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

TRULIEVE, INC.

Plaintiff,

Case No.: 512025CA001071CAAXES

v.

NATHAN JUREWICZ,

Defendant.
_____/

**PLAINTIFF'S RESPONSE IN OPPOSITION
TO DEFENDANT'S MOTION FOR EXTENSION OF TIME**

Plaintiff respectfully submits that the Court should allow Defendant no more than 14 additional days to respond to discovery. Plaintiff already conditionally agreed to one two-week extension, to January 12. Rather than confer with Plaintiff about further extensions, Defendant instead rushed to Court and moved to extend the response deadline to 14 days after Defendant obtains new counsel, whenever that may be. But Defendant has failed to show good cause for such an illusory deadline. The Court should deny his request and instead require him to respond to discovery by January 26. That is more than enough time for Defendant to respond to Plaintiff's single request for production and two interrogatories.

ARGUMENT

1. From the beginning of the case, Defendant has caused unnecessary delay and expense. Before Plaintiff filed suit, Defendant ignored Plaintiff's multiple demand letters and, in an online video, falsely denied being the person behind the account that made the defamatory claims at issue in this case. (*See* Pl.'s Opp. To Def.'s Mot. Dismiss at 3.) After Plaintiff filed suit, Defendant evaded service for months, forced Plaintiff to resort to substituted service, blew the deadline to respond to the Complaint, and then, finally, once Plaintiff moved for default, admitted

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(as part of a fundraising effort) that Defendant was behind the defamatory statements, and belatedly moved to dismiss the Complaint. (*Id.* at 2-6.)

2. Defendant's delays did not stop there. On November 25, 2025, Plaintiff propounded a single request for production of documents and two interrogatories. (*See* Pl.'s Notice of Service of 1st Requests for Discovery to Def.) Defendants' response deadline was December 29, 2025. *See* Fla. R. Civ. P. 1.340(a)(9), 1.350(b)(3). On the deadline, Defendant requested a two-week extension. Plaintiff said it would grant the requested two-week extension on the condition that Defendant would "provide substantive interrogatory responses and produce his documents responsive to Plaintiff's discovery requests by January 12." (*See* Exhibit A.) Defendant agreed. But January 12 came and went, and Defendant failed to provide any discovery responses. In violation of the rules, Defendant did not ask Plaintiff for an additional extension. *See* Fla. R. Civ. P. 1.202(a) (movant must confer with opposing party before filing non-dispositive motion).

3. Defendant instead went straight to Court to seek an additional extension. In Defendant's motion, Defendant represents that "Plaintiff's counsel agreed to a two-week extension for Defendant to respond to the Discovery Request," without mentioning that Plaintiff's consent was explicitly conditioned on Defendant providing "substantive interrogatory responses and produc[ing] his documents responsive to Plaintiff's discovery requests by January 12." (*See* Exhibit A.) Beyond that, Defendant's request for a "fourteen (14) day extension of time ***from obtaining new counsel***" is illusory and unreasonable. It would effectively authorize Defendant to continue evading discovery indefinitely by not retaining new counsel. And because Defendant is an individual, not a corporate entity, he does not need representation to participate in this case.

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Defendant has failed to show good cause for such an extension. *See* Fla. R. Civ. P. 1.090(b) (court may extend deadlines for "good cause").

4. Plaintiff submits that Defendant should instead be given until January 26 (i.e., an additional 14 days) to provide substantive interrogatory responses and produce responsive documents. This extension is reasonable in light of Defendant's repeated delays, and more than sufficient given that there are only two interrogatories and a single request for production.

CONCLUSION

For the foregoing reasons, the Court should deny Defendant's motion and extend his discovery response deadline to no later than January 26, 2026.

Respectfully submitted,

/s/ *Melanie Leitman*
Melanie Leitman, Esq.
Florida Bar No. 091523
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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 this 15th day of January, 2026 via the Florida Court's E-Filing Portal, which will send notice to all counsel of record. Undersigned also provided service via email to Nathan Jurewicz at realestatetaskforce@gmail.com and certified mail at the following address: 4053 Gunn Hwy., Tampa, FL 33618.

/s/ *Melanie R. Leitman*
Melanie R. Leitman

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Subject: Re: Extension to respond to Trulieve's discovery requests
Date: Monday, December 29, 2025 at 2:48:23 PM Eastern Standard Time
From: Megan Meier
To: C. Todd Marks, Andreka Ruddock, Bianca Trevisan, Ashley Campbell, Paul Phillips
CC: Shannon Timmann, Devin Bolger, Melanie Leitman, Casey Christian
Attachments: image002.png, image003.jpg, image001.png

EXHIBIT A

Ok, that is acceptable.

