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

TRULIEVE, INC.

Plaintiff,

Case No. 2025-CA001071-CAAXES

v.

NATHAN JUREWICZ,

Defendant.

TRULIEVE INC.'S AMENDED[1] MOTION TO COMPEL

Plaintiff respectfully moves this Court to compel Defendant to fully and properly answer or produce documents responsive to Plaintiff's discovery requests. On November 25, 2025, Plaintiff served a single request for production and two interrogatories on Defendant. Each discovery request seeks information or documents that are not only relevant but essential to the elements of Plaintiff's defamation claim. After months of delay, Defendant finally served responses on February 2, 2026, but Defendant's responses were replete with impermissible and baseless objections. Despite Trulieve's efforts to resolve these issues without Court intervention, Defendant still largely refuses to turn over relevant and discoverable material. Moreover, the deadline for completion of fact discovery is less than a month away—May 1. The Court should overrule Defendant's objections and order him to immediately respond in full and produce responsive documents.

[1] Trulieve files this amended motion to compel to include the mistakenly-omitted certificate of conferral, to more fully quote the discovery requests and responses at issue in the body of the motion, and to attach a corrected version of Exhibit A.

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BACKGROUND

Defendant Nate Jurewicz creates and operates social media accounts under the pseudonym "GanjaLeaks." (Compl. ¶ 5.) Hiding anonymously behind that moniker, Defendant posted a series of defamatory accusations about Plaintiff Trulieve throughout 2024 and 2025, falsely accusing Plaintiff of, among other things, "poisoning" its customers with illegal pesticides, deleting consumer complaints on Florida's Department of Agriculture and Consumer Services website, and "hiring illegal workers." (*Id.* ¶ 11.) After thousands of social media users saw these false claims, Trulieve set out to unmask GanjaLeaks so that it could put them on notice of the falsity of their claims and demand a retraction; after doing so, Trulieve ultimately sent Defendant a series of letters providing facts and evidence debunking his falsehoods. (*Id.* ¶ 19, 21.) After receiving Trulieve's first retraction demand, Defendant published a video in which he acknowledged receiving the letter and endorsed "GanjaLeaks's" work but denied he was GanjaLeaks and never retracted any statements. (*Id.* ¶ 19; Pl.'s Mot. Default, Exhibit A, ¶ 5).

Trulieve filed this action on April 10, 2025, alleging Defendant hid behind the anonymity of the GanjaLeaks social media accounts to repeatedly defame Trulieve by falsely accusing the company of poisoning patients with illegal pesticides and mold, deleting consumer complaints on a government website, and of hiring "illegal workers." The Complaint further alleges that, on information and belief, Defendant works for and has previously worked for a number of Trulieve's competitors and that he published the statements at issue with actual malice by "either knowingly or recklessly disregarding" the truth, "including by setting out with a financially motivated bias and a negative preconceived narrative to disparage his clients' biggest competitor," and "intentionally disregarding the publicly available sources" debunking his false claims. (Compl. ¶¶ 1, 19).

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After the Complaint was filed, Defendant concealed his whereabouts and actively evaded service for two months, forcing Trulieve to initiate substituted process through Florida's Secretary of State, which was completed on July 2, 2025, and required Defendant to respond to the Complaint by July 22, 2025. (*See* Pl.'s Mot. Default.) From there, another two months passed without any response from Defendant, and Trulieve was left with no choice but to move for judicial default on August 10, 2025. *Id.*

Trulieve then served a few narrowly tailored discovery requests on Defendant, which Defendant largely objected to, and which form the basis for this motion. (Ex. A.) In particular, Trulieve's first (and only) request for production asked Defendant to "Please produce all communications about Trulieve. This includes, but is not limited to, emails, text messages, and direct messages on social media application." (*Id.*) Defendant responded by stating "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." (*Id.*) He went on to object in large part by asserting the "journalist's privilege under Florida Statutes § 90.5015" as well as the "qualified common-law reporter's privilege recognized by Florida courts" and "protections under the First Amendment to the U.S. Constitution and Article I, Section 4 of the Florida Constitution." (*Id.*) In follow-up communications with counsel, Defendant confirmed that he was not producing all communications about Trulieve, writing simply "[y]ou guys don't just get to invade my privacy and get every msg mentioning the word Trulieve." (Ex. B.) Defendant also objected to the two interrogatories Trulieve served. Trulieve's second interrogatory asked Defendant to "Please identify everyone with whom you have communicated about Trulieve. For each person, state: a. The date of each communication; b. The means or manner of each communication (i.e., in-person, telephone, etc.,);

