

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
IN AND FOR ALACHUA, COUNTY, FLORIDA**

CHRISTOPHER A. HANSON,
individually and as attorney for
himself and next friend and attorney
for his two minor children,
Petitioners,

v.

Case No.: 01-2026-CA-001794

UNIVERSITY OF FLORIDA BOARD
OF TRUSTEES, and CUSTODIAN
OF PUBLIC RECORDS, UNIVERSITY
OF FLORIDA,

Respondents.

_____ /

MOTION FOR PROTECTIVE ORDER

COMES NOW, Respondent, the University of Florida Board of Trustees (the “University”), and moves that the Court issue a protective order as to Petitioner’s discovery requests, and in support states:

1. On July 13, 2026, Petitioner propounded discovery requests on the University, including *Petitioner’s First Set of Interrogatories to Respondents*, *Petitioner’s First Requests for Admission to Respondents*, and *Petitioner’s First Request to Produce to Respondents*. On July 24, 2026, Petitioner served a *Notice of Taking Deposition (Via Zoom Videoconference)* directed to John Hines, as well as a *Notice of Taking Deposition of Non-Party Witness (Via Zoom Videoconference)* and a *Subpoena for Deposition (Via Zoom Videoconference)*, both directed to Professor Jane Bambauer. These discovery requests are attached as composite **Exhibit A**.

2. The University respectfully requests that the Court issue a protective order with regard to Petitioner’s discovery requests and depositions until the Court determines the threshold issue of whether the University complied with Chapter 119. If the Court finds that the University

has complied with Chapter 119, then further discovery is unnecessary. *See Morris v. City of Miami*, 402 So. 3d 424, 426 (Fla. 3d DCA 2024).

3. “On motion by a party or by the person from whom discovery is sought, and for good cause shown, the court in which the action is pending may make any order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense that justice requires[.]” Fla. R. Civ. P. 1.280(d). For the reasons explained below, the discovery propounded by Petitioner represents an undue burden and expense for the University.

4. Good cause exists for the issuance of a protective order because Petitioner seeks to accomplish through discovery what he is not entitled to under Chapter 119. *Jones v. Miami Herald Media Co.*, 198 So. 3d 1143, 1145 (Fla. 1st DCA 2016) (Courts are not authorized “to expand the requirements of the [Public Records] Act beyond its plain language.”). Stated differently, Petitioner seeks to require the University to prove its compliance with Chapter 119, even though Petitioner bears the burden of proving the University’s non-compliance as a matter of law. *See Executive Office of Governor v. Florida Ctr. for Gov’t Accountability, Inc.*, 408 So. 3d 839, 844 (Fla. 1st DCA 2025), *reh’g denied* (Apr. 28, 2025) (“In announcing its ruling, the circuit court misplaced the burden of proof on the defendant Office.”).

5. Under Florida law, the Court must first adjudicate the University’s compliance with Chapter 119 on an accelerated basis before Petitioner engages in discovery. Petitioner’s discovery is therefore abusive and imposes an undue burden and expense on the University, especially where Petitioner has failed to present any ultimate facts showing the University did not comply with Chapter 119.

Compliance with Chapter 119 is an Immediate Threshold Issue

6. “Whenever an action is filed to enforce the provisions of [Chapter 119], the court shall set an immediate hearing, giving the case priority over other pending cases.” Section 119.11(1), Fla. Stat. (2026). This section makes it clear that proceedings under Chapter 119 are to be conducted on an accelerated basis. “[A]n accelerated civil action plays a critical role in the enforcement of the Public Records Act, as is reflected in the title of section 119.11—‘Accelerated hearing; immediate compliance.’” *Bd. of Trustees, Jacksonville Police & Fire Pension Fund v. Lee*, 189 So. 3d 120, 124 (Fla. 2016).

7. In Chapter 119 proceedings, as a threshold matter, the Court must first and foremost adjudicate the issue of whether the University produced the public records requested by Petitioner. *See Morris v. City of Miami*, 402 So. 3d 424, 426 (Fla. 3d DCA 2024); *see also News-Press Pub. Co., Inc. v. Gadd*, 388 So. 2d 276, 278 (Fla. 2d DCA 1980) (finding that “[t]he only viable issues in this action are whether the documents sought are public records and, if so, whether there are any statutory exceptions to public inspection of such documents”).

8. Thus, at this stage in the proceedings, the only issue to be determined is whether the University complied with Chapter 119. *See Morris v. City of Miami*, 402 So. 3d 424, 426 (Fla. 3d DCA 2024) (finding the issue of “whether the City had complied with its chapter 119 obligations” to be a crucial “threshold determination”).

9. Because Florida law requires accelerated disposition of Chapter 119 cases, it is simply not practical to engage in full-scale civil discovery, such as that propounded by Petitioner. The Florida Rules of Civil Procedure support this position. *See* Fla. R. Civ. P. 1.280(a)(2) and 1.200(a)(13) (removing mandamus cases filed under R. 1.630 from mandatory initial discovery disclosures and from case management procedures, respectively).

10. In this case, the record shows that the University initially received a public records request from Petitioner on March 26, 2026, generally seeking documents related to himself:

I am requesting access to inspect and copy public records **related to myself** and ongoing litigation for which I sought help from the Brechner Institute. (App. 4 (emphasis added)).¹

11. The University utilized search terms supplied by Petitioner and located documents which fell into three categories: (1) responsive public records, (2) non-responsive public records, and (3) documents which were not public records. On May 4, 2026, the University delivered the category (1) documents to Petitioner, but Petitioner took issue with the production.

