

COMPOSITE EXHIBIT 1

to Petitioners' Combined Response in Opposition and Cross-Motion

Case No. 01-2026-CA-001794

Part	Description	Pages	Count
A	Email to Kirkconnell - discovery requests + public records request (as sent 7/13/26)	2-4	3
B	Email from Kirkconnell - scheduling + no position on relief sought (received 7/14/26)	5-7	3
C	Case Management Conference scheduling thread, Hall + Kirkconnell (as sent/received 7/15/26)	8-13	6
D	Email to Kirkconnell memorializing telephone call (as sent 7/16/26)	14-19	6
E	Email to Kirkconnell re: PRR W018964 + conferral (as sent 7/18/26)	20-30	11
F	Deposition notice service + Hall reply (as sent/received 7/24/26 - 7/27/26)	31-38	8
G	UF production W018964-060526: Hines email, "The person did not ask for attachments" (PRR production, p. 2)	39-40	2
H	UF production W018964-060526: 5/4/26 10:40 AM email, search tool "stalled before completing" (PRR production, p. 119)	41-42	2
I	UF production W018964-060526: keyword charts showing "Hanson - 113 - 98.26%" and "No attachments were included" (PRR production, pp. 50, 222)	43-45	3
J	UF Motion for Protective Order, Exhibit D: category-stamp boundary pages, Category 1 to Category 2 and Category 2 to Category 3 (Doc. 006, pp. 84-85, 431-432)	46-50	5
K	UF Motion for Protective Order, Exhibit D: unstamped text-message screenshot page (Doc. 006, p. 333)	51-52	2

PART A

Email to Kirkconnell - discovery requests + public records request (as sent
7/13/26)



Chris Hanson <christophhanson77@gmail.com>

RE: *Hanson v. University of Florida Board of Trustees, et al.*, No. 01-2026-CA-001794 (Fla. 8th Cir.)

cahanson77@yahoo.com <cahanson77@yahoo.com>

Mon, Jul 13, 2026 at 1:57 PM

To: chris hanson <christophhanson77@gmail.com>, "universityofflorida@mycusthelp.net" <universityofflorida@mycusthelp.net>, "jameswk@ufl.edu" <jameswk@ufl.edu>

Dear Mr. Kirkconnell:

I am drafting the Reply to the University's Response to the Order to Show Cause. I may need an extra 5–7 days to finish the reply. Do you have any objection to an extension of 7 days?

Additionally, efficiency is my primary objective here. I have encountered enormous, unnecessary obstacles and delays in the courts over the past two years. What I am requesting from UF is simple. I write separately to give the University the opportunity to resolve the core of this case without further judicial time.

1. Demand for production. Mr. Hines has sworn that UFIT "gathered over 470 pages of documents, including Petitioner's correspondence with UF faculty." (Hines Aff. ¶ 6.) The University produced 53 pages — its correspondence directly with me — and nothing else, explaining the difference only as records that "did not meet the definition of public records" or "concerned individuals having the surname Hanson, but with no relation to the Petitioner." (Hines Aff. ¶ 7.)

The University judged my own letters responsive and produced additional copies back to me; and everything I did not already possess, it withheld. On behalf of Petitioners, I ask that the University produce the remainder of the located pages now. If the University maintains that any located page is exempt, is not a public record, or is not responsive, please identify each such page and state the basis with particularity — whichever of those grounds applies — consistent with the burden the University's own cited authority places on the party resisting production. A response within five (5) business days would allow the parties to narrow the issues before the Court takes them up.

To be clear, the correspondence the University returned to me is not what this case is about. The matters requiring attention are the records I do not have — including the case-number and keyword material the University's filings have not yet addressed. Those issues are framed in the enclosed discovery rather than argued in this letter. I am including the contact for the records custodian department due to the additional public records request attached here to

2. Discovery. Served with this letter are Petitioner's First Requests for Admission, First Set of Interrogatories, and First Request to Produce, each directed to the facts the University itself put in issue through the Hines affidavit: what was searched, what was found, what was withheld, and on what stated basis. Given the statutory priority of this action under Section 119.11(1), Florida Statutes, Petitioner requests that the University respond on an expedited basis; if the University believes discovery in this proceeding requires leave of court or a different schedule, please say so promptly and Petitioner will take the question to the Court rather than let it lie.