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and c. The substance of each communication (i.e. who said what). This interrogatory does not require you to provide information about communications apparent from the communications you produce in response to Request for Production No. 1. It also does not require you to identify all persons who viewed your social media posts." (Ex. A.) In response, Defendant stated "Defendant objects to this Interrogatory as overly broad, unduly burdensome, seeking information that is irrelevant or not reasonably calculated to lead to the discovery of admissible evidence, and seeking information protected by privilege." (*Id.*) Defendant went on to object more specifically on the basis of the journalist's privilege, the common-law reporter's privilege, and constitutional protections. (*Id.*) Trulieve's first interrogatory asked for Defendant to "Please identify all social media accounts that you have used or controlled. For each account, please identify: a. Your name, username, or handle; and b. The social media platform associated with the account (e.g., X, Instagram, etc.)." (*Id.*) In response, Defendant stated that "Defendant objects to this Interrogatory to the extent it is overly broad, unduly burdensome, seeks information not relevant to the claims or defenses in this action, and invades Defendant's right to privacy under the Florida Constitution and common law." (*Id.*)

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ARGUMENT

A. The material sought by Trulieve is plainly relevant and proportional to the needs of the case.

Under the Florida Rules of Civil Procedure, "[p]arties may obtain discovery regarding any nonprivileged matter that is relevant to any party's claim or defense and proportional to the needs of the case." Fla. R. Civ. P. 1.280. When a party fails to respond to such discovery, Florida Rule of Civil Procedure 1.380 provides that "[o]n reasonable notice to other parties and all persons affected, a party may apply for an order compelling discovery…[if] a party fails to answer an interrogatory submitted under rule 1.340… [or] if a party fails to produce documents and things

under rule 1.350(b)." Importantly, "an evasive or incomplete answer is treated as a failure to answer." *Id.* The scope of discovery is broader than that which can be introduced at trial; "a party may be permitted to discover relevant evidence that would be inadmissible at trial, so long as it may lead to the discovery of admissible evidence." *Amente v. Newman*, 653 So. 2d 1030, 1032 (Fla. 1995).

Here, the categories of information sought are plainly relevant and proportional to the needs of the case. For starters, Trulieve's requests are narrowly tailored; in total, Trulieve only propounded three discovery requests on Defendant, and they merely ask Defendant to produce his communications about Trulieve, describe any communications about Trulieve that would not be apparent from his production, and identify his social media accounts. (Ex. A.) And these requests are also relevant; they each seek discovery into materials that would help Trulieve establish elements of its claim for defamation. For example, Defendant's documents and communications about Trulieve could speak to the credibility of Defendant's so-called "sources" and the "evidence" he claims substantiate the statements at issue or—as alleged in the Complaint—to the existence of a "financially motivated bias and a negative preconceived narrative to disparage" Trulieve, each of which is evidence of actual malice. (Compl. ¶ 19*); see Harte-Hanks Commc'ns v. Connaughton*, 491 U.S. 657, 688 (1989); *see also* 1 Rodney Smolla, Law of Defamation § 3:71 (2d ed.) ("Evidence that a defendant conceived a story line in advance of an investigation and then consciously set out to make the evidence conform to the preconceived story is evidence of actual malice, and may often prove to be quite powerful evidence."). In short then, Trulieve's discovery requests are both relevant and proportional to the needs of the case, and Defendant should thus be compelled to answer them in full.

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B. Neither the journalist's privilege, nor the common-law reporter's privilege, nor vague "constitutional protections" are applicable to Defendant to avoid answering discovery in this action.

Defendant objects in large part to Trulieve's discovery requests asking for his communications about Trulieve and the identity of those he communicated with about Trulieve on the basis that the Florida's journalist privilege, the common-law reporter's privilege, and protections under the U.S. and Florida constitutions apply to protect him from having to provide such information. They do not.

