#### CAUSE NO. 471-08453-2025

DOE FAMILIES I-XII,	§	IN THE DISTRICT COURT
	§	
Plaintiffs,	§	
	§	
V.	§	471st JUDICIAL DISTRICT
	§	
CELINA INDEPENDENT SCHOOL	§	
DISTRICT and WILLIAM CALEB	§	
ELLIOTT,	§	
	§	
Defendants.	§	COLLIN COUNTY, TEXAS

#### DEFENDANT CELINA INDEPENDENT SCHOOL DISTRICT'S ORIGINAL ANSWER

Defendant Celina Independent School District ("Celina ISD") files the following original answer to Plaintiffs' First Amended Petition.

#### I. GENERAL DENIAL

Pursuant to Rule 92 of the Texas Rules of Civil Procedure, Celina ISD generally denies each and every material allegation and demand for relief asserted in Plaintiffs' First Amended Petition, including any amendments or supplements thereto, and demands strict proof thereof.

#### II. AFFIRMATIVE DEFENSE

Celina ISD asserts governmental immunity with respect to all claims based on acts or omissions occurring before the effective date of Tex. Civ. Prac. & Rem. Code Chapter 118.

### III. PRAYER

For these reasons, Celina ISD asks the Court to dismiss this suit, render judgment that Plaintiffs take nothing, assess costs against Plaintiffs, and award Celina ISD all other relief to which Celina ISD is entitled.

Respectfully submitted,

# ABERNATHY, ROEDER, BOYD & HULLETT, P.C.

/s/ Charles J. Crawford

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ATTORNEYS FOR DEFENDANT CELINA INDEPENDENT SCHOOL DISTRICT

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via the electronic document filing system in accordance with the TEXAS RULES OF CIVIL PROCEDURE on November 17, 2025.

/s/ Charles J. Crawford

**Charles J. Crawford**