3. Depositions. Please provide, within seven (7) days, available deposition dates within the next thirty (30) days for each of the following:

(a) **John Hines**, whose affidavit the University has placed at the center of its Response, and who swears he personally "delivered the responsive public records to Petitioner" on May 4, 2026

(Aff. ¶ 8) — a delivery made by an email that, like every University communication concerning the Request, identified no individual by name or title;

(b) **A University designee under Rule 1.310(b)(6)** with knowledge of the handling of Request No. W018463-032626 — including the identity and role of each person who authored, reviewed, or approved the University's communications to me of March 26, April 23, May 4, and May 8, 2026, each sent unsigned from the University's records-portal mailbox notwithstanding my express, repeated requests that the responsible individual be identified; the searches actually run; and the disposition of the gathered pages; and

(c) **Mr. David Cuillier**, whose correspondence with me constitutes the entirety of the University's production and whose records bear directly on the adequacy of the University's search.

Petitioner offers to coordinate scheduling cooperatively; if the parties are unable to coordinate, Petitioner will raise scheduling with the Court at the Section 119.11(1) hearing. If the University contends that any deposition in this proceeding requires leave of court, please say so promptly.

4. Preservation. Demand is renewed that the University preserve, and direct UFIT and all personnel to preserve: the 470+ pages gathered; all UFIT search outputs, hit lists, queries, and logs associated with request W018463-032626; the May 4, 2026 delivery package; and all records concerning the handling of the request — on every system and backup where they reside, with associated metadata, and with any automatic deletion or overwriting suspended.

This correspondence is written to resolve issues, not multiply them. If the University will produce the located records or lodge them with the Court per its own footnoted offer, much of what follows becomes unnecessary. I look forward to your prompt response.

Respectfully,

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner

4 attachments

 **PRR 2 TO UF.pdf**
100K

 **Rogs to UF.pdf**
102K

 **RFAS to UF.pdf**
124K

 **RTP to UF.pdf**
123K

PART B

Email from Kirkconnell - scheduling + no position on relief sought (received
7/14/26)

RE: *Hanson v. University of Florida Board of Trustees, et al.*, No. 01-2026-CA-001794 (Fla. 8th Cir.)

From: Kirkconnell,James W (jameswk@ufl.edu)
To: cahanson77@yahoo.com
Cc: klogiurato@ufl.edu
Date: Tuesday, July 14, 2026 at 08:35 AM EDT

Hi Mr. Hanson,

Thank you for your email. Rule 1.630 does not contemplate a reply to a response, so for that reason UF does not take a position on your request for an extension.

My legal assistant will be contacting Judge Keim's office this morning about scheduling a hearing pursuant to FS § 119.11(1) and/or an *in camera* review. Once we hear from the judge we can coordinate a hearing time. At that point the parties can address your discovery requests if necessary.

Lastly, the public records request contained in your email has been forwarded to Mr. Hines and will be processed in due course.

Thanks,
Jim

Jim Kirkconnell
Assistant Counsel
UF Office of General Counsel
(352) 392-1358

From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Sent: Monday, July 13, 2026 1:57 PM
To: chris hanson <christophhanson77@gmail.com>; universityofflorida@mycusthelp.net; Kirkconnell,James W <jameswk@ufl.edu>
Subject: RE: *Hanson v. University of Florida Board of Trustees, et al.*, No. 01-2026-CA-001794 (Fla. 8th Cir.)

[External Email]

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Additionally, efficiency is my primary objective here. I have encountered enormous, unnecessary obstacles and delays in the courts over the past two years. What I am requesting from UF is simple. I write separately to give the University the opportunity to resolve the core of this case without further judicial time.