First, under Florida's journalist privilege statute, Florida Statute § 90.5015, the journalist's privilege only applies to a "professional journalist", which is defined as "a person regularly engaged in collecting, photographing, recording, writing, editing, reporting, or publishing news, for gain or livelihood, who obtained the information sought while working as a salaried employee of, or independent contractor for, a newspaper, news journal, news agency, press association, wire service, radio or television station, network, or news magazine." Fla. Stat. 90.5015 (1)(b). The Defendant does not fit within that definition; he is not regularly engaged in publishing news for his livelihood, nor is he an employee or contractor of a news organization. Florida courts have agreed. A Florida court found that the founder of a YouTube news and commentary channel was not a professional journalist, and therefore could not invoke the journalist's privilege, as he was self-employed, and YouTube did not constitute a "newspaper" or "news journal." *Popcorned Planet, Inc. v. Lively*, No. 8:25-MC-28-WFJ-LSG, 2025 WL 3458601, at *1 (M.D. Fla. Dec. 2, 2025). Indeed, "Florida Courts have historically held that the journalist privilege applies to journalists employed or hired by traditional media outlets." *Techtronic Indus. Co. Ltd. v. Victor Bonilla*, No. 823CV01734CEHAEP, 2024 WL 361247, at *1 (M.D. Fla. Jan. 31, 2024). Defendant, who merely runs his own social media accounts about cannabis under the pseudonym "GanjaLeaks," is manifestly not a journalist that has been employed or hired by a traditional media

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outlet. And even if Defendant could assert the journalist's privilege (which he cannot), Trulieve would be able to overcome the privilege as "where the media and newspaper reporter involved are defendants in the libel suit, upholding the [journalist's] privilege is also less compelling...[and] '[w]hen weighed against the possibility that [the plaintiff] stands to lose his day in court and be denied access to the courts to redress his alleged libel if the privilege is upheld, ... the privilege must give way.'" *News-J. Corp. v. Carson*, 741 So. 2d 572, 576 (Fla. 5th DCA 1999) (internal citation omitted); *see also Cable News Network, Inc. v. Black*, 308 So. 3d 997, 1000–01 (Fla. 4th DCA 2020).

The common-law reporter's privilege that Defendant cites to in his objections to Trulieve's discovery requests also does not apply here. Defendant cites to two cases for the basis that he is protected by a common-law privilege: *McCarty v. Bankers Ins. Co.*, 195 F.R.D. 39, 44 (N.D. Fla. 1998) and *Kidwell v. State*, 730 So. 2d 670, 671 (Fla. 1998). Neither is applicable. The first addresses the ***federal*** common-law reporter's privilege. *McCarty v. Bankers Ins. Co.*, 195 F.R.D. 39, 44 (N.D. Fla. 1998). But this is not a federal case, and federal privileges therefore do not apply. *See Popcorned Planet, Inc. v. Lively*, No. 8:25-MC-28-WFJ-LSG, 2025 WL 3458601, at *2 (M.D. Fla. Dec. 2, 2025) ("'state law governs privilege regarding a claim or defense for which state law supplies the rule of decision.'") (internal citation omitted). And the second case addresses a reporter's privilege under Florida law "against the disclosure of nonconfidential information ***relevant to a criminal proceeding***." *Kidwell v. State*, 730 So. 2d 670, 671 (Fla. 1998) (emphasis added). As this is not a criminal case, that case also does not apply.

As for Defendant's vague assertions about constitutional protections under both Florida and the United States' Constitutions protecting him from having to disclose his sources, he points

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to no caselaw, nor could he, that would back up the assertion that those Constitutions blanketly protect defendants in civil actions from handing over discovery about confidential sources.

C. Defendant also cannot hide behind "privacy" assertions to avoid turning over discoverable material.

In response to Trulieve's Interrogatory No. 1 (and in a follow-up email discussing his discovery responses), Defendant raised an objection based in the Florida Constitution's right to privacy and Florida's common law privacy rights. (Exs. A and B.) Interrogatory No. 1 asked Defendant to "identify all social media accounts that [he] used or controlled." (Ex. A.) While Defendant listed several of his accounts, he objected on the basis of privacy to listing all of them, noting that he had "not identified additional personal or unrelated accounts" as he considered them "irrelevant to the allegedly defamatory statements." (*Id.*) And in a follow up email about all the discovery requests, Defendant doubled down on his refusal to turn over all communications related to Trulieve, writing "You guys don't just get to invade my privacy and get every msg mentioning the word Trulieve." (Ex. B.)