12. In response, the University, through its Records Custodian, specifically and clearly asked Petitioner if he wanted the documents from category (2):

The university did locate public records that contain the search term ‘Hanson,’ which relate to individuals who are not you, but have the same last name. **Do you seek those public records?** (App. 74 (emphasis added)).

13. Petitioner expressly and adamantly rejected such records:

The answer is no - I don’t want all UF communications that contain ‘Hanson.’ My March 26, 2026 request was **not a request** for every record at the University of Florida containing the word ‘Hanson.’ (App. 75 (emphasis added)).

14. This response from Petitioner is important because he admits that category (2) documents (which show his last name but are not related to him) are **not responsive** to his public records request. In other words, the University’s decision to not produce the category (2) records did not violate Chapter 119.

¹ References denoted “App. ____” are references to Petitioner’s *Notice of Filing Appendix A-G to Verified Petition for Writ of Mandamus*. To ease access to these documents, the referenced pages are appended as **Exhibit B** to this motion with quoted language highlighted.

15. As for category (3), the University is not obliged to produce documents that are not considered public records under Chapter 119, and so these documents were not produced in response to Petitioner's request. Taken together, the record shows that the University, acting reasonably and in good faith, gathered and produced the responsive public records requested by Petitioner. *See* § 119.07(1)(c).

The University Has Submitted Competent Substantial Evidence

16. The University has submitted an affidavit from its Director of Public Records (and Records Custodian), John Hines, attesting to these dispositive facts. Mr. Hines' affidavit, based on his own personal knowledge, constitutes competent substantial evidence of the University's compliance with Chapter 119.² *See* Fla. R. Civ. P. 1.510(c)(4) ("An affidavit or declaration used to support or oppose a motion must be made on personal knowledge, set out facts that would be admissible in evidence, and show that the affiant or declarant is competent to testify on the matters stated."); *see also* *Martinez v. Lebron*, 284 So. 3d 1146, 1149 (Fla. 5th DCA 2019) (finding an affidavit to be "[c]ompetent substantial evidence" supporting the trial court's finding).

17. Now that the University has offered unrebutted evidence supporting its position, the burden shifts back to the Petitioner. "In suing an agency for violating Chapter 119, a plaintiff must prove they made a specific request for public records, the agency received it, the requested public records exist, and the agency improperly refused to produce them in a timely manner." *Executive Office of Governor v. Florida Ctr. for Gov't Accountability, Inc.*, 408 So. 3d 839, 844 (Fla. 1st DCA 2025), *reh'g denied* (Apr. 28, 2025) (cleaned up).

² *See* *Affidavit of University of Florida Records Custodian in Support of Response to Verified Petition for Writ of Mandamus*, attached as **Exhibit C**.

Petitioner Has No Competent Evidence to Support His Petition

18. For his part, Petitioner has not, and cannot, offer any evidence of the University's non-compliance beyond his own speculation and inference:

During telephone conversations with Dr. David Cuillier, Dr. Cuillier displayed familiarity with aspects of Petitioner's litigation and objectives that Petitioner had not shared with him, supporting the inference that responsive internal University communications concerning Petitioner exist and have not been produced. (Petition, ¶ 12).

19. Petitioner's inference is not enough. "The competent substantial evidence standard is not satisfied by evidence which merely creates a suspicion or which gives equal support to inconsistent inferences. Surmise, conjecture or speculation have been held not to be substantial evidence." *Callwood v. Callwood*, 221 So. 3d 1198, 1202 (Fla. 4th DCA 2017) (citing *Fla. Rate Conference v. Fla. R.R. & Pub. Utils. Comm'n*, 108 So.2d 601, 607 (Fla. 1959)).

20. Petitioner knows that he cannot allege ultimate facts supporting his claims, so he now seeks to use civil discovery solely to locate facts which might support his inferences. Nonetheless, it is improper for Petitioner "to use discovery as a substitute for requiring allegations of ultimate facts." *Rios v. McDermott, Will & Emery*, 613 So. 2d 544, 545 (Fla. 3d DCA 1993).

21. The topics of Petitioner's discovery requests, such as the University's motives and search techniques, are beyond the scope of the immediate issue and seek to accomplish through litigation what Petitioner has no right to under Chapter 119, such as the creation of a privilege log and sworn certifications. Moreover, Petitioner has raised no viable factual allegation that the University's search for responsive records violates Chapter 119.

Discovery is Not Warranted until the Court Resolves the Threshold Issue

22. For good cause shown, the court may make any order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense that justice requires. *See Fla. R. Civ. P. 1.280(d)*. Here, good cause exists because Petitioner seeks to use discovery to force

the University to shoulder Petitioner’s burden. Because the only issue now before the Court is whether the records produced to Petitioner complied with Chapter 119, Petitioner’s far-reaching discovery requests are abusive and present an undue burden on the University to expend resources.

23. This is especially true where the discovery is a fishing expedition for Petitioner to find support for his speculative inferences. As such, the discovery is unwarranted, irrelevant, and out of proportion to the needs of the case. This includes Petitioner’s interrogatories, requests for admission, notices of deposition, and all but one of his requests to produce.³

24. To assist the Court in resolving the threshold issue of whether the University produced the public records requested by Petitioner, the University has attached as **Exhibit D** the documents falling into categories (1) (pages 1-53), (2) (pages 54-302), and (3) (pages 303-479) that the University gathered using Petitioner’s search criteria.⁴ The inclusion of these documents also effectively responds to the lone discovery request from Petitioner that is relevant to the issue before the Court.⁵

25. The University respectfully requests that the Court examine the attached documents in light of the record before the Court to determine the crucial threshold issue of whether the University responded to Petitioner’s public records request. “If, indeed, the [University] has complied, then **further discovery is obviously unnecessary**[.]” *Morris v. City of Miami*, 402 So. 3d 424, 426 (Fla. 3d DCA 2024) (emphasis added).⁶

³ See *Petitioner’s First Request to Produce to Respondents*—“REQUEST NO. 2. The gathered pages — the over 470 pages UFIT located in response to the Request (Hines Aff. ¶ 6) — or, for any gathered page the University withholds from production, an identification of that page sufficient to permit the Court’s in camera review of it, consistent with the University’s own offer to provide the gathered pages to the Court. (Response p. 3 n.5.)”