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This correspondence is written to resolve issues, not multiply them. If the University will produce the located records or lodge them with the Court per its own footnoted offer, much of what follows becomes unnecessary. I look forward to your prompt response.

Respectfully,

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner

PART C

Case Management Conference scheduling thread, Hall + Kirkconnell (as sent/received 7/15/26)



Chris Hanson <christophhanson77@gmail.com>

Re: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

Theresa Hall <hallt@circuit8.org>

Thu, Jul 16, 2026 at 7:23 AM

To: "Kirkconnell,James W" <jameswk@ufl.edu>, "cahanson77@yahoo.com" <cahanson77@yahoo.com>,
"LoGiurato,Kimberly" <klogiurato@ufl.edu>

Cc: "christophhanson77@gmail.com" <christophhanson77@gmail.com>

I have this on the calendar and I will present an order to Judge Keim to set the case management conference.

Thank you and have a great day.

Theresa J. Hall, Judicial Assistant to

Honorable Donna M. Keim

Family and Civil Justice Center

[201 E University Avenue, Room 416](#)

Gainesville, Florida 32601

(352) 374-3646

Gilchrist County Courthouse

112 South Main Street Trenton, FL 32693-3200

(352) 374-3646

Union County Courthouse

55 West Main Street Lake Butler, Florida 32054-1600

(352) 374-3646

Divisional Instructions for Div. CA1 <https://circuit8.org/wp-content/uploads/Alachua-County-Circuit-Civil-Division-J-Civil-Policies-and-Procedures.pdf>

PLEASE BE ADVISED THAT THE CLERK OF COURT OFTEN DOES NOT DOCKET PLEADINGS UNTIL 3-8 DAYS AFTER THEY ARE FILED. PLEASE INCLUDE A COPY OF ANY RELEVANT PLEADINGS WHEN YOU EMAIL THE COURT TO REQUEST A HEARING OR ENTRY OF AN ORDER.

Please be advised that Canon 3(B)(7) of the Code of Judicial Conduct prohibits a judge from considering ex parte communications or other communications made to a judge outside the presence of the parties concerning a pending or impending matter.

From: Kirkconnell,James W <jameswk@ufl.edu>**Sent:** Wednesday, July 15, 2026 4:07 PM**To:** Theresa Hall <hallt@circuit8.org>; cahanson77@yahoo.com <cahanson77@yahoo.com>;

LoGiurato,Kimberly <klogiurato@ufl.edu>

Cc: christophhanson77@gmail.com <christophhanson77@gmail.com>**Subject:** RE: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

Hi Ms. Hall,

I am available for any of those times. Please let me know which slot the Court prefers, and our office can file a notice of hearing.

Thanks,

Jim

Jim Kirkconnell

Assistant Counsel

UF Office of General Counsel

(352) 392-1358

From: Theresa Hall <hallt@circuit8.org>

Sent: Wednesday, July 15, 2026 11:52 AM

To: cahanson77@yahoo.com; LoGiurato,Kimberly <klogiurato@ufl.edu>

Cc: Kirkconnell,James W <jameswk@ufl.edu>; christophhanson77@gmail.com

Subject: RE: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

[External Email]

If Mr. Kirkconnell is available I will set a case management conference for 30 minutes on any of the dates he is available as long as it is still open.

Thank you and have a great day.

Theresa J. Hall, Judicial Assistant to

Honorable Donna M. Keim

Family and Civil Justice Center

201 E University Avenue, Room 416

Gainesville, Florida 32601

(352) 374-3646

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From: cahanson77@yahoo.com <cahanson77@yahoo.com>

Sent: Wednesday, July 15, 2026 11:40 AM

To: LoGiurato, Kimberly <klogiurato@ufl.edu>; Theresa Hall <hallt@circuit8.org>

Cc: Kirkconnell, James W <jameswk@ufl.edu>; christophhanson77@gmail.com

Subject: Re: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

Hi Ms. Hall. How long and for what type of hearing are these blocks for?