Article I, Section 23 of the Florida Constitution guarantees "every natural person . . . the right to be let alone and free from governmental intrusion into the person's private life." Art. I, § 23, Fla. Const. This right is not absolute when asserted as a defense against discovery requests. *See Nucci v. Target Corp.*, 162 So.3d 146, 153 (Fla. 4th DCA 2015). In fact, the "'potential for invasion of privacy is inherent in the litigation process.'" *Hauser v. Volusia Cnty. Dep't of Corr.*, 872 So. 2d 987, 991 (Fla. 1st DCA 2004) (internal citations omitted).

Florida courts have routinely held that content posted to social media sites is not privileged or protected by any right to privacy. *See Nucci*, 162 So.3d at 153 (holding that "photographs posted on a social networking site are neither privileged nor protected by any right of privacy"); *see also Davenport v. State Farm Mut. Auto. Ins. Co.*, No. 3:11-CV-632-J-JBT, 2012 WL 555759,

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at *1 (M.D. Fla. Feb. 21, 2012) (explaining that, generally, content posted to social networking sites is "neither privileged nor protected by any right of privacy"); *see also Beswick v. North West Medical Center, Inc.*, No. 03, 2011 WL 7005038 (Fla. 17th Cir. Ct. Nov. 03, 2011) (holding that "information that an individual shares through social networking web-sites . . . may be copied and disseminated by another, rendering any expectation of privacy meaningless").

Even if a right to privacy did attach to Defendant's social media accounts, Trulieve would still be able to overcome any objection on privacy grounds by showing that such discovery is reasonably calculated to lead to admissible evidence. *Nucci*, 162 So.3d at 154. Here, Trulieve seeks information about all of Jurewicz's social media accounts because he has used his social media accounts to disseminate false claims about Trulieve. The disclosure of his social media accounts is likely to lead to admissible evidence that Trulieve can use at trial and could also reveal that Defendant disseminated his defamatory claims beyond just his known social media accounts. Defendant's social media accounts are therefore central to the claims in this case, so any right to privacy that may have attached to any of his accounts is overcome.

As for Defendant's throwaway objection that a right to privacy protects him from turning over his communications related to Trulieve, Defendant cannot support that assertion. In discussing Florida's constitutional right to privacy, Florida courts have noted that "'there can be no doubt that the Florida amendment was intended to protect the right to determine whether or not ***sensitive information about oneself will be disclosed to others***.'" *Hauser* 872 So. 2d at 991 (*quoting Rasmussen v. S. Fla. Blood Serv.*, 500 So.2d 533, 535 (Fla.1987) (emphasis added)). Trulieve's discovery requests into Defendant's communications about Trulieve do not seek sensitive information about Defendant; thus, no privacy right applies, and Defendant should be ordered to produce the requested information.

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CONCLUSION

For the foregoing reasons, Trulieve respectfully requests that the Court enter an order directing Defendant to respond in full to Trulieve's discovery requests.

Respectfully submitted,

/s/ Shannon B. Timmann
Shannon B. Timmann
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Hannah Menchel (*pro hac vice pending*)
Florida Bar No. 98810
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106 East College Avenue, Ste. 700
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Counsel for the Plaintiff

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CERTIFICATE OF CONFERRAL

I certify that although conferral prior to filing is not required under Rule 1.202(c) because the non-movant is unrepresented by counsel, prior to filing this motion, I discussed the relief requested in this motion by email and the parties were unable to resolve the dispute.

/s/ Shannon B. Timmann
Shannon B. Timmann

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed April 29, 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

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Exhibit A

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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, TRULIEVE, INC.'S FIRST INTERROGATORIES TO DEFENDANT, NATHAN JUREWICZ

Plaintiff Trulieve Inc. propounds the following interrogatories upon Defendant pursuant to Rule 1.340, Fla. R. Civ. P.

Interrogatories

Please identify all social media accounts that you have used or controlled. For each account, please identify:

a. Your name, username, or handle; and
b. The social media platform associated with the account (e.g., X, Instagram, etc.)

