

SG

CAUSE NO. DC-2025-CV-1584

JANE DOE, INDIVIDUALLY AND AS	§	IN THE _____ DISTRICT COURT
NEXT FRIEND OF JOHN DOE, A	§	
MINOR CHILD,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	OF
	§	
	§	
SAMANTHA REASONER, and	§	
LUBBOCK INDEPENDENT SCHOOL	§	
DISTRICT,	§	
<i>Defendants.</i>	§	LUBBOCK COUNTY, TEXAS

PLAINTIFFS' ORIGINAL PETITION AND JURY DEMAND

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Jane Doe, Individually and as Next Friend of John Doe, a Minor Child, Plaintiffs, complaining of Samantha Reasoner (Reasoner) and Lubbock Independent School District (herein after LISD), Defendants, and would respectfully show the Court as follows:

I. DISCOVERY

1.01 Pursuant to Rule 190.1 of the Texas Rules of Civil Procedure, Plaintiffs intend to conduct discovery in this case under level 3 (Rule 190.4 Texas Rules of Civil Procedure).

II. PARTIES

2.01 Plaintiff Jane Doe is the mother of Plaintiff John Doe, a minor child. Plaintiff Jane Doe is a resident of the State of Texas. In accordance with Tex. Civ. Prac. & Rem. Code Ann. §30.013, Plaintiff is pursuing this matter through a pseudonym to protect her and her child's identity. As such, she is not required to provide identifying information as part of this pleading and thus avails herself of this protection. Plaintiff's identity is known to Defendants.

2.02 Plaintiff John Doe, a minor child, is a resident of the State of Texas. Plaintiff is pursuing this matter through a pseudonym to protect his identity as a victim of childhood sexual assault in accordance with Tex. Civ. Prac. & Rem. Code Ann. §30.013. As such, he is not required to provide identifying information as part of this pleading and thus avails himself of this protection. Plaintiff's identity is known to Defendants.

2.03 Samantha Reasoner (Reasoner) is an individual and resident of Lubbock County, Texas. Reasoner may be served at her last known address or wherever she may be found: 10409 Valencia Avenue, Lubbock, Texas 79424.

2.04 Lubbock ISD is a political subdivision, and as such, pursuant to TEX. CIV. PRAC. REM. CODE § 17.024(c), the school district may be served by and through its superintendent: Kathy Rollo, Ed.D., at 1628 19th Street, Lubbock, Texas 79401 or wherever she may be found.

III. VENUE AND JURISDICTION

3.01 Venue is proper in Lubbock County, Texas, pursuant to TEX. CIV. PRAC. REM. CODE § 15.002(a)(2) because it is the county of Defendant's residence at the time the cause of action accrued.

3.02 The amount of the Plaintiffs' damages is substantial and well in excess of the jurisdictional minimums of this Court. Many elements of damage cannot be determined with mathematical precision. Furthermore, the determination of many of these elements of damage is peculiarly within the province of the jury. Plaintiffs do not at this time seek any certain amount of damages for any particular element of damage but affirmatively state that they seek monetary damages exceeding the limits set out in Tex. R. Civ. P. 47(c)(1) and affirmatively plead that the monetary damages sought will fall within the limits set out in Tex. R. Civ. P. 47(c)(4), or the highest amount allowed under the law. Plaintiffs also seek judgment for all other relief to which Plaintiffs are

entitled. Plaintiffs reserve the right to file an amended pleading on this issue should subsequent evidence show this figure to be either too high or too low. Plaintiffs also seek judgment for all other relief to which Plaintiffs are entitled.

IV. PLAINTIFFS' NARRATIVE

4.01 Reasoner is a teacher in Lubbock ISD at Nat Williams Elementary School located at 4812 58th Street, Lubbock, Texas 79414. During the 2025-2026 school year, she was entrusted by Lubbock ISD to be a Pre-Kindergarten teacher for three-year-old children.

4.02 On more than one occasion, during nap time in the month of September 2025, Reasoner sexually abused and assaulted John Doe. Reasoner used her position as a trusted caretaker of small, impressionable children, some of whom were non-verbal, for her own pleasure. Reasoner's inexcusable acts of sexual abuse have caused severe and permanent emotional distress and trauma to John Doe.