The only thing that we may need now is a case management conference - probably 30 minutes and preferably by zoom if acceptable to Judge Keim.

I'm hoping to hear back from Mr. Kirkconnell on what we can agree on.

If these slots are for the 30 minute case management conference, I will make any of the 3 work and would request that we get that on the calendar now so we don't lose the dates. If we resolve all of the outstanding disputes and procedures, we can cancel immediately.

Please let me know if you need anything else from me. Thank you for your prompt attention on this.

Chris Hanson

FL Bar #44094

727-409-5738

On Wednesday, July 15, 2026 at 11:11:18 AM EDT, Theresa Hall <hallt@circuit8.org> wrote:

Good morning:

Are the parties requesting a hearing at this time or are you working on the issues without court intervention? If you are requesting a hearing my first available times are as follows:

8/24 at 11:00

8/24 at 1:30

8/26 at 2:15

Thank you and have a great day.

Theresa J. Hall, Judicial Assistant to

Honorable Donna M. Keim

Family and Civil Justice Center

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Gainesville, Florida 32601

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Please be advised that Canon 3(B)(7) of the Code of Judicial Conduct prohibits a judge from considering ex parte communications or other communications made to a judge outside the presence of the parties concerning a pending or impending matter.

From: cahanson77@yahoo.com <cahanson77@yahoo.com>

Sent: Tuesday, July 14, 2026 1:36 PM

To: Theresa Hall <hallt@circuit8.org>; LoGiurato, Kimberly <klogiurato@ufl.edu>

Cc: Kirkconnell, James W <jameswk@ufl.edu>

Subject: Re: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

Good afternoon, the court's order allowed for the attached pleading in response to respondents, July 7th, 2026 filing. Both of the documents were filed timely. My reply references some discovery matters necessary before a final evidentiary hearing would be productive. I agree that production of the 470 plus documents is necessary at this time; but see no basis for it occurring "in camera." An in camera inspection would be proper to evaluate any exemptions at issue, but no exemption is pled. There is a conclusory request for an in camera inspection with no basis to support it. The procedure is simple production.

Mr. Kirkconnell - perhaps you can and I can discuss by phone or email what we can resolve ourselves and what requires a hearing? I'm hoping this can go as efficiently as possible for all involved.

I can be available this afternoon or tomorrow for a call or please send me an email with what issues I raise in the attached reply we can resolve amicably, if you prefer communicating in email. Thank you for your cooperation.

Chris Hanson
FL bar #44094
727-409-5738

On Tuesday, July 14, 2026 at 08:51:46 AM EDT, LoGiurato, Kimberly <klogiurato@ufl.edu> wrote:

Good morning, Ms. Hall

Please let us know if the Court would like the parties to schedule a hearing on this matter pursuant to FS s. 119.11(1) and/or an *in camera* review of the documents in question.

Thank you,



Kimberly LoGiurato
Legal Assistant II
Office of the Vice President and General Counsel
University of Florida
klogiurato@ufl.edu
352-294-1909

CONFIDENTIAL INFORMATION: The information contained in this electronic message and any attachments to it are intended for the exclusive use of all addressees and may contain confidential attorney-client communication and/or other confidential information. If you are not the intended recipient, please destroy all copies of this message and attachments and immediately notify this office by sending a reply e-mail to the sender. Thank you.

PART D

Email to Kirkconnell memorializing telephone call (as sent 7/16/26)



Chris Hanson <christophhanson77@gmail.com>

Memorializing Call / Discovery Objections and Upcoming Timelines - Hanson v. UF, No. 01-2026-CA-001794

cahanson77@yahoo.com <cahanson77@yahoo.com>

Thu, Jul 16, 2026 at 2:31 PM

To: "Kirkconnell, James W" <jameswk@ufl.edu>

Cc: "LoGiurato, Kimberly" <klogiurato@ufl.edu>, chris hanson <christophhanson77@gmail.com>

Mr. Kirkconnell,

I write to memorialize our telephone conversation yesterday and to set out, in one place, where the production, preservation, and discovery issues stand following that call. If your recollection of any of the points below differs from mine, please tell me promptly in writing.