⁴ For ease of reference, these records also include Bates designations for each category. The records in category (2) have been redacted pursuant to 20 U.S.C. s. 1232g, as well as § 1006.52, Fla. Stat. (FERPA protected student educational information), and § 119.071(5)(b), Fla. Stat. (bank account information).

⁵ Petitioner’s first request for these documents (i.e., categories (2) and (3)) took place on July 13, 2026.

⁶ The University reserves the right to object to Petitioner’s discovery requests.

WHEREFORE, Respondent respectfully requests that the Court enter a protective order with respect to Petitioner's discovery requests until the Court determines the University's compliance with Chapter 119, and grant any other relief the Court deems proper.

Respectfully submitted,

/s/ James W. Kirkconnell
James W. Kirkconnell, Esq.
Florida Bar No.: 0021044
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PO Box 113125
Gainesville, FL 32611-3125
(352) 392-1358
(352) 392-4387 Facsimile
jameswk@ufl.edu
Attorney for the University of Florida

CERTIFICATE OF CONFERRAL

I HEREBY CERTIFY that prior to filing this motion, I discussed the relief requested in this motion by telephone with the Petitioner on July 24, 2026, and Petitioner disagreed with the relief requested.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the undersigned counsel electronically filed the foregoing using the Florida Courts E-Filing Portal, which will generate a Notice of Electronic Filing to Petitioner at Petitioner's designated email address on this 30th day of July, 2026.

/s/ James W. Kirkconnell
James W. Kirkconnell, Esq.

Exhibit A

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT IN AND FOR ALACHUA COUNTY, FLORIDA

CASE NO.: 01-2026-CA-001794

CHRISTOPHER A. HANSON,
individually and as attorney for
himself and next friend and attorney
for his two minor children,

Petitioners,

v.

UNIVERSITY OF FLORIDA BOARD
OF TRUSTEES, and CUSTODIAN
OF PUBLIC RECORDS, UNIVERSITY
OF FLORIDA,

Respondents.

_____ /

PETITIONER'S FIRST SET OF INTERROGATORIES TO RESPONDENTS

Petitioner, Christopher A. Hanson, pursuant to Florida Rule of Civil Procedure 1.340, propounds the following interrogatories to Respondents, the University of Florida Board of Trustees and the Custodian of Public Records, University of Florida (collectively, the "University"), to be answered separately and fully in writing under oath within thirty (30) days of service.

Definitions

1. **"Request"** means the public-records request assigned tracking number W018463-032626, submitted by Petitioner on or about March 26, 2026, including its Categories A, B, and C as reproduced at page 2 of the University's Response.
2. **"UFIT"** means the University of Florida Information Technology unit referenced in paragraph 6 of the Affidavit of John Hines.
3. **"Gathered pages"** means the over 470 pages of documents UFIT located in response to the Request (Hines Aff. ¶ 6). **"Produced pages"** means the documents delivered to Petitioner on

May 4, 2026. **"Identify,"** as to a person, means state the person's name, title, and role; as to a document or communication, means state its date, author, recipients, and subject.

Instructions

4. Answer each interrogatory separately and fully in writing under oath, or object with specificity, within thirty (30) days of service. Rule 1.340(a). If any answer would change, the University is under a continuing duty to supplement. This action is entitled to statutory priority under Section 119.11(1), Florida Statutes; consistent with that priority and Petitioner's accompanying letter, Petitioner requests expedited answers.

Interrogatories

INTERROGATORY NO. 1. Identify each search term the University or UFIT actually ran in response to the Request. For each term, state: (a) the exact term or query as run; (b) the date it was run; (c) the system, database, or repository against which it was run; (d) the scope searched (including each custodian, mailbox, account, or drive covered); and (e) the number of items or pages it returned. (f) If any term identified in the Request — including any of the six Category B case numbers or the Category C keywords, individuals, and subjects reproduced at page 2 of the Response — was NOT run, identify each such term and state why it was not run.

INTERROGATORY NO. 2. Identify each person who performed the searches described in your answer to Interrogatory No. 1; each person who reviewed or "parse[d] through" the gathered pages (Hines Aff. ¶ 7); and each person who authored, sent, or approved any communication to Petitioner concerning the Request; and state the criteria applied in determining whether each gathered page was produced, withheld as a non-record, or withheld as concerning an unrelated individual.

INTERROGATORY NO. 3. State the total number of pages the University produced to Petitioner in response to the Request and the total number of gathered pages the University did not produce; and for the pages not produced, state the number attributable to each stated ground — (a) not a public record, (b) concerning an individual with the surname "Hanson" unrelated to Petitioner, and (c) any other ground, describing that ground.

INTERROGATORY NO. 4. Describe the form and location in which the UFIT search outputs are maintained, including the file format(s), the system(s) on which they are stored, whether they can be exported, and the identity of the person or unit that maintains them.

INTERROGATORY NO. 5. Identify every repository, system, account, or device within the University's custody or control that was NOT searched in response to the Request but that could contain records responsive to it — including without limitation email accounts, text-message and instant-messaging platforms, shared network drives, cloud storage, and any personal accounts or devices used by University personnel to conduct University business.

