

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

**Timothy Jackson,**

Plaintiff,

v.

**Laura Wright, Milton B. Lee, Melisa Denis, Mary Denny, Daniel Feehan, A.K. Mago, Carlos Munguia, and G. Brint Ryan,** each in their official capacities as members of the Board of Regents for the University of North Texas System; **Rachel Gain; Ellen Bakulina; Andrew Chung; Diego Cubero; Steven Friedson; Rebecca Dowd Geoffroy-Schwinden; Benjamin Graf; Frank Heidlberger; Bernardo Illari; Justin Lavacek; Peter Mondelli; Margaret Notley; April L. Prince; Cathy Ragland; Gillian Robertson; Hendrik Schulze; Vivek Virani; and Brian F. Wright,** Defendants.

Case No. 4:21-cv-00033-ALM

**AFFIDAVIT OF VERIFICATION**

I, Timothy Jackson, do hereby depose and swear the following statements upon my oath.

1. I am the plaintiff in the above-captioned case.
2. My birthdate is September 28, 1958, and my address is 2104 Lamp-lighter Drive, Flower Mound, Texas 75028.
3. I declare under penalty of perjury that the factual allegations in the foregoing Motion for Expedited Discovery or, in the Alternative, Petition to Conduct Depositions to Perpetuate Testimony are true and correct to the best of my

knowledge and, to the extent facts set forth in this Petition are alleged on the basis of knowledge and belief, I believe them to be true.

4. Exhibit 1 attached to this Motion is a true copy of an email I received, dated July 30, 2020.

5. Exhibit 2 attached to this Motion is a true copy of an email I received, dated July 29, 2020.

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Timothy Jackson

Executed in Denton County, State of Texas, on the 8th day of March, 2021.

BEFORE ME, the on this day personally appeared Timothy Jackson, who upon his oath, stated, swore, and affirmed, that he had read the foregoing Motion for Expedited Discovery or, in the Alternative, Petition to Conduct Depositions to Perpetuate Testimony; that he verified the facts set forth in Section I; and that the above and foregoing facts supporting the Motion are within his personal knowledge and are true and correct; or, to the extent alleged on information and belief, he believes them to be true.

SIGNED:

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Subscribed and Sworn before me on this 8th day of March 2021.

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Notary Public in and for the State of Texas  
My Commission Expires:

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