The "personal records" question, production, and in camera review. On our call, you indicated that the University may treat some of the located records as "personal" in nature and outside public-records consideration. I want to be clear about my position on that. I'm requesting all records identified including any that may appear personal – to be identified and produced. Florida law begins from a constitutional presumption of access to public records (Art. I, § 24, Fla. Const.; § 119.01, Fla. Stat.). Whether any particular located page falls outside Chapter 119 as genuinely personal is a question ultimately decided by the Court.

If the University intends to withhold any page(s) of the documents identified in relation to my request, from Court consideration, please let me and the Court know so that we can have a formal determination on that.

The University's sworn affidavit does not describe any located record as "personal": it states only that "some records did not meet the definition of public records," and that others "concerned individuals having the surname Hanson, but with no relation to the Petitioner" (Hines Aff. ¶17). I assume those are the "personal" records you mentioned yesterday?

Whatever ground the University relies on, it should be stated page by page. Accordingly, I ask that the University either (i) the full set of located pages, or (ii) provide a page-by-page log stating the basis for withholding each page.

During our call, you also confirmed that UFIT located 478 pages in its search. I want the record clear on that figure, because Mr. Hines's affidavit disclosed only the approximation that UFIT "gathered over 470 pages of documents, including Petitioner's correspondence with UF faculty" (Hines Aff. ¶16), rather than the exact count. The University produced 53 pages — my own correspondence with UF faculty, which I already had — leaving 425 located pages that have not been produced. I intend to develop the basis for that cull, and for the search itself, through my pending workflow records request (PRR2, Ref. W019186-071326), which seeks the search queries, hit lists, audit logs, system metadata, and the complete portal/GovQA trail for the W018463-032626 search, including all attachments.

Given the delays in this process, and the University's evolving explanations — the unexplained legal process delay, no information at first production about the records the University withheld, and only piecemeal detail since — I would appreciate some clarification about the 478 figure and how the located pages break down.

This should not have to wait for the more recent requests to work their way through. So that the parties can narrow these issues before involving the Court, please address the following:

1. Is 478 the total number of pages the search identified — including both the pages the University considers public records and those it considers non-public?
2. Please state that total as its two subsets — pages identified as public records, and pages identified as non-public — and, within each subset, how many were withheld as records that "concerned individuals having the surname Hanson, but with no relation to" me.

3. Please provide that same public / non-public breakdown as it stood at the time of the May 4, 2026 production of the 53 pages.
4. Please also provide the breakdown as it stood at each later point the University's categorization may have changed — including when my follow-up correspondence was received, and when the University prepared its Response to the writ — so the record reflects how the numbers stood at each stage.

The search queries, hit lists, and audit logs I have requested in PRR2 should independently establish these counts although again this should have been produced long ago.

Discovery and the University's stated intention. You stated that the University intends to file a Motion for Protective Order to block at least some of the discovery I served or requested on July 13. Before the University files that motion, I ask that you state in writing, item by item, which discovery the University objects to and which it will provide. For clarity, the July 13 discovery consists of the following:

Written discovery served July 13, 2026:

1. Petitioner's First Requests for Admission;
2. Petitioner's First Set of Interrogatories;
3. Petitioner's First Request to Produce.

Depositions for which I requested available dates (within seven days) on July 13, 2026:

4. John Hines, the University's sole affiant;
5. A Rule 1.310(b)(6) University designee with knowledge of the search and the records-portal communications;
6. Dr. David Cuillier, whose correspondence with me comprises the bulk of the University's production and who is a central fact witness on the adequacy of the search.

These depositions go to the adequacy and conduct of the University's search — what was searched, what was located, and on what basis records were or were not produced. Please state the University's position on each of the six items above before the University files any protective-order motion, and in any event by Monday, July 20. If the University contends any item requires leave of court, please state the legal basis. As to Dr. Cuillier, please also advise whether your office will accept service of a deposition subpoena on his behalf, or whether he must be served as a non-party.