Response:

ANSWER TO INTERROGATORY NO. 1:
Defendant objects to this Interrogatory to the extent it is overly broad, unduly burdensome, seeks information not relevant to the claims or defenses in this action, and invades Defendant's right to privacy under the Florida Constitution and common law. Subject to and without waiving these objections, Defendant identifies the following social media account used in connection with the publications at issue in this case:

- Platform: TikTok
  Username/Handle: @ganjaleaks
  Associated Name: Nate Jurewicz / Ganja Leaks

- Platform: Instagram
  Username/Handle: @ganjaleaks

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Associated Name: Nate Jurewicz/Ganja Leaks
- Platform: Youtube
Username/Handle: YouTube.com/ganjaleaks
Associated Name: Nate Jurewicz/Ganjaleaks
2nd Youtube Account: youtube.com/NateJurewicz
Associated Name: Nate Jurewicz/Ganjaleaks

- Platform: X
Username/Handle: Ganjaleaks
Associated Name: Nate Jurewicz/Ganjaleaks

- Platform: Reddit
  Username/Handle: u/Ganjaleaks
  Associated Name: Nate Jurewicz/Ganjaleaks

- Platform: Facebook
  Username/Handle: u/wwjdweed
  Associated Name: Nate Jurewicz/Christians For Cannabis

Defendant has not identified additional personal or unrelated accounts, as they are irrelevant to the allegedly defamatory statements or the claims/defenses in this action. Defendant reserves the right to supplement this answer if additional relevant accounts are identified.

2. Please identify everyone with whom you have communicated about Trulieve. For each person, state:

a. The date of each communication;
b. The means or manner of each communication (i.e., in-person, telephone, etc.); and
c. The substance of each communication (i.e., who said what).
This interrogatory does not require you to provide information about communications apparent from the communications you produce in response to Request for Production No. 1. It also does not require you to identify all persons who viewed your social media posts.

Response:

Defendant objects to this Interrogatory as overly broad, unduly burdensome, seeking information that is irrelevant or not reasonably calculated to lead to the discovery of admissible evidence, and seeking information protected by privilege. Specifically, Defendant asserts the following privileges:

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- The qualified journalist's privilege under Florida Statutes § 90.5015, which protects professional journalists (and, to the extent applicable, those functionally engaged in newsgathering and dissemination of news on matters of public concern) from compelled disclosure of information obtained in the course of newsgathering, including the identity of sources.
- The common-law reporter's privilege recognized by Florida courts, which protects confidential newsgathering information and source identities in civil litigation unless the requesting party demonstrates that the information is relevant and material, unavailable from alternative sources despite reasonable efforts, and that there is a compelling need for disclosure that outweighs the public interest in protecting the free flow of information.

- Constitutional protections under the First Amendment to the United States Constitution and Article I, Section 4 of the Florida Constitution, which safeguard the ability to gather and publish information on matters of public interest (including potential public health risks from cannabis products) without compelled disclosure of confidential sources.

These privileges apply because the communications at issue involve confidential sources who provided information and materials regarding alleged mold in Trulieve facilities, which formed the basis for Defendant's public posts on matters of public concern.

Subject to and without waiving the foregoing objections and privileges, Defendant answers as follows:

- Defendant has engaged in public communications about Trulieve via social media posts on the @ganjaleaks TikTok, Instagram, X & Reddit account (e.g., videos and posts sharing the provided photos/videos and screenshots of source messages). The content and recipients of these public communications are apparent from publicly available records and the documents Defendant has produced or will produce in response to Plaintiff's Request for Production No. 1. No further identification is required for such public-facing activity.

- Defendant has not communicated about Trulieve with any non-privileged individuals in a manner relevant to the claims or defenses beyond what is reflected in the produced materials or public posts.

- All other responsive communications involve confidential sources and are withheld solely on the basis of the asserted privileges. Defendant will not disclose the identity of any confidential sources or the substance of confidential communications absent a court order determining that Plaintiff has satisfied its burden to overcome these privileges.

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Defendant reserves the right to supplement or amend these answers as additional information becomes available.

Dated: January 28, 2026

/s/ Nathan Jurewicz
Nathan Jurewicz
1938 Heron Cove Dr
Lutz FL 33549
realestatetaskforce@gmail.com
727-433-3120
Defendant, Pro Se

By: [signature]
Its: Ganja Leaf 1

STATE OF Florida

COUNTY OF Hillsborough

Sworn to and subscribed before me by means of ✓ physical presence or ___ online notarization, this 2 day of February, 2026, by Nathan Jurewicz, who has signed the foregoing Answers to Interrogatories swearing or affirming that said answers are true and correct to the best of his/her knowledge and belief.