4.03 Upon information and belief, Lubbock ISD knew of several safety concerns and issues related to Reasoner's performance as a teacher and allowed her to remain the Pre-Kindergarten teacher for a classroom full of three-year-old children. In addition, Lubbock ISD failed to report the abuse. Lubbock ISD and their employee's actions allowed the abuse to continue furthering the severe and permanent emotional distress to John Doe.

V. CAUSES OF ACTION

Reasoner's Sexual Assault and Battery of a Child

5.01 Plaintiff John Doe was a minor at all times relevant herein. Reasoner used the trust she gained from Plaintiff Doe to commit acts of sexual assault and sexual battery of Plaintiff Doe. Reasoner committed these acts intentionally and knowingly.

5.02 As a result of Reasoner's conduct, Plaintiff John Doe has suffered, and continues to suffer, pain of the mind and body, mental anguish, humiliation, disgrace, psychological repercussions, and emotional distress.

Intentional Infliction of Emotional Distress

5.03 Reasoner is liable to Plaintiff John Doe for Intentional Infliction of Emotional Distress. Reasoner adopted the trust of John Doe during a vulnerable time in the child's life – his very first weeks in the public school system. Reasoner used that trust to commit acts of sexual assault and battery of the child, which constitutes extreme and outrageous conduct.

5.04 Plaintiff Doe has suffered mental and physical injuries as a direct and proximate result of Reasoner's conduct.

Lubbock ISD's Gross Negligence

5.05 At all relevant times, Reasoner gained access to John Doe while in a position entrusted to her by Lubbock ISD. Lubbock ISD was grossly negligent and/or reckless in hiring, supervising, and employing Reasoner, and therefore, pursuant to TEX. CIV. PRAC. REM. CODE § 118.002(a), Lubbock ISD is directly liable for her actions of sexual misconduct with John Doe, as well as the failure to report the abuse.

Waiver of Governmental Immunity Under TEX. CIV. PRAC. REM. CODE § 118.006

5.06 As described in detail above, this action is being brought under TEX. CIV. PRAC. REM. CODE § 118. This section abolishes official immunity for a public school that is grossly negligent or reckless . . . in hiring, supervising, or employing a teacher that commits sexual misconduct or fails to report such misconduct. Therefore, pursuant to TEX. CIV. PRAC. REM. CODE § 118.006, Lubbock ISD may not assert governmental immunity from liability.

VI. DAMAGES

6.01 Defendants' misconduct resulted in and proximately caused injury to the minor Plaintiff.

Plaintiff John Doe's damages include, but are not limited to, the following:

- a. Severe psychological pain and mental anguish;
- b. Severe psychological pain and mental anguish that, in reasonable probability, will be sustained in the future;
- c. Emotional distress sustained in the past;
- d. Emotional distress that, in reasonable probability, will be sustained in the future;
- e. Medical expenses sustained in the past (Jane Doe); and,
- f. Medical expenses that, in reasonable probability, will be sustained in the future (to Jane Doe for those prior to eighteen years of age; to John Doe for those sustained after the age of eighteen.)

6.02 Pursuant to TEX. CIV. PRAC. REM. CODE § 118.004, Defendants are also liable to Plaintiffs for court costs, and reasonable and necessary attorneys' fees.

VII. PRAYER

7.01 WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request the Defendants be cited to appear and answer and that upon final trial by jury, Plaintiffs recover against Defendant the following:

- a. Actual compensatory damages and punitive damages;
- b. Pre-judgment and post-judgment interest as allowed by law;
- c. Costs of court;
- d. Reasonable and necessary attorney's fees; and
- e. Such other, further and different relief to which Plaintiffs may be justly entitled.

Respectfully Submitted,

GLASHEEN, VALLES & INDERMAN, LLP
P.O. Box 1976 (79408-1976)
1302 Texas Avenue
Lubbock, Texas 79401
(806) 776-1337 - Telephone
(806) 329-4663 – Facsimile
efile.laney.piercy@gvilaw.com

/s/ Delaney Piercy
Delaney Piercy
State Bar No. 24097549

JURY DEMAND

Plaintiffs hereby respectfully demand a trial by jury in this cause and herewith pay the required fee.

/s/ Delaney Piercy
Delaney Piercy

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Ashley Llanas on behalf of Laney Piercy

Bar No. 24097549

Ashley.llanas@gvilaw.com

Envelope ID: 106311026

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Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Delaney Piercy		efile.laney.piercy@gvilaw.com	10/1/2025 11:59:05 AM	NOT SENT