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] UNOPPOSED MOTION TO AMEND THE GENERAL CASE STANDING ORDER

Plaintiff Trulieve files this Unopposed Motion to Amend the General Case Standing Order and in support respectfully shows:

1. This case has experienced several unforeseen delays. Although this action was filed on April 10, 2025, Plaintiff was unable to locate Defendant to serve him with the Complaint. Plaintiff then initiated substituted process under section 48.16, Florida Statutes, and provided Defendant with notice of service on July 18, 2025.

2. Pursuant to this Court's direction, Plaintiff filed its proposed General Case Standing Order on July 1, 2025, over two weeks before Defendant had been served and nearly two months before Defendant's counsel appeared in this matter. Plaintiff offered case deadlines and a trial period without the benefit of input from the Defendant, or without any knowledge that this case would experience the various delays detailed herein.

[1] Trulieve files this amended motion to move the certificate of conferral above the signature block.

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3. Thereafter, Defendant retained counsel who appeared in this case on August 27, 2025. Defendant's counsel filed a motion to withdraw on January 8, 2026, and Defendant is now proceeding *pro se*, which, to the fault of no one, has slowed down proceedings.

4. Recently, on April 17, 2026, after back and forth on the discovery responses served by the Defendant, Plaintiff filed a motion to compel Defendant to fully and properly answer or produce documents responsive to Plaintiff's discovery requests. The parties had attempted to resolve their dispute without court involvement but were unable to do so. Defendant filed his opposition to that motion on April 21, 2026. A hearing has not yet been set on that motion.

5. On April 21, 2026, Defendant also filed a motion for protective order, stating that he would not be attending his deposition that had been noticed to take place on April 30, 2026. A hearing has not yet been set on that motion either.

6. Under the Florida Rules of Civil Procedure, "[i]f extending an individual case management deadline may affect a subsequent deadline in the case management order, parties must seek an amendment of the case management order." Fla. R. Civ. P. 1.200(e).

7. Given the need to resolve these issues before fact discovery can proceed and ultimately conclude, the parties require additional time to complete fact discovery. Under this Court's July 16, 2025 General Case Standing Order, the completion of fact discovery is set for May 1, 2026. Plaintiff requests an extension so that fact discovery will now conclude on July 31, 2026. Plaintiff likewise requests that the summary judgment deadline be moved from July 2, 2026 to October 2, 2026. Although the General Case Standing Order proposes a trial date, none has yet been set in this matter. Plaintiff proposes February 8, 2027 as a new trial readiness date.[2]

[2] Plaintiff's counsel is unavailable in January 2027 as they already have two trials scheduled that month.

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8. This extension will enable the parties to schedule hearings on the above-mentioned motions and to resolve the outstanding discovery disputes, which will in turn allow Plaintiff to take the necessary deposition of Defendant.

9. Counsel for Plaintiff conferred with Defendant, who is proceeding *pro se*, via email on April 28, 2026 and Defendant is unopposed to the requested extension of time and the new dates for completion of fact discovery and summary judgment. This relief requested is not sought for the purpose of delay but so that justice may be done.

CONCLUSION

For the foregoing reasons, Trulieve respectfully requests that the Court enter an order extending the deadline to complete fact discovery from May 1, 2026 to July 31, 2026, and the deadline for summary judgment from July 2, 2026 to October 2, 2026.

CERTIFICATE OF CONFERRAL

I certify that conferral prior to filing is not required under rule 1.202.

Respectfully submitted,

/s/ *Shannon B. Timmann*
Shannon B. Timmann
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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 April 30, 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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