INTERROGATORY NO. 6. Identify each person who participated in the decision not to produce the balance of the gathered pages, and for each, state that person's role in the decision.

INTERROGATORY NO. 7. State whether any gathered page has been altered, deleted, moved, overwritten, or become unavailable since it was located in response to the Request; and if so, identify each such page and describe what occurred, when, and by whom.

INTERROGATORY NO. 8. Identify each communication (excluding communications protected by the attorney-client privilege or work-product doctrine, which shall be logged) in which any person determined that a gathered page was not a public record or concerned an unrelated individual, stating the date of each such communication and its participants.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of July, 2026, a true and correct copy of the foregoing was served through the Florida Courts E-Filing Portal and by email on James W. Kirkconnell, Esq., Attorney for the University of Florida, jameswk@ufl.edu, 123 Tigert Hall, PO Box 113125, Gainesville, FL 32611-3125.

/s/ Christopher A. Hanson

Christopher A. Hanson, Esq.

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
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CASE NO.: 01-2026-CA-001794

CHRISTOPHER A. HANSON,
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UNIVERSITY OF FLORIDA BOARD
OF TRUSTEES, and CUSTODIAN
OF PUBLIC RECORDS, UNIVERSITY
OF FLORIDA,

Respondents.

_____ /

PETITIONER'S FIRST REQUESTS FOR ADMISSION TO RESPONDENTS

Petitioner, Christopher A. Hanson, pursuant to Florida Rule of Civil Procedure 1.370, requests that Respondents, the University of Florida Board of Trustees and the Custodian of Public Records, University of Florida (collectively, the "University"), admit or deny the truth of each of the following matters within thirty (30) days of service.

Definitions

1. **"Request"** means the public-records request assigned tracking number W018463-032626, submitted by Petitioner on or about March 26, 2026, including its Categories A, B, and C as reproduced at page 2 of the University's Response to the Verified Petition.
2. **"UFIT"** means the University of Florida Information Technology unit referenced in paragraph 6 of the Affidavit of John Hines.
3. **"Gathered pages"** means the "over 470 pages of documents" the University's custodian swears UFIT located in response to the Request. (Hines Aff. ¶ 6.)

4. **"Produced pages"** means the documents the University delivered to Petitioner on May 4, 2026.

Instructions

5. Each matter is admitted unless, within thirty (30) days after service, the University serves a written answer or objection addressed to the matter, signed by the party or its attorney, as required by Rule 1.370(a). If the University cannot truthfully admit or deny a matter, it must state in detail why it cannot, and a denial must fairly meet the substance of the requested admission, qualifying an answer or admitting part and denying the remainder where a good-faith response so requires. Rule 1.370(a).

6. This action is a public-records mandamus proceeding entitled to statutory priority over other pending matters under Section 119.11(1), Florida Statutes. Consistent with that priority, and as set out in Petitioner's accompanying letter, Petitioner requests expedited responses in advance of the thirty-day period.

Requests for Admission

REQUEST NO. 1. In response to the Request, UFIT gathered over 470 pages of documents.

REQUEST NO. 2. UFIT gathered those pages using terms identified in the Request.

REQUEST NO. 3. The University's May 4, 2026 production to Petitioner consisted of two documents — an attachment of 50 pages and an attachment of 3 pages.

REQUEST NO. 4. The two documents produced on May 4, 2026 together total 53 pages.

REQUEST NO. 5. The University has produced no records to Petitioner in response to the Request beyond those 53 pages.

REQUEST NO. 6. The 53 produced pages consist entirely of correspondence to or from Petitioner.

REQUEST NO. 7. The University has not asserted any statutory exemption under Section 119.07, Florida Statutes, as to any record located in response to the Request.

REQUEST NO. 8. The University has not provided Petitioner an index, log, or count of the gathered pages.

REQUEST NO. 9. The University maintains records of the searches UFIT performed in response to the Request, including the queries run and/or their outputs.

REQUEST NO. 10. The gathered pages that the University did not produce to Petitioner have not been provided to the Court.

Respectfully submitted this 13th day of July, 2026.

/s/ Christopher A. Hanson

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com

727-409-5738

Self-represented Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this ____ day of July, 2026, a true and correct copy of the foregoing was served through the Florida Courts E-Filing Portal and by email on James W. Kirkconnell, Esq., Attorney for the University of Florida, jameswk@ufl.edu, 123 Tigert Hall, PO Box 113125, Gainesville, FL 32611-3125.

/s/ Christopher A. Hanson

Christopher A. Hanson, Esq.

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
IN AND FOR ALACHUA COUNTY, FLORIDA**

CASE NO.: 01-2026-CA-001794

CHRISTOPHER A. HANSON,
individually and as attorney for
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UNIVERSITY OF FLORIDA BOARD
OF TRUSTEES, and CUSTODIAN
OF PUBLIC RECORDS, UNIVERSITY
OF FLORIDA,

Respondents.

_____ /

PETITIONER'S FIRST REQUEST TO PRODUCE TO RESPONDENTS

Petitioner, Christopher A. Hanson, pursuant to Florida Rule of Civil Procedure 1.350, requests that Respondents, the University of Florida Board of Trustees and the Custodian of Public Records, University of Florida (collectively, the "University"), produce for inspection and copying the following items within thirty (30) days of service, at the offices of Petitioner or by electronic delivery in native format.

Definitions

1. **"Request"** means the public-records request assigned tracking number W018463-032626, submitted on or about March 26, 2026, including Categories A, B, and C. **"UFIT"** means the University of Florida Information Technology unit (Hines Aff. ¶ 6). **"Gathered pages"** means the over 470 pages UFIT located in response to the Request. **"Produced pages"** means the documents delivered to Petitioner on May 4, 2026. **"Document"** has the meaning given in Rule 1.350 and includes electronically stored information.

