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-CA-001071-CAAXES

Division: J4

DEFENDANT'S OBJECTION TO PLAINTIFF'S NOTICE OF PRODUCTION FROM NON-PARTY AND PROPOSED SUBPOENAS DUCES TECUM WITH DEPOSITION (HOLLY BELL, CHASITY MURDY, AND JAMES DEESE)

Defendant Nathan Jurewicz, appearing pro se, pursuant to Florida Rule of Civil Procedure 1.351(b), hereby objects to Plaintiff's Notice of Production from Non-Party and the three proposed Subpoenas Duces Tecum With Deposition attached thereto (Filing #250480992, filed and served June 16, 2026), directed to non-parties Holly Bell, Chasity Murdy, and James Deese. This objection is served within ten (10) days of service of the Notice and is therefore timely. Pursuant to Rule 1.351(b), upon service of this objection the documents or things described in the proposed subpoenas shall not be produced pending resolution of the objection, and no subpoena may issue until the objection is resolved. In support, Defendant states:

I. THE PROPOSED SUBPOENAS VIOLATE RULE 1.351 BECAUSE THEY COMMAND DEPOSITION TESTIMONY.

1. Plaintiff proceeded under Rule 1.351, captioning its filing a "Notice of Production from Non-Party." By its own terms, Rule 1.351 governs the "Production of Documents and Things *Without* Deposition," and it is the *exclusive* procedure for obtaining documents or things by subpoena from a non-party *without* deposing the custodian or other person in possession of them.

UNOFFICIAL DOCUMENT

2. A subpoena issued under Rule 1.351 "shall specify that no testimony may be taken and shall require only production of the documents or things specified in it." Fla. R. Civ. P. 1.351(c).

3. Each proposed subpoena, however, is styled "Subpoena Duces Tecum *With Deposition*" and expressly commands the non-party to "appear via Zoom conference before a person authorized by law to take depositions." A subpoena commanding deposition testimony cannot lawfully issue under Rule 1.351. The attached subpoenas are therefore facially non-conforming and may not issue as drafted. To the extent Plaintiff seeks to depose these non-parties, it must proceed under Rules 1.310 and 1.410, which afford Defendant separate notice and the opportunity to be heard.

II. THE REQUESTS SEEK MATERIALS PROTECTED BY THE JOURNALIST'S AND NEWSGATHERING PRIVILEGE NOW PENDING BEFORE THE COURT.

4. Each proposed subpoena contains only two requests: (1) "All Communications between you and Mr. Jurewicz (a.k.a. Ganjaleaks)"; and (2) "All Documents shared between you and Mr. Jurewicz." These requests do not seek the non-parties' independent knowledge of underlying facts. They seek, in their entirety, the reporter-source communications and newsgathering materials between Defendant and his sources.

5. Those very communications and materials are the precise subject of Defendant's pending Opposition to Plaintiff's Motion to Compel (DIN 36) and Defendant's Motion for Protective Order (DIN 37), which are set for hearing before this Court on June 19, 2026. Defendant, as the holder of the journalist's and newsgathering privilege in those communications, has standing to object to their production by subpoena to a non-party.

6. Permitting these subpoenas to issue would allow Plaintiff to extract from Defendant's sources the identical privileged material that is the subject of the June 19, 2026 hearing, before this Court has ruled on whether that material is discoverable at all. That is an improper end-run around the privilege issues pending before the Court and would moot the relief Defendant seeks. Defendant's Motion for Protective Order (DIN 37) expressly requests an order "[p]rohibiting Plaintiff from seeking discovery that circumvents the privilege issues pending before the Court." To the extent necessary, Defendant reasserts and incorporates that request and reserves the right to seek a protective order under Rule 1.280(d).

UNOFFICIAL DOCUMENT

III. THE PROPOSED SUBPOENA TO JAMES DEESE CANNOT ISSUE AS A FLORIDA SUBPOENA.

7. The proposed subpoena to James Deese is directed to an address in Leesburg, Georgia. A subpoena issued by a Florida court has no force to compel the attendance or production of a non-party who resides outside Florida. To obtain discovery from a Georgia resident, Plaintiff must domesticate any subpoena under Georgia's enactment of the Uniform Interstate Depositions and Discovery Act. The proposed Deese subpoena therefore cannot lawfully issue as a Florida subpoena.

IV. RESERVATION.

8. Defendant does not, by this objection, object to Plaintiff's obtaining — through procedurally proper means — the non-parties' independent, firsthand knowledge of matters at issue in this action. Defendant objects only to the improper procedural vehicle and to the demand for his privileged reporter-source communications and newsgathering materials. Defendant reserves all rights and the full statement of the legal and factual bases for the privilege, which will be presented at the June 19, 2026 hearing and in any subsequent briefing the Court directs.

WHEREFORE, Defendant respectfully requests that this Court (a) sustain this objection; (b) confirm that, pursuant to Rule 1.351(b), no subpoena shall issue and no production shall be required pending resolution of this objection; (c) direct that any deposition or production from the named non-parties proceed, if at all, only through procedurally proper means and consistent with the Court's ruling on the privilege issues pending for June 19, 2026; and (d) grant such other relief as the Court deems just and proper.

Respectfully submitted,

/s/ Nathan Jurewicz
Nathan Jurewicz, Defendant, Pro Se
1938 Heron Cove Dr., Lutz, FL 33549
(727) 433-3120
realestatetaskforce@gmail.com
Dated: June 16, 2026

UNOFFICIAL DOCUMENT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via the Florida Courts E-Filing Portal and served by email this 16th day of June, 2026, upon: Shannon B. Timmann (shannon.timmann@mwpp.com), Megan L. Meier (megan.meier@mwpp.com), and Hannah Menchel (hannah.menchel@mwpp.com), Meier Watkins Phillips Pusch LLP, 1120 20th Street, NW, Suite 550, Washington, DC 20036; and Melanie Leitman (mleitman@stearnsweaver.com) and Andreka Ruddock (aruddock@stearnsweaver.com), Stearns Weaver Miller Weissler Alhadeff & Sitterson, P.A., 106 East College Avenue, Suite 700, Tallahassee, Florida 32301, Counsel for Plaintiff.

/s/ Nathan Jurewicz
Nathan Jurewicz, Defendant, Pro Se

UNOFFICIAL DOCUMENT