Open timelines. For the avoidance of doubt:

- Monday, July 20: the five business days I requested for the University either to produce the remaining 425 located pages, or to provide a particularized log identifying each page not produced and the specific basis for it. A conclusory assertion that records "did not meet the definition of public records," or concern other individuals with the surname "Hanson" (Hines Aff. ¶17), does not satisfy the burden the University's own cited authority places on the party resisting production. If no log is provided, I will ask Judge Keim for an in camera inspection.
- Wednesday, July 22: please provide an estimated production date for the PRR2 workflow records.
- Preservation: I again ask that the University direct UFIT and all relevant personnel to suspend any automatic deletion or overwriting and preserve all located pages, together with the associated search queries, hit lists, outputs, logs, and metadata. Please confirm preservation in writing; that confirmation costs the University nothing and need not await a hearing date.

The University's affidavit swears that UFIT located over 470 pages through Petitioner's own search terms (Hines Aff. ¶16); the University produced 53 pages, consisting of my own correspondence with its faculty; it has not produced the remainder; and it now intends to move to avoid routine discovery. What is it that the University is unwilling to disclose?

I understand the Court is scheduling a 30-minute case management conference. I was very much hoping that we would be able to move the case along more efficiently. Please provide answers on the above and if there's anything you need from me. Thank you for your cooperation.

Respectfully,

Christopher A. Hanson, Esq.
Florida Bar No. 44094
cahanson77@yahoo.com · 727-409-5738
*Self-represented Petitioner**

On Tuesday, July 14, 2026 at 08:35:24 AM EDT, Kirkconnell,James W <jameswk@ufl.edu> wrote:

Hi Mr. Hanson,

Thank you for your email. Rule 1.630 does not contemplate a reply to a response, so for that reason UF does not take a position on your request for an extension.

My legal assistant will be contacting Judge Keim's office this morning about scheduling a hearing pursuant to FS § 119.11(1) and/or an *in camera* review. Once we hear from the judge we can coordinate a hearing time. At that point the parties can address your discovery requests if necessary.

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simple. I write separately to give the University the opportunity to resolve the core of this case without further judicial time.

1. Demand for production. Mr. Hines has sworn that UFIT "gathered over 470 pages of documents, including Petitioner's correspondence with UF faculty." (Hines Aff. ¶ 6.) The University produced 53 pages — its correspondence directly with me — and nothing else, explaining the difference only as records that "did not meet the definition of public records" or "concerned individuals having the surname Hanson, but with no relation to the Petitioner." (Hines Aff. ¶ 7.)

The University judged my own letters responsive and produced additional copies back to me; and everything I did not already possess, it withheld. On behalf of Petitioners, I ask that the University produce the remainder of the located pages now. If the University maintains that any located page is exempt, is not a public record, or is not responsive, please identify each such page and state the basis with particularity — whichever of those grounds applies — consistent with the burden the University's own cited authority places on the party resisting production. A response within five (5) business days would allow the parties to narrow the issues before the Court takes them up.

To be clear, the correspondence the University returned to me is not what this case is about. The matters requiring attention are the records I do not have — including the case-number and keyword material the University's filings have not yet addressed. Those issues are framed in the enclosed discovery rather than argued in this letter. I am including the contact for the records custodian department due to the additional public records request attached here to

2. Discovery. Served with this letter are Petitioner's First Requests for Admission, First Set of Interrogatories, and First Request to Produce, each directed to the facts the University itself put in issue through the Hines affidavit: what was searched, what was found, what was withheld, and on what stated basis. Given the statutory priority of this action under Section 119.11(1), Florida Statutes, Petitioner requests that the University respond on an expedited basis; if the University believes discovery in this proceeding requires leave of court or a different schedule, please say so promptly and Petitioner will take the question to the Court rather than let it lie.