___ Personally Known OR ✓ Produced Identification
Type of Identification Produced: License

[signature]
NOTARY PUBLIC
Print name: Jaime Chinea
Commission Expires: _____
Commission No: _____

JAIME CHINEA
Notary Public - State of Florida
Commission # HH 404002
My Comm. Expires May 30, 2027
Bonded through National Notary Assn.

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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, 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
1938 Heron Cove Dr
Lutz FL 33549
realestatetaskforce@gmail.com
727-433-3120
Defendant, Pro Se

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Exhibit B

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Subject: Re: Trulieve v. Jurewicz: Legal Obligations to Provide Documents and Information
Date: Friday, March 27, 2026 at 2:32:51 PM Eastern Daylight Time
From: Nate Jurewicz
To: Shannon Timmann
CC: Melanie Leitman, Andreka Ruddock, Megan Meier, Devin Bolger, Paralegals
Attachments: image001.png, image001.png

Shannon,

Hope all is well with you and your lawfare. Here is my response...

1. The only text msgs and emails I sent you (screen shots of Tik Tok and Email from the former employee who took the pictures of the massive amounts of mold) were just the ones that were relevant to the case. You guys don't just get to invade my privacy and get every msg mentioning the word Trulieve and just to be clear... there really isn't anything in there that's gonna help you with your case anyways.

2. Martha Bueno and Shai Ortiz are not witnesses. They have nothing to do with ganjaleaks other than the fact that they follow my work.. I never listed them as witnesses. You originally named them in your case. I was just referencing what you put in your complaint. They are just hemp advocates that I know in political circles and are not any of my sources.

3. I respectfully disagree with your position that the journalist's privilege does not apply to me in this matter. While I acknowledge the statutory definition of "professional journalist" under Fla. Stat. § 90.5015(1)(b), Florida law expressly provides that the statute "must not be construed to limit any privilege or right provided ... under law" (§ 90.5015(5)). I continue to assert a qualified common-law and First Amendment reporter's privilege over the identity of my confidential source(s) and my communications with them. As an independent citizen journalist, I gathered and published information of clear public concern regarding potential health and safety issues in a regulated cannabis facility.
I will not be withdrawing the privilege claim or producing the requested materials by the deadline you have set. The burden remains on Trulieve to make the specific showing required under Florida law (relevance/materiality, unavailability from other sources, and compelling interest) before any court may order disclosure—and only after a hearing with specific findings (§ 90.5015(2)–(3)).
If Trulieve believes the privilege does not protect this information, please proceed with an appropriate motion to compel so the Court can resolve the issue.

U can file the appropriate motion of course which I will contest and ultimately it's up to the judge but keep in mind when I tell the judge that no other Publication will cover this story because they are afraid of more lawfare from Kim Rivers and this is a public

health concern given the amount of evidence (and will be documenting all of this on Instagram with a fresh video that all of Tallahassee elected officials see because most of them follow Ganja Leaks) I don't think you're gonna win this one.

With Kim Rivers history of lobbying to put the little guy out of business, her husband doing prison time for bragging to an FBI agent about changes they made to the legislation in amendment 2, her employee that died in Massachusetts (leading to every location in that State being closed), mold that her employees personally witnessed and sold anyway by grinding it down into oil and the health complains that Holly Bell personally read through that were "accidently deleted" under Wilton Simpson (who received $190,000 from Trulieve) she really needs to be fired and her shareholders and board need to hire someone else. I also think that she should be disbarred and she should be sentenced to go teach Law at Harvard. I bet she would be really good at that job!

Have a nice day!

Sincerely,
Nate Jurewicz

On Fri, Mar 27, 2026 at 12:40PM Shannon Timmann <shannon.timmann@mwpp.com> wrote:

Nate,

We've checked our inboxes and junk folders and do not have an email from you. Please resend your email.

