**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.

_____/

Filed For Record
Pasco County, Florida
2025 FEB -2 PM 12:00
Nikki Alvarez-Sowles
Clerk & Comptroller
Pasco County, Florida

PLAINTIFF, TRULIEVE, INC.'S FIRST REQUEST FOR PRODUCTION TO DEFENDANT, NATHAN JUREWICZ

Plaintiff Trulieve Inc. propounds the following requests for production upon Defendant in accordance with Fla. R. Civ. P. 1.350. Defendant is requested to make such production within thirty (30) days after service of this request, at the offices of Stearns Weaver Miller Weissler Alhadeff & Sitterson, 106 E College Avenue, Suite 700, Tallahassee, FL 32301, or at such other place as may be agreed upon by the undersigned counsel. "When producing documents, the producing party shall either produce them as they are kept in the usual course of business or shall identify them to correspond with the categories in the request." Fla. R. Civ. P. 1.350(b).

REQUEST

1. Please produce all communications about Trulieve. This includes, but is not limited to, emails, text messages, and direct messages on social media applications.

Response:

** Defendant objects to this Request to the extent it is overly broad, unduly burdensome, seeks information that is irrelevant or not reasonably calculated to lead to the discovery of admissible evidence, and invades privileges protected by law. Specifically, Defendant asserts the journalist's privilege under Florida Statutes § 90.5015, which provides a qualified privilege for professional journalists not to disclose information obtained while gathering news, including the identity of sources. Defendant further asserts the qualified common-law reporter's privilege recognized by Florida courts (see, e.g., McCarty v. Bankers Ins. Co., 195 F.R.D. 39 (N.D. Fla. 2000); Kidwell v. State, 730 So. 2d 670 (Fla. 1998)), as well as protections under the First Amendment to the U.S.

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Constitution and Article I, Section 4 of the Florida Constitution, which safeguard the free flow of information from confidential sources in news gathering activities.

Subject to and without waiving these objections and privileges, Defendant produces the following non-privileged, responsive documents, which are being made available for inspection and copying at the offices of Stearns Weaver Miller Weissler Alhadeff & Sitterson, 106 E College Avenue, Suite 700, Tallahassee, FL 32301] on [date within 30 days, or as agreed]:

- Screenshots of messages received on the Ganja Leaks TikTok page dated March 9, 2024, and March 13, 2024 (labeled as TikTok Screenshot 1 and TikTok Screenshot 2).
- Email screenshots dated March 9, 2024 (labeled as Email Screenshot 1 and Email Screenshot 2), including attachments: image2.jpeg, image3.jpeg, image4.jpeg, image5.jpeg, Video_1.MOV, and Video.MOV, depicting alleged mold-infested cannabis from a Trulieve facility, provided by an anonymous source.

These documents are produced as they are kept in the usual course of business. Defendant withholds all other responsive communications on the grounds of the asserted privileges, as they involve confidential sources and information obtained in the course of journalistic activities related to matters of public concern (e.g., potential health risks from allegedly moldy cannabis products). To the extent required, Defendant will provide a privilege log upon request or court order.

Defendant reserves the right to supplement or amend this response as discovery proceeds.

Dated: January 28th 2026

/s/ Nathan Jurewicz
Nathan Jurewicz
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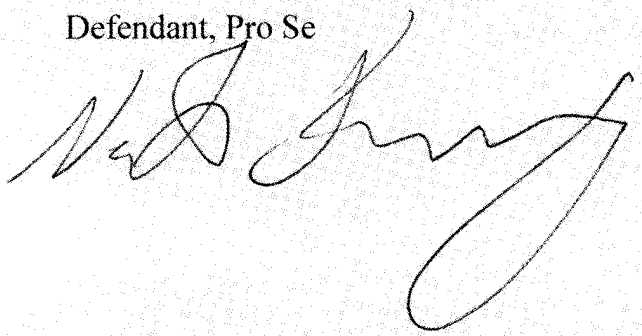
Defendant, Pro Se



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