3. Depositions. Please provide, within seven (7) days, available deposition dates within the next thirty (30) days for each of the following:

(a) **John Hines**, whose affidavit the University has placed at the center of its Response, and who swears he personally "delivered the responsive public records to Petitioner" on May 4, 2026 (Aff. ¶ 8) — a delivery made by an email that, like every University communication concerning the Request, identified no individual by name or title;

(b) **A University designee under Rule 1.310(b)(6)** with knowledge of the handling of Request No. W018463-032626 — including the identity and role of each person who authored, reviewed, or approved the University's communications to me of March 26, April 23, May 4, and May 8, 2026, each sent unsigned from the University's records-portal mailbox notwithstanding my express, repeated requests that the responsible individual be identified; the searches actually run; and the disposition of the gathered pages; and

(c) **Mr. David Cuillier**, whose correspondence with me constitutes the entirety of the University's production and whose records bear directly on the adequacy of the University's search.

Petitioner offers to coordinate scheduling cooperatively; if the parties are unable to coordinate, Petitioner will raise scheduling with the Court at the Section 119.11(1) hearing. If the University contends that any deposition in this proceeding requires leave of court, please say so promptly.

4. Preservation. Demand is renewed that the University preserve, and direct UFIT and all personnel to preserve: the 470+ pages gathered; all UFIT search outputs, hit lists, queries, and

logs associated with request W018463-032626; the May 4, 2026 delivery package; and all records concerning the handling of the request — on every system and backup where they reside, with associated metadata, and with any automatic deletion or overwriting suspended.

This correspondence is written to resolve issues, not multiply them. If the University will produce the located records or lodge them with the Court per its own footnoted offer, much of what follows becomes unnecessary. I look forward to your prompt response.

Respectfully,

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner

PART E

Email to Kirkconnell re: PRR W018964 + conferral (as sent 7/18/26)



Chris Hanson <christophhanson77@gmail.com>

W018964 production received — inconsistencies requiring clarification before the July 20 deadline — and opening the Rule 1.200 conferral for the August 24 case management conference — Hanson v. UF, No. 01-2026-CA-001794

cahanson77@yahoo.com <cahanson77@yahoo.com>

Sat, Jul 18, 2026 at 11:42 PM

To: "Kirkconnell, James W" <jameswk@ufl.edu>

Cc: "LoGiurato, Kimberly" <klogiurato@ufl.edu>, chris hanson <christophhanson77@gmail.com>

Mr. Kirkconnell,

On July 17 the University produced its response to my June 5, 2026 records request (Ref. W018964-060526) – the processing and legal-review file for Request No. W018463-032626. Thank you. I note at the outset what the production is and is not: it consists of the University's internal correspondence and its portal audit log. It contains none of the located pages themselves. The 425 located-but-unproduced pages addressed in my July 16 email and our July 15 conversation remain unproduced, and my request – as stated in my Reply and in that email – remains for all located records.

One housekeeping item. The University's May 8, 2026 message asked whether I "seek those public records" containing the search term "Hanson" that the University says relate to other individuals with the same surname. My request has sought those records since March 26, 2026 – it listed the term "Hanson" without qualification, my May 4 letter objected the same day that the production omitted everything beyond my own correspondence, and my Petition and Reply seek all located records. Without waiving the position that the request was never ambiguous on this point: yes, I seek them. The University's own audit log shows the request was re-opened to "Requested Clarification" status on May 8 and never closed; this email answers that question in writing.

The production materially sharpens the questions in my July 16 email, and raises new ones. In the University's own produced documents:

1. The page-count ledger does not match figures from the affidavit and the one you confirmed during our call. On our July 15 call you confirmed UFIT located 478 pages; the Hines affidavit swears to "over 470 pages" (¶6). The University's internal ledger in this production logs: 340 pages on March 30 (330 from UFIT, "EXCLUDING Attachments," plus 10 from Dr. Cuillier); "109 rerun PAGES" on May 4; 17 additional messages recovered the same day (page count unstated); an 88-page "SpecificKeywords" extraction on May 7; and "the 621 pages received from UFIT on 04/24/26" (Ms. Wood's May 7 email).