Instructions

2. Produce each item within thirty (30) days of service. Rule 1.350(b). Where a document is withheld on a claim of attorney-client privilege or work-product protection, identify it and the basis of the claim in sufficient detail to permit assessment, as ordinary civil discovery practice under the Florida Rules requires. For clarity: nothing in this request asserts that Chapter 119, Florida Statutes, imposes any duty to create an index or log — the identification provisions here rest on the discovery rules alone. Electronically stored information shall be produced in its native format with metadata intact unless otherwise agreed. This action is entitled to statutory priority under Section 119.11(1), Florida Statutes; consistent with that priority and Petitioner's accompanying letter, Petitioner requests expedited production.

Requests

REQUEST NO. 1. The UFIT search outputs and hit lists generated in response to the Request, produced in native format.

REQUEST NO. 2. The gathered pages — the over 470 pages UFIT located in response to the Request (Hines Aff. ¶ 6) — or, for any gathered page the University withholds from production, an identification of that page sufficient to permit the Court's in camera review of it, consistent with the University's own offer to provide the gathered pages to the Court. (Response p. 3 n.5.)

REQUEST NO. 3. The May 4, 2026 delivery package to Petitioner, including the cover communication and both attachments, as maintained by the University.

REQUEST NO. 4. Documents sufficient to show, in the form kept in the ordinary course, the search terms run in response to the Request, the dates each was run, and the systems or repositories against which each was run.

REQUEST NO. 5. The University's request-processing file for W018463-032626, excluding communications protected by the attorney-client privilege or work-product doctrine (any such withheld communication to be identified on a privilege log).

REQUEST NO. 6. The University's policies, procedures, and guidelines governing the processing of public-records requests, and the records-retention schedules applicable to the categories of records sought by the Request.

REQUEST NO. 7. Documents sufficient to show the capabilities of the search tools UFIT used to respond to the Request, including what fields and repositories can be queried and what outputs can be exported.

REQUEST NO. 8. All communications between the University and UFIT concerning the search for, review of, and decision to produce or withhold records responsive to the Request, excluding

communications protected by the attorney-client privilege or work-product doctrine (any such withheld communication to be identified per Instruction ¶ 2).

Respectfully submitted this 13th day of July, 2026.

/s/ Christopher A. Hanson

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com

727-409-5738

Self-represented Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of July, 2026, a true and correct copy of the foregoing was served through the Florida Courts E-Filing Portal and by email on James W. Kirkconnell, Esq., Attorney for the University of Florida, jameswk@ufl.edu, 123 Tigert Hall, PO Box 113125, Gainesville, FL 32611-3125.

/s/ Christopher A. Hanson

Christopher A. Hanson, Esq.

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
IN AND FOR ALACHUA COUNTY, FLORIDA

CHRISTOPHER A. HANSON,
individually and as attorney for himself and
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UNIVERSITY OF FLORIDA BOARD OF TRUSTEES, and
CUSTODIAN OF PUBLIC RECORDS, UNIVERSITY
OF FLORIDA,
Respondents.

_____ /

NOTICE OF TAKING DEPOSITION (VIA ZOOM VIDEOCONFERENCE)

PLEASE TAKE NOTICE that Petitioner, Christopher A. Hanson, will take the deposition upon oral examination of the following witness, before an officer authorized by law to administer oaths, at the date and time stated below, and continuing from day to day until completed:

Deponent: John Hines, Director of Public Records and records custodian for the University of Florida, and the affiant whose sworn affidavit was filed in support of Respondents' Response to the Order to Show Cause.

Date and time: Monday, August 3, 2026, at 3:00 p.m. (Eastern Time).

Method: The deposition will be taken by remote electronic means (Zoom videoconference) pursuant to Florida Rule of Civil Procedure 1.310(b)(4). The witness, the officer, and the participants may appear by remote videoconference, and the officer is authorized to administer the oath remotely. The Zoom connection details are set forth below.

Officer / court reporter: Vincent Lucente (vincentlucente.com), a notary public or other officer authorized by law to administer oaths. The testimony will be recorded stenographically and by simultaneous audiovisual means via the Zoom videoconference platform.

Zoom connection (the same meeting is used for both the 1:00 p.m. and 3:00 p.m. depositions):

Join Zoom Meeting:

[REDACTED]

[REDACTED]

[REDACTED]

One tap mobile: +1 786 635 1003 (US — Miami); +1 312 626 6799 (US — Chicago); [REDACTED]

[REDACTED]

Join by SIP: [REDACTED]

The deposition is being taken for purposes of discovery, for use at any hearing or trial in this action, and for all other purposes permitted under the Florida Rules of Civil Procedure. As the University's Director of Public Records, records custodian, and affiant in this proceeding, Mr. Hines is a managing agent of Respondent University of Florida Board of Trustees, and his attendance is required upon service of this Notice on Respondents' counsel without the necessity of a subpoena.

If the deposition is not completed on the date noticed, it will be continued from day to day thereafter until completed.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by email this 24th day of July, 2026, on James W. Kirkconnell, Esq. (jameswk@ufl.edu) and Kimberly LoGiurato, Esq. (klogiurato@ufl.edu), UF Office of General Counsel, counsel for Respondents.

Respectfully submitted,

s\Christopher Hanson

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
IN AND FOR ALACHUA COUNTY, FLORIDA

CHRISTOPHER A. HANSON,
individually and as attorney for himself and
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Case No.: 01-2026-CA-001794

UNIVERSITY OF FLORIDA BOARD OF TRUSTEES, and
CUSTODIAN OF PUBLIC RECORDS, UNIVERSITY
OF FLORIDA,
Respondents.

