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

TRULIEVE, INC., CASE NO.: 2025CA001071

Plaintiffs,

v.

NATHAN JUREWICZ,

Defendant.

NOTICE OF REFILING EXHIBITS TO SECOND AMENDED MOTION TO COMPEL

Plaintiff hereby files this Notice of Refiling Exhibits to the Second Amended Motion to Compel filed on April 30, 2026. These Exhibits, which are attached to this Notice as Exhibit A and Exhibit B, were attached to the First Amended Motion to Compel filed on April 29, 2026. For the Court's convenience and for clarification, Plaintiff did not seek the Court's approval to amend or exchange these Exhibits in Plaintiff's Second Amended Motion to Compel, and they continue to be attached to the underlying issues of Plaintiff's Second Amended Motion to Compel, which is scheduled for hearing before the Court on June 19, 2026.

Respectfully submitted,

Shannon B. Timmann
Megan L. Meier (*pro hac vice*)
Hannah Menchel (*pro hac vice*)
Florida Bar No. 98810
MEIER WATKINS PHILLIPS PUSCH LLP
1120 20th St NW, Suite 550
Washington, DC 20036
Telephone: 202-318-3655
Shannon.Timmann@mwpp.com
Megan.Meier@mwpp.com
Hannah.Menchel@mwpp.com

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Melanie Leitman, Esq.
Florida Bar No. 091523
STEARNS WEAVER MILLER WEISSLER
ALHADEFF & SITTERSON, P.A.
106 East College Avenue, Ste. 700
Tallahassee, Florida 32301
Telephone: (850) 329-4853
mleitman@stearnsweaver.com
aruddock@stearnsweaver.com

Counsel for the Plaintiff

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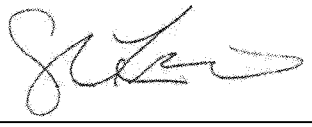
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed May 19, 2026 via the Florida Court's E-Filing Portal. The undersigned also provided service via email to Nathan Jurewicz at realestatetaskforce@gmail.com.



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

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



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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

MEIER WATKINS PHILLIPS PUSCH

1120 20th Street, NW, Suite 550

Washington, DC 20036

Direct: +1 (850) 322-8251

Website | Bio



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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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Chambers TOP RANKED High Net Worth 2025 Meier Watkins Phillips Pusch

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