is not good for them to know." 2022 Public Information Handbook at 2 (citations omitted). This principle lies at the heart of the Texas Public Information Act. Yet this is precisely what HPISD asks this Court to do when it claims that the entirety of the Whitley Penn Report is subject to attorney-client privilege and Mr. White did not reveal any portion of the

Whitley Penn Report. The record and the case law do not support the District Court's decision and this Court should reverse and remand so that Appellant has a chance to gain access to public information.

Respectfully submitted,

*/s/Christian Townsend*
ROBERT HENNEKE
Texas Bar No. 24046058
rhenneke@texaspolicy.com
CHANCE WELDON
Texas Bar No. 24076767
cweldon@texaspolicy.com
CHRISTIAN TOWNSEND
Texas Bar No. 24127538
ctownsend@texaspolicy.com
TEXAS PUBLIC POLICY FOUNDATION
901 Congress Avenue
Austin, Texas 78701
Telephone:(512) 472-2700
Facsimile: (512) 472-2728
*Attorneys for Plaintiff/Appellant*

## CERTIFICATE OF COMPLIANCE

Pursuant to TEX. R. APP. P. 9.4, I hereby certify that this brief contains 3,888 words. This is a computer-generated document created in Microsoft Word, using 14-point typeface for all text, except for footnotes which are in 12-point typeface. In making this certificate of compliance, I am relying on the word count provided by the software used to prepare the document.

*/s/Christian Townsend*
CHRISTIAN TOWNSEND

## CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2024, a true and correct copy of the foregoing document was filed electronically and all counsel of record indicated below have been served via electronic service.

Meredith Prykryl Walker
mwalker@wabsa.com
Crystal Hernandez
chernandez@wabsa.com
Walsh Gallegos Kyle
Robinson & Roalson, PC
105 Decker Court, Suite 700
Irving, Texas 75062

*/s/Christian Townsend*
CHRISTIAN TOWNSEND

# Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Christian Townsend on behalf of Christian Townsend
Bar No. 24127538
ctownsend@texaspolicy.com
Envelope ID: 93266328
Filing Code Description: Other Brief
Filing Description: Appellant's Reply Brief
Status as of 10/17/2024 11:00 AM CST

Associated Case Party: Texas Public Policy Foundation

| Name | BarNumber | Email | TimestampSubmitted | Status |
|---|---|---|---|---|
| Yvonne Simental | | ysimental@texaspolicy.com | 10/17/2024 10:46:43 AM | SENT |
| Robert Henneke | | rhenneke@texaspolicy.com | 10/17/2024 10:46:43 AM | SENT |
| Christian Townsend | | ctownsend@texaspolicy.com | 10/17/2024 10:46:43 AM | SENT |
| Chance DWeldon | | cweldon@texaspolicy.com | 10/17/2024 10:46:43 AM | SENT |

Case Contacts

| Name | BarNumber | Email | TimestampSubmitted | Status |
|---|---|---|---|---|
| Meredith Walker | | mwalker@wabsa.com | 10/17/2024 10:46:43 AM | SENT |
| Anjela Young | | ayoung@wabsa.com | 10/17/2024 10:46:43 AM | SENT |
| Crystal Hernandez | | chernandez@wabsa.com | 10/17/2024 10:46:43 AM | SENT |
| Jerome Patterson | | jpatterson@wabsa.com | 10/17/2024 10:46:43 AM | SENT |
| Cynthia Osborne | | cosborne@wabsa.com | 10/17/2024 10:46:43 AM | SENT |

Associated Case Party: Highland Park Independent School District

| Name | BarNumber | Email | TimestampSubmitted | Status |
|---|---|---|---|---|
| Meredith Walker | 24056487 | mwalker@wabsa.com | 10/17/2024 10:46:43 AM | SENT |
| Crystal Hernandez | | chernandez@wabsa.com | 10/17/2024 10:46:43 AM | SENT |