**NOTICE OF TAKING DEPOSITION OF NON-PARTY WITNESS (VIA ZOOM
VIDEOCONFERENCE)**

PLEASE TAKE NOTICE that Petitioner, Christopher A. Hanson, will take the deposition upon oral examination of the following non-party witness, before an officer authorized by law to administer oaths, at the date and time stated below, and continuing from day to day until completed:

Deponent: Professor Jane Bambauer, Professor of Law and Brechner Eminent Scholar at the University of Florida (Fredric G. Levin College of Law and College of Journalism and Communications), who, according to the sworn affidavit filed in support of Respondents' Response to the Order to Show Cause, provided records to the University's Director of Public Records in response to the search of public-records request No. W018463-032626.

Date and time: Monday, August 3, 2026, at 1:00 p.m. (Eastern Time).

Method: The deposition will be taken by remote electronic means (Zoom videoconference) pursuant to Florida Rule of Civil Procedure 1.310(b)(4). The Zoom connection details are set forth below.

Officer / court reporter: Vincent Lucente (vincentlucente.com), a notary public or other officer authorized by law to administer oaths. The testimony will be recorded stenographically and by simultaneous audiovisual means via the Zoom videoconference platform.

Zoom connection (the same meeting is used for both the 1:00 p.m. and 3:00 p.m. depositions):

Join Zoom Meeting:

[REDACTED]

[REDACTED] [REDACTED]

One tap mobile: +1 786 635 1003 (US — Miami); +1 312 626 6799 (US — Chicago); [REDACTED]
[REDACTED]

Join by SIP: [REDACTED]

The attendance of the witness is compelled by a subpoena issued under Florida Rule of Civil Procedure 1.410 and served herewith. The deposition is being taken for purposes of discovery, for use at any hearing or trial in this action, and for all other purposes permitted under the Florida Rules of Civil Procedure.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by email this 24th day of July, 2026, on James W. Kirkconnell, Esq. (jameswk@ufl.edu) and Kimberly LoGiurato, Esq. (klogiurato@ufl.edu), UF Office of General Counsel, counsel for Respondents.

Respectfully submitted,

S\Christopher Hanson

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner

SUBPOENA FOR DEPOSITION (VIA ZOOM VIDEOCONFERENCE)

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT

IN AND FOR ALACHUA COUNTY, FLORIDA

CHRISTOPHER A. HANSON,
individually and as attorney for himself and
next friend and attorney for his two minor children,
Petitioners,

v.

Case No.: 01-2026-CA-001794

UNIVERSITY OF FLORIDA BOARD OF TRUSTEES, and
CUSTODIAN OF PUBLIC RECORDS, UNIVERSITY
OF FLORIDA,
Respondents.

THE STATE OF FLORIDA:

TO: Professor Jane Bambauer, Professor of Law and Brechner Eminent Scholar
University of Florida, Fredric G. Levin College of Law
309 Village Drive, Gainesville, FL 32611

YOU ARE COMMANDED to appear for the taking of your deposition upon oral examination, by remote electronic means (Zoom videoconference), on Monday, August 3, 2026, at 1:00 p.m. (Eastern Time), and continuing from day to day until completed, before an officer authorized by law to administer oaths, to testify in the above-styled action. The deposition will be conducted by remote videoconference pursuant to Florida Rule of Civil Procedure 1.310(b)(4); you may appear by remote videoconference, and the officer is authorized to administer the oath remotely. The Zoom connection details are set forth below.

Zoom connection (the same meeting is used for both the 1:00 p.m. and 3:00 p.m. depositions):

Join Zoom Meeting:



[REDACTED] [REDACTED]
One tap mobile: +1 786 635 1003 (US — Miami); +1 312 626 6799 (US — Chicago); [REDACTED]
[REDACTED]

Join by SIP: [REDACTED]

The subject of the deposition concerns your handling of, and communications relating to, University of Florida public-records request No. W018463-032626, including the records you provided to the University's Director of Public Records in response to the search of that request, as described in the sworn affidavit filed in this action.

WITNESS FEE: Witness fees and mileage as provided by section 92.142, Florida Statutes, are tendered or will be tendered at the time of service as required by law.

NOTICE: This is a subpoena for your appearance at a deposition, issued pursuant to Florida Rule of Civil Procedure 1.410. If you fail to appear in response to this subpoena, you may be held in contempt of court. If you object to this subpoena, or seek to limit or modify it, you must file and serve a written objection or a motion for protective order before the date and time of the scheduled appearance; the Court will resolve any such objection at or before that time. You are subpoenaed to appear by the following self-represented litigant, who is also a member of The Florida Bar, and unless excused from this subpoena by that litigant or by the Court, you shall respond to this subpoena as directed.

AMERICANS WITH DISABILITIES ACT (ADA) NOTICE: If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact the ADA Coordinator, Court Administration, Eighth Judicial Circuit, before the proceeding.

DATED this 24th day of July, 2026.

s\Christopher Hanson

Christopher A. Hanson, Esq.

Florida Bar No. 44094

Attorney of record issuing this subpoena

(self-represented Petitioner, member of The Florida Bar)

cahanson77@yahoo.com · 727-409-5738

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this subpoena and the accompanying Notice of Taking Deposition was served on Respondents' counsel, James W. Kirkconnell, Esq. (jameswk@ufl.edu) and Kimberly LoGiurato, Esq. (klogiurato@ufl.edu), by email this 24th day of July, 2026, and that the subpoena will be served upon the witness by a person authorized by law to serve process, or as otherwise accepted by counsel.

Christopher A. Hanson, Esq.

