

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

ALEK SCHOTT,

*Plaintiff,*

v.

Civil Action No. 5:23-cv-00706-OLG-RBF

BEXAR COUNTY, TEXAS,

*Defendant.*

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**PLAINTIFF’S OFFER OF PROOF ON EXCLUDED TEXT MESSAGES**

Plaintiff respectfully makes this offer of three specific text messages out of the 18 that the Court recently excluded as “post-incident conduct by Deputies Babb, Gereb, and Molina.” A copy of each of these proposed exhibits is attached.

The excluded text messages are probative of the custom:

- P-64 – A text message conversation between Bexar County Sheriff’s Office (“BCSO”) officers and Deputy Gereb showing that BCSO officials knew about the underlying custom and teased Gereb about it. Specifically, one text said that Gereb “found[,] I mean made up” probable cause. Another in that same thread teased that Gereb’s typo of “meed” probable cause, when he meant “need,” revealed what was really happening on interdiction stops: Violations were “a combination of made up and need[.]”
- P-65 – A text message from another BCSO Deputy to Deputy Gereb saying “Bet ur dash didn’t catch it. Sounds right for interdiction deputies.” This message further shows that BCSO officers knew about the underlying custom.
- P-68 – A text message conversation between Deputy Molina and Deputy Babb discussing Alek Schott’s traffic stop. In the conversation, Molina confirms that he was aware of Babb’s “interdiction techniques,” including “sitting [Alek] in [Babb’s] truck and just talking while you write the ticket and wait for the k9,” and Molina states that he and Babb “did everything by the book” on Alek’s stop.

Date: September 28, 2026

Respectfully submitted,

/s/ Christen M. Hebert

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**Certificate of Service**

I certify that on September 28, 2026, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will provide electronic service upon all attorneys of record.

/s/ Christen Mason Hebert  
Christen Mason Hebert