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

TRULIEVE, INC., Plaintiff,

v.

NATHAN JUREWICZ, Defendant.

Case No.: 2025-CA001071-CAAXES

Filed For Record
Pasco County, Florida
2026 APR 21 AM 11:51
Nikki Alvarez-Sowles
Clerk & Comptroller
Pasco County, Florida

DEFENDANT'S MOTION FOR PROTECTIVE ORDER LIMITING DEPOSITION SCOPE AND STAYING DEPOSITION PENDING JUDICIAL RULING ON PRIVILEGE ISSUES

I. INTRODUCTION

Defendant Nathan Jurewicz, pro se, respectfully moves this Court for a Protective Order under Florida Rule of Civil Procedure 1.280(c), limiting the scope of his deposition and staying the deposition scheduled for April 30, 2026, pending the Court's ruling on Defendant's contemporaneously filed Opposition to Plaintiff's Motion to Compel.

II. LEGAL STANDARD

Under Florida Rule of Civil Procedure 1.280(c), the Court may issue a protective order to protect a party or deponent from unwarranted annoyance, embarrassment, oppression, or undue burden or expense. The Rule provides:

"Upon motion by a party or by the person from whom the discovery is sought, and for good cause shown, the court may make any order which justice requires to protect a party or person from unwarranted annoyance, embarrassment, oppression, or undue burden or expense."

III. GOOD CAUSE EXISTS FOR A PROTECTIVE ORDER

A. Journalist's Privilege and First Amendment Protections Are at Issue

Defendant's contemporaneously filed Opposition to Motion to Compel establishes that Plaintiff seeks to compel disclosure of Defendant's confidential sources and privileged communications. Disclosure of sources and privileged communications would violate:

1. Florida Statute section 90.5015 (statutory journalist's privilege);
2. The First Amendment (qualified privilege for information on matters of public concern);
3. The prohibition on unconstitutional retaliation for speech.

B. Deposing Defendant Before These Issues Are Resolved Is Improper

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Allowing Plaintiff to proceed with a full deposition before the Court has ruled on privilege issues would:

1. **Prejudice Defendant's ability to assert privilege** — Once answering questions under oath, Defendant may be deemed to have waived privilege over related communications;
2. **Create an improper discovery end-run** — Plaintiff's questioning itself may reveal protected information;
3. **Constitute harassment** — Requiring Defendant to appear while critical privilege issues are pending is an unwarranted burden;
4. **Violate Defendant's First Amendment rights** — Deposing Defendant about sources before privilege is adjudicated may chill his speech.

IV. REQUESTED RELIEF

Defendant respectfully requests the Court enter an Order:

1. **Staying the deposition** scheduled for April 30, 2026, and any related depositions pending the Court's ruling on Defendant's Opposition to Motion to Compel and the privilege issues raised therein;
2. **Limiting the scope of any future deposition** to prohibit questions concerning:
    - The identity of confidential sources;
    - Communications with sources during news gathering;
    - Unpublished materials and work product obtained during the investigation;
    - Any other matter protected by journalist's privilege under Florida Statute 90.5015 and the First Amendment;
3. **Allowing Defendant to assert privilege on the record** during any deposition without waiver of the privilege;
4. **Prohibiting Plaintiff from seeking discovery that circumvents** the privilege issues pending before the Court;
5. **Granting such other and further relief** as the Court deems just and proper.

V. CONCLUSION

Good cause exists for the requested Protective Order. Defendant's First Amendment rights and journalist's privilege require judicial protection before any deposition proceeds. Plaintiff will not be prejudiced by a brief stay—the deposition can proceed once the Court has ruled on the privilege issues.

Respectfully submitted,

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

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished to Shannon B. Timmann, Florida Bar No. 98810, Meier Watkins Phillips Pusch, LLP, 1120 20th Street, NW, Suite 550, Washington, DC 20036, via email on this 20th day of April, 2026.

Nathan Jurewicz

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