Exhibit B

Subject: Formal Public Records Request: UF College of Journalism / Brechner Freedom of Information Project

Dear Custodian of Public Records for the University of Florida:

Pursuant to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution, I am requesting access to inspect and copy public records related to myself and ongoing litigation for which I sought help from the Brechner Institute.

This request is specifically directed at records maintained by, sent to, or received by employees within the UF College of Journalism and Communications, specifically including but not limited to the Brechner Freedom of Information Project, Dr. David Cuillier, and Professor Jane Bambauer.

I. TIME FRAME Please search for records created, sent, or received between December 1, 2024, and the date this request is fulfilled.

II. SCOPE OF RECORDS REQUESTED Please produce all written communications, including but not limited to emails, text messages, Signal/WhatsApp messages, internal memoranda, notes, and draft research or survey data, that contain any of the following names, email addresses, case numbers, or keywords:

- **A. Names and Contact Information:** "Christopher Hanson", "Chris Hanson", "cahanson77@yahoo.com", "Hanson"
- **B. Specific Case Numbers:** "25-CA-10255", "24-DR-001150", "2025-CA-002469", "2D2025-1936", "2D2025-0681", "2D2026-0279"
- **C. Targeted Keywords, Individuals & Subjects:** "13th Circuit", "Scott Davis", "Judge Kelly Ayers", "Judge Matthew Felix", "Gina Justice", "Vivian Hodz", "Judge Sherwood Coleman", "Grace Samarkos", "Florida Bar Mandamus", "surveillance video", "insider protectionism"

III. FORMAT AND PRESERVATION

- **Catch-All & Personal Devices:** This request explicitly covers records stored on personal devices (phones, tablets, computers) or private email accounts if they were used by UF employees to conduct official university business, research, or correspondence regarding the above topics.
- **Format:** Please produce all records electronically in their native format or as PDFs.
- **Exemptions & Privilege Log:** If you claim that any record (or portion thereof) is exempt from public disclosure under Chapter 119 or FERPA, you must state the

basis for the exemption in writing, citing the specific statutory exemption. For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter.

I request a rolling production of records as they become available. If you anticipate that this request will trigger a special service charge under §119.07(4)(d), F.S., please provide a written, itemized estimate prior to incurring any costs.

Please acknowledge receipt of this request and provide an estimated timeline for production.

Sincerely,

Chris Hanson

Christopher A. Hanson, Esq.

FL Bar #44094

727-409-5738

cahanson77@yahoo.com

Re: Public Records Request :: W018463-032626

From: cahanson77@yahoo.com (cahanson77@yahoo.com)

To: universityofflorida@mycusthelp.net; cuillierd@ufl.edu; nruthoverchaos@outlook.com

Date: Friday, May 8, 2026 at 02:05 PM EDT

To Whom It May Concern at the University of Florida Public Records Request Center:

As a preliminary matter, I previously asked that the University respond within this email chain rather than initiating separate, disconnected emails, so that the full record of correspondence would remain in one place and so that each side's communications would be clear. That request has been ignored. Your most recent email, like the one before it, was sent as a stand-alone message, unsigned, with no individual name, title, or direct contact information attached to it.

It's counter-productive to respond in that manner. Here is your email copied here:

"To: me · Fri, May 8 at 1:07 PM

Message Body

--- Please respond above this line ---

Dear Chris Hanson,

The university did locate public records that contain the search term "Hanson," which relate to individuals who are not you, but have the same last name. Do you seek those public records?

Sincerely,

University of Florida Public Records Request Center"

I raise this not as a stylistic complaint but because it is part of a larger and increasingly concerning pattern. The University has now responded to my correspondence three times without identifying any human being responsible for the positions it is taking. No custodian has been named. No designee has been named. No author of any of the University's responses has been named.

Even the simple courtesy of replying within an existing email thread — something that costs the University nothing — has been declined. It is fair to ask why, when the University is asserting legal positions of its own choosing under Chapter 119, it has been unwilling at any point to put a name to those positions. The Public Records Law is built on the premise that public business is the public's business, and that includes knowing which public employee is making the decisions about what will and will not be produced. The Brechner Center's Mission is precisely in line with that Citizen expectation. What is going on here??

Turning to the substance of your most recent email, you ask whether I want public records that contain the search term "Hanson" but "relate to individuals who are not [me]." The answer is no - I don't want all UF communications that contain "Hanson." My March 26, 2026 request was not a request for every record at the University of Florida containing the word "Hanson." It was a structured request defining three specific categories: (A) my own name and personal information; (B) enumerated case numbers tied to my pending litigation; and (C) a targeted list of keywords, individuals, and subjects connected to those cases. I am seeking records responsive to those categories. I am not seeking records about unrelated third parties who happen to share my surname.

Regardless, your latest correspondence further compounds the deficiencies I identified in my May 4, 2026 letter:

First, your email states that the University "did locate public records that contain the search term 'Hanson,' which relate to individuals who are not you." This is the first written confirmation from the University that records were located, reviewed, and then filtered out of the production based on the University's own subjective determination of whether those records "relate to" me.

There is no exemption under Chapter 119, Florida Statutes, or Article I, Section 24 of the Florida Constitution that authorizes a public agency to withhold non-exempt records based on the agency's internal judgment of relevance nor "relation." If the University believes such authority exists, please identify the specific statutory basis in writing.

Otherwise, please confirm whether the University has any records responsive to my public records request even if the University finds that they "relate" to someone else. This must include Internal University communications, memoranda, notes, or drafts referencing the case numbers, individuals, or keywords I identified and produce a privilege log identifying each such record.

