IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR THE PASCO COUNTY, FLORIDA

TRULIEVE, INC., *Plaintiff*, v. NATHAN JUREWICZ, *Defendant*.	Case No. 2025-CA-001071-CAAXS

PLAINTIFF TRULIEVE INC.'S RESPONSES AND
OBJECTIONS TO DEFENDANT'S FIRST REQUEST FOR PRODUCTION

Plaintiff Trulieve, Inc. responds as follows to Defendant Nathan Jurewicz's First Request for Production of Documents (Nos. 1-14).

GENERAL OBJECTIONS

Any response or objection made herein is expressly subject to and without waiver of the following General Objections, which are incorporated by reference into each response:

1. These Responses and Objections are made without waiver of any objection, and Plaintiff reserves the right to amend these Responses and Objections at any future date as permitted by applicable rules.

2. Any statement that Plaintiff will produce documents means that Plaintiff will produce any responsive, non-privileged documents in Plaintiff's possession, custody, or control, to the extent they exist and can be located after a reasonable and diligent search. Nothing herein should be construed as an admission as to the existence, relevance, or admissibility of any document or information.

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3. Plaintiff objects to the Requests to the extent they seek the production of documents protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or protection. Such documents will not be produced, and any unintentional production does not constitute any waiver of privilege or protection as to the produced document or any related material. Should any unintentional production occur, Plaintiff reserves the right to demand the immediate return of unintentionally produced documents.

4. Plaintiff objects to the Requests to the extent they seek the production of documents which are already in Defendant's possession, equally available to Defendant, or more readily obtainable from public sources, such that production by Plaintiff would be unduly burdensome or duplicative.

REQUEST NO. 1

All Communications between You and Indiegogo, Inc. concerning the Campaign, GanjaLeaks, Nathan Jurewicz, or the Posts.

RESPONSE:

No such communications exist.

REQUEST NO. 2

All Communications between You and Stripe concerning the Campaign, GanjaLeaks, Nathan Jurewicz, or the Posts.

RESPONSE:

No such communications exist.

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REQUEST NO. 3

All Communications between You and any other crowdfunding service or payment processor (including GoFundMe) concerning the Campaign, GanjaLeaks, Nathan Jurewicz, or the Posts.

RESPONSE:

No such communications exist.

REQUEST NO. 4

All Communications between You and X Corp. (Twitter) concerning GanjaLeaks, Nathan Jurewicz, or the Posts.

RESPONSE:

No such communications exist.

REQUEST NO. 5

All Communications between You and Meta Platforms, Inc. (including Facebook and Instagram) concerning GanjaLeaks, Nathan Jurewicz, or the Posts.

RESPONSE:

No such communications exist.

REQUEST NO. 6

All Communications between You and Indiegogo, Inc., X Corp. (Twitter), Meta Platforms, Inc., or Stripe concerning the removal, suspension, restriction, or takedown of any GanjaLeaks account or content, or the Campaign.

RESPONSE:

No such communications exist.

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REQUEST NO. 7

All takedown notices, complaints, abuse reports, trust-and-safety requests, or similar submissions that You made to any Platform concerning GanjaLeaks, Nathan Jurewicz, the Posts, or the Campaign.

RESPONSE:

No such communications exist.

REQUEST NO. 8

All Documents reflecting any effort by You to identify, deanonymize, or unmask the operator of GanjaLeaks.

RESPONSE:

Plaintiff will produce all non-privileged Documents responsive to this Request.

REQUEST NO. 9

All internal Communications and Documents concerning the Campaign or any fundraising by or for the defense of GanjaLeaks or Nathan Jurewicz.

RESPONSE:

Plaintiff will produce all non-privileged Documents responsive to this Request.

REQUEST NO. 10

Complete copies of each of the Posts as You captured, preserved, or archived them, including screenshots, exports, and associated metadata, and Documents showing the date and manner of each capture.

RESPONSE:

Plaintiff will produce Documents responsive to this Request.

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REQUEST NO. 11

All Documents reflecting when and how You first became aware of each of the Posts.

RESPONSE:

Plaintiff will produce all non-privileged Documents responsive to this Request.

REQUEST NO. 12

All Documents supporting the allegation (Compl. ¶¶ 1, 5) that Defendant "represents" or "works for" Trulieve's competitors, including the identity of each such competitor and the basis for the allegation.

RESPONSE:

Plaintiff will produce all non-privileged Documents responsive to this Request.

REQUEST NO. 13

All Documents supporting Your claimed damages, including the alleged expenditure of "more than $62,000" to remediate the alleged defamation (Compl. ¶¶ 23–24) and any alleged lost sales, and all Documents reflecting how those amounts were calculated.

RESPONSE

Plaintiff will produce all non-privileged Documents responsive to this Request.

REQUEST NO. 14

Copies of the retraction letters referenced in the Complaint (dated September 30, 2024, February 5, 2025, and March 24, 2025) and all Documents showing their transmission to and receipt by Defendant.

RESPONSE

Plaintiff will produce Documents responsive to this Request.

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Dated: July 6, 2026

Respectfully submitted,

/s/ *Shannon B. Timmann*
Shannon B. Timmann (FL. Bar No: 98810)
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Counsel for the Plaintiff

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed on July 6, 2026, via the Florida Court's E-Filing Portal. The undersigned also provided service via email to Nathan Jurewicz at realestatetaskforce@gmail.com.

/s/ *Shannon B. Timmann*
Shannon B. Timmann
Florida Bar No. 98810