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

TRULIEVE, INC.,

Case No. 2025-CA001071-CAAXES

Plaintiff,

v.

NATHAN JUREWICZ,

Defendant.
_____/

DEFENDANT'S INITIAL DISCLOSURES

COMES NOW, Defendant, NATHAN JUREWICZ, by and through the undersigned counsel, through counsel, provides the following initial disclosures pursuant to Florida Rule of Civil Procedure 1.280(a):

A. WITNESSES:

a. Nathan Jurewicz
1938 Heron Cove Dr
Lutz FL 33549
Rabbitholeoftruth777@gmail.com

Mr. Jurewicz is the defendant and has information related to his defense against the accusations and the factual bases of the claims in this matter.

b. **Corporate representative(s) and records custodian(s) of Trulieve, Inc.**

Plaintiff's representatives have information related to the factual bases of the claims in this case, pertinent Plaintiff's records relevant to Defendant's defenses.

c. Martha Bueno (Instagram handle @buenoformiami)

d. Shai Ortiz (Instagram handle @shai.high)

e. All witnesses identified or referenced in Plaintiff's initial disclosures, discovery responses, or pre-trial disclosures.

UNOFFICIAL DOCUMENT

Discovery is ongoing and Defendant reserves the right to amend or supplement this witness disclosure.

B. DOCUMENTS:

a. All documents, electronically stored information (including emails, messages, posts, and account records), and tangible things (including electronic devices such as personal laptop and mobile phone) in Defendant's possession, custody, or control that may be used to support his defenses, particularly those related to the "GanjaLeaks" X (formerly Twitter) and Instagram accounts operated by Defendant. These items are currently located at Defendant's home address.

b. Photographs of mold in one Plaintiff's grow to be compared to a photo downloaded from the Plaintiff's website taken from the same location.

c. Video testimony from James Deese, a former Marine Corps and law enforcement veteran who was a former employee of Plaintiff exposing the issue for the amount of mold in one of Plaintiff's grow and issues with chemical violations, available on YouTube.

Discovery is ongoing and Defendant reserves the right to amend or supplement this document disclosure.

C. **COMPUTATION OF DAMAGES:**

Attorneys' fees in an amount to be determined upon conclusion of the case, calculated at an estimated reasonable hourly rate of $450.00 for reasonably incurred attorneys' fees pursuant to defendant's engagement agreement with Westchase Law, P.A., with a minimum retainer fee obligation of $10,000.00, subject to adjustment under Florida law. Defendant has not fully quantified his damages. The matter is ongoing and Defendant reserves the right to amend or supplement this computation of damages.

UNOFFICIAL DOCUMENT

D. INSURANCE:

Defendant has no insurance that would cover any damages associated with this claim.

Dated this 3rd day of October, 2025.

WESTCHASE LAW, P.A.

/s/ C. Todd Marks
C. TODD MARKS, ESQ. / FBN 019124
Service@WestchaseLaw.com
Todd@WestchaseLaw.com
12027 Whitmarsh Lane
Tampa, FL 33626
Tel: 813-490-5211
Fax: 813-463-0187
Attorney for Defendant

UNOFFICIAL DOCUMENT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via the Florida Court's E-filing Portal to **Shannon B. Timmann, Esq.**, Meier Watkins Phillips Pusch LLP, 919 18th St NW, Ste 650, Washington DC 20006 **[shannon.timmann@mwpp.com], and Melanie Leitman, Esq.**, Stearns Weaver Miller, P.A., 106 East College Ave, Ste 700, Tallahassee, FL 32301 **[mleitman@stearnsweaver.com; lrussell@stearnsweaver.com],** on this 3rd day of October, 2025.

WESTCHASE LAW, P.A.

/s/ C. Todd Marks
C. TODD MARKS, ESQ. / FBN 019124
Service@WestchaseLaw.com
Todd@WestchaseLaw.com
12027 Whitmarsh Lane
Tampa, FL 33626
Tel: 813-490-5211
Fax: 813-463-0187
Attorney for Defendant

UNOFFICIAL DOCUMENT