Second, as set forth above, the University has now responded to my correspondence three times without identifying, by name, the individual or legal designee processing this request. My request, my April 24 and April 30 follow-ups, and my May 4 deficiency letter have each specifically asked for the name, title, direct email, and phone number of the individual handling this matter. To date, no such information has been provided. Pointing me to a generic webpage is not a substitute for identifying the person responsible for the response. Please provide that information immediately.

Third, the remaining deficiencies identified in my May 4, 2026 letter remain unaddressed: (i) no written certification of a complete and diligent search, identifying the custodians and locations searched, including personal devices and private email accounts used for University business; (ii) no privilege log identifying records withheld or redacted and the specific statutory exemption claimed for each; and (iii) no production of internal University communications, memoranda, notes, or drafts responsive to the categories defined in the request.

Fourth, please be advised that none of the University's recent correspondence — including the May 4 production of my own emails back to me, the subsequent unsigned email asserting general compliance, or the most recent inquiry about unrelated third parties — operates to pause, reset, or satisfy my public records request and the five business days' written notice provided pursuant to Section 119.12(1)(b), Florida Statutes, in my May 4, 2026 letter. That notice period continues to run, and the deadline for full statutory compliance remains the close of business on Monday, May 11, 2026.

I continue to prefer an amicable resolution and remain willing to speak directly with the designated custodian once the University identifies that individual. Absent meaningful compliance by the deadline, I will treat the University's correspondence to date as a constructive denial and unlawful refusal to produce public records, and will proceed with

filing a Petition for Writ of Mandamus in the appropriate circuit court, seeking all applicable attorney's fees and costs pursuant to Sections 119.11 and 119.12, Florida Statutes.

I'm not trying to unnecessarily embarrass anyone with the records. They are critical to some legal work I'm doing. If the University will simply cooperate, I'm willing to discuss terms that might allow any sensitive or embarrassing communications to avoid publicity. My goal remain a fair result in the underlying proceedings and I believe the materials that UF are critical to that.

Thank you for your prompt attention to these matters.

Sincerely,

Christopher A. Hanson, Esq.
FL Bar #44094
727-409-5738
cahanson77@yahoo.com

On Wednesday, May 6, 2026 at 04:31:29 PM EDT, cahanson77@yahoo.com <cahanson77@yahoo.com> wrote:

Good afternoon. I recently received yet another nameless, faceless email trying to avoid compliance with Chapter 119. I continue to have the questions that I outline in the chain below.

Here is the email cut and paste from the one I received yesterday:

"Dear Chris Hanson,

The university is in receipt of the questions regarding your public records request. Please note, the university complies fully with Florida's public records laws. Records custodian information is prominently identified on UF's Public Records Center website, linked here. The university conducted a good faith search for any public records responsive to your request, including reaching out to the employees you identified and to UF IT to conduct email searches. In accordance with the law and normal UF process, all located records incurred a legal review in order to determine responsiveness and the potential exempt nature of information in the records. No exempt information was withheld or redacted from the records responsive to your request, and consequently, no statutory exemptions were cited in UF's response.

We hope this explanation is helpful.

Sincerely,
University of Florida Public Records Request Center"

Your email on its face fails to comply with Chapter 119. It will make it easier moving forward if you simply respond to this email chain so it's clear what each of us is communicating. You have not complied with the Chapter 119 requirements that I describe below. Please respond with appropriate information including the individual(s) responsible for any certifications.

Exhibit C

Exhibit A

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT IN AND FOR ALACHUA, COUNTY, FLORIDA

CHRISTOPHER A. HANSON,
individually and as attorney for
himself and next friend and attorney
for his two minor children,
Petitioners,

v.

Case No.: 01-2026-CA-001794

UNIVERSITY OF FLORIDA BOARD
OF TRUSTEES, and CUSTODIAN
OF PUBLIC RECORDS, UNIVERSITY
OF FLORIDA,

Respondents.

AFFIDAVIT OF UNIVERSITY OF FLORIDA RECORDS CUSTODIAN IN SUPPORT OF RESPONSE TO VERIFIED PETITION FOR WRIT OF MANDAMUS

STATE OF FLORIDA
COUNTY OF ALACHUA

I, John Hines, do affirm and state as follows:

1. My name is John Hines. I am at least eighteen (18) years old and I am a resident of Alachua County, Florida. I have personal knowledge of all facts stated herein and affirm that they are true and correct to the best of my knowledge.
2. I am Director of Public Records for the University of Florida (“University”), and I am the records custodian for the University. I am responsible for the operational management and administrative direction of the University’s public records functions and services.
3. The University prominently displays my role as records custodian on its public records website, which can be found at <http://publicrecords.ufl.edu/>.

Exhibit A

4. On March 26, 2026, the University received Petitioner Christopher Hanson's public records request. The request was entered into the public records request portal and an acknowledgement and reference number (W018463-032626) were sent to the Petitioner.
5. On March 30, 2026, I sent the search parameters of Petitioner's request to the University's IT department ("UFIT"), as well as to faculty members Dr. David Cuillier and Professor Jane Bambauer.
6. I began the process of collecting documents in response to Petitioner's request, including any and all records meeting Petitioner's search criteria. Dr. Cuillier and Dr. Bambauer sent me records that consisted of email correspondence with Petitioner. UFIT, using the terms identified in Petitioner's request, gathered over 470 pages of documents, including Petitioner's correspondence with UF faculty.
7. I worked with UFIT and UF's legal department to parse through the 470+ pages. Of these, some records did not meet the definition of public records, while others concerned individuals having the surname Hanson, but with no relation to the Petitioner.
8. On May 4, 2026, I delivered the responsive public records to Petitioner.

FURTHER AFFIANT SAYETH NAUGHT.

Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

/s/ John Hines
John Hines