Happy New Year,
Megan

Megan Meier, Founding Partner
MEIER WATKINS PHILLIPS PUSCH
We've moved! Our new address is:
1120 20th Street NW, Suite 550
Washington, DC 20036
+1 (202) 280-4454
Bio | Website | Chambers Profile | LinkedIn



From: C. Todd Marks <todd@westchaselaw.com>
Date: Monday, December 29, 2025 at 2:47 PM
To: Megan Meier <megan.meier@mwpp.com>, Andreka Ruddock <aruddock@stearnsweaver.com>, Bianca Trevisan <Bianca@westchaselaw.com>, Ashley Campbell <Ashley@westchaselaw.com>, Paul Phillips <paul@westchaselaw.com>
Cc: Shannon Timmann <shannon.timmann@mwpp.com>, Devin Bolger <devin.bolger@mwpp.com>, Melanie Leitman <mleitman@stearnsweaver.com>, Casey Christian <casey.christian@mwpp.com>
Subject: RE: Extension to respond to Trulieve's discovery requests

Correct.

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C. Todd Marks, Esq.
Managing Attorney

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From: Megan Meier <megan.meier@mwpp.com>
Sent: Monday, December 29, 2025 1:33 PM
To: C. Todd Marks <todd@westchaselaw.com>; Andreka Ruddock <aruddock@stearnsweaver.com>; Bianca Trevisan <Bianca@westchaselaw.com>; Ashley Campbell <Ashley@westchaselaw.com>; Paul Phillips <paul@westchaselaw.com>
Cc: Shannon Timmann <shannon.timmann@mwpp.com>; Devin Bolger <devin.bolger@mwpp.com>; Melanie Leitman <mleitman@stearnsweaver.com>; Casey Christian <casey.christian@mwpp.com>
Subject: Extension to respond to Trulieve's discovery requests

Hi Todd,

Will Jurewicz provide substantive interrogatory responses and produce his documents responsive to Trulieve's discovery requests by January 12?

Megan Meier, Founding Partner
MEIER WATKINS PHILLIPS PUSCH
We've moved! Our new address is:
1120 20th Street NW, Suite 550
Washington, DC 20036
+1 (202) 280-4454
Bio | Website | Chambers Profile | LinkedIn



From: C. Todd Marks <todd@westchaselaw.com>
Date: Monday, December 29, 2025 at 1:20 PM
To: Andreka Ruddock <aruddock@stearnsweaver.com>, Bianca Trevisan <Bianca@westchaselaw.com>, Ashley Campbell <Ashley@westchaselaw.com>, Paul Phillips <paul@westchaselaw.com>
Cc: Shannon Timmann <shannon.timmann@mwpp.com>, Devin Bolger <devin.bolger@mwpp.com>, Megan Meier <megan.meier@mwpp.com>, Melanie Leitman <mleitman@stearnsweaver.com>
Subject: RE: SERVICE OF COURT DOCUMENT: Trulieve, Inc. vs. Nathan Jurewicz - 2025-CA001071-CAAXES

Please consider our request to allow for an additional two weeks to respond to discovery.

Thank you.

C. Todd Marks, Esq.
Managing Attorney

Westchase Law, P.A.

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A Private Law Firm

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From: Andreka Ruddock <aruddock@stearnsweaver.com>
Sent: Tuesday, November 25, 2025 3:26 PM
To: C. Todd Marks <todd@westchaselaw.com>; Westchase Law Service <service@westchaselaw.com>
Cc: 'Shannon.timmann@mwpp.com' <Shannon.timmann@mwpp.com>; 'Devin Bolger' <devin.bolger@mwpp.com>; 'megan.meier@mwpp.com' <megan.meier@mwpp.com>; Melanie Leitman <mleitman@stearnsweaver.com>; Andreka Ruddock <aruddock@stearnsweaver.com>
Subject: SERVICE OF COURT DOCUMENT: Trulieve, Inc. vs. Nathan Jurewicz - 2025-CA001071-CAAXES

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Court Identity:	Circuit Court for the Sixth Judicial Circuit, In and For Pasco County, Florida
Case No.	2025-CA001071-CAAXES
Plaintiff	Trulieve, Inc.
Defendant	Nathan Jurewicz
Documents being served:	1. Plaintiff's Notice of Service of First Requests for Discovery to Defendant; 2. Plaintiff's First Interrogatories to Defendant; 3. Plaintiff's First Request for Production to Defendant
Sender's name:	Melanie Leitman, Esq.
Sender's phone number:	850-329-4846

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