Thank you,

Shannon

Shannon B. Timmann, Partner

MEIER WATKINS PHILLIPS PUSCH

1120 20th Street, NW, Suite 550

Washington, DC 20036

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Direct: +1 (850) 322-8251

Website | Bio

MWPP | MEIER WATKINS PHILLIPS PUSCH

Chambers TOP RANKED USA 2025 Meier Watkins Phillips Pusch

Chambers TOP RANKED High Net Worth 2025 Meier Watkins Phillips Pusch

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From: Nate Jurewicz <realestatetaskforce@gmail.com>
Date: Friday, March 27, 2026 at 12:32 PM
To: Shannon Timmann <shannon.timmann@mwpp.com>
Cc: Melanie Leitman <mleitman@stearnsweaver.com>, Andreka Ruddock <aruddock@stearnsweaver.com>, Megan Meier <megan.meier@mwpp.com>, Devin Bolger <devin.bolger@mwpp.com>, Paralegals <paralegals@mwpp.com>
Subject: Re: Trulieve v. Jurewicz: Legal Obligations to Provide Documents and Information

I already emailed you about an hour ago. I'm not giving you my communications. Check your email.

On Fri, Mar 27, 2026 at 12:19 PM Shannon Timmann <shannon.timmann@mwpp.com> wrote:

> Hi Nathan,
>
> I'm writing to follow-up on the below email. Can you please confirm receipt and let us know if we can expect an updated set of initial disclosures and production of documents and information today?
>
> Thank you,

Shannon

Shannon B. Timmann, Partner

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Chambers TOP RANKED High Net Worth 2025 Meier Watkins Phillips Pusch

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From: Shannon Timmann <shannon.timmann@mwpp.com>
Date: Friday, March 20, 2026 at 1:23 PM
To: Nate Jurewicz <realestatetaskforce@gmail.com>
Cc: Melanie Leitman <mleitman@stearnsweaver.com>, Andreka Ruddock <aruddock@stearnsweaver.com>, Megan Meier <megan.meier@mwpp.com>, Devin Bolger <devin.bolger@mwpp.com>, Paralegals <paralegals@mwpp.com>
Subject: Trulieve v. Jurewicz: Legal Obligations to Provide Documents and Information

Hi Nathan,

We understand that you are still representing yourself in this case, but if you have retained new counsel, please forward this email to them so we can deal with them going forward.

First, please confirm that you searched for and produced all of your text messages, emails, social media messages, and any other messages on apps or platforms that relate or refer to Trulieve. If you have not searched all your devices, platforms, apps, or accounts, please search those and send us anything else about Trulieve that you may have by the end of next week, Friday, March 27, 2026.

Second, you identified Martha Bueno and Shai Ortiz as potential witnesses, but you did not explain what subjects of information they may have. Rule 1.280(a)(1)(A) of the Florida Rules of Civil Procedure requires the disclosure of any person who may have discoverable information about this case as well as "the subjects of that information-that the disclosing party may use to support its claims or defenses." Please provide that information by the end of next week, Friday, March 27, 2026.

Third, we understand that you are asserting a journalist's privilege to withhold the names of, and communications with, anonymous sources. But the journalist's privilege doesn't apply to you. It only applies to:

> "a person regularly engaged in collecting, photographing, recording, writing, editing, reporting, or publishing news, for gain or livelihood, who obtained the information sought while working as a salaried employee of, or independent contractor for, a newspaper, news journal, news agency, press association, wire service, radio or television station, network, or news magazine."

Florida Statute 90.5015 (1)(b); *see also Popcorned Planet, Inc. v. Lively*, No. 8:25-MC-28-WFJ-LSG, 2025 WL 3458601, at *1 (M.D. Fla. Dec. 2, 2025) (founder of a YouTube news and commentary channel could not invoke the journalist's privilege, as he was self-employed, and YouTube did not constitute a "newspaper" or "news journal"); *Techtronic Indus. Co. Ltd. v. Victor Bonilla*, No. 823CV01734CEHAEP, 2024 WL 361247, at *1 (M.D. Fla. Jan. 31, 2024) ("Florida Courts have historically held that the journalist privilege applies to journalists employed or hired by

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traditional media outlets.") We've attached these cases for ease of reference.

Since you're not a professional journalist employed by a traditional media outlet, please withdraw the privilege claim, identify your sources, and send over your communications with them by the end of next week, Friday, March 27, 2026.

Thank you,

Shannon

Shannon B. Timmann, Partner

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