The arithmetic frames the question. The March 30 batch (340) plus the May 4 rerun (109) totals 449 pages – both counted, by UFIT's own captions, excluding attachments. Add the attachments and the 17 recovered messages, and the total lands almost exactly at the "over 470" the affidavit swears to and the 478 you confirmed. What that arithmetic suggests is this: the 478 figure appears to

count only the March and May batches — and to exclude the 621 pages UFIT delivered on April 24 entirely. Please state whether that is so.

And that makes the April 24 batch the question that has to be answered: if those 621 pages are an overlapping re-export, or belong to a different request — the same email records them being misfiled under a folder styled "W018643-042326" — please say so plainly. If they are a distinct set of located pages for this request, then the located universe is not 478 pages but more than 1,000, and the affidavit and your confirmed count both require correction. Two of my pending requests already call for the records that answer this: Questions 1–4 of my July 16 email ask which batches make up the 478 and what became of each; and parts 1 through 3 of my July 13 records request (Ref. W019186-071326) separately seek the underlying records themselves — the UFIT search outputs, the per-term search records, and any index or log showing what was gathered and what was produced. Those are existing records — this production shows they exist — so answering requires retrieving them, not creating anything.

2. The search failure was documented in writing hours before the University declared the request complete. At 10:40 AM on May 4, 2026, UFIT wrote that the search tool had "stalled before completing the search of Professor Bambauer's mailbox," that this was "likely an indexing error," and that it had identified "17 other messages that matched the criteria and should have been included previously." At 3:11:24 PM that same afternoon — four hours and thirty-one minutes later — the University's portal log records the request marked "Completed/Closed." At 3:22:02 PM, eleven minutes after that, the production issued, stating "This completes the public records request."

To be clear, I am not asking whether the 17 recovered messages, the 109-page rerun, or the 88-page extraction were ever produced to me — they were not. The University's entire production to date remains the 53 pages sent on May 4, consisting of my own correspondence. So the questions are these: Did the affidavit's description of the search account for the May 4 failure? And when will the 17 recovered messages, the 109-page rerun, and the 88-page extraction be produced — or, for any of them the University intends to withhold, what is the specific legal basis, stated with particularity, item by item? If the University somehow contends any of these materials are already within the 53 pages, please identify them by page.

(For completeness, so there is no dispute later: the University's production renders this UFIT message twice — at pages 119 and 199 of emails_1.pdf, timestamped 10:40 AM, and at page 93, timestamped 7:40 AM. The 10:40 AM rendering is the coherent one: the message it answers is timestamped 9:29 AM, and Ms. Wood's 11:11 AM email quotes it as 10:40 AM. I cite the 10:40 AM copies. If the University's position on the timestamp differs, please say so now.)

3. Located, responsive, never-produced categories with no stated basis. The production shows: (a) Associate Counsel's May 4 instruction that "[t]he second document in the 'produce' folder does not need to be forwarded" — please identify that document and the basis for not forwarding it; (b) Dr. Cuillier's May 6 statements that searches of his own mailbox return "a few dozen emails" containing "surveillance video" and "some emails regarding '13th Circuit'" —

terms my request expressly listed as standalone keywords, a reading the University's own internal correspondence considered (Associate Counsel's May 6 email, while noting the request was "not precisely clear," recognized it "could be" seeking "any public record referencing one or more of these terms whether or not related to him") – with no indication those emails were ever pulled or reviewed; and (c) Professor Bambauer's clearance addressed only her text messages; nothing in the production certifies any search of her memoranda, notes, or draft research or survey data – categories my request expressly named.

4. The University's "no records" answers in W018964 cannot be squared with its own attachments. The response states the University "does not have public records responsive to parts 2, 3, 7 and 8."

Part 7 requested: "All records reflecting the decision to withhold from production records containing the term 'Hanson' on the ground that they 'relate to individuals who are not' the requester – including who made that determination, when it was made, and any written basis for it." The production itself contains such records – the May 8 drafting instruction, the May 4 "second document" instruction, and the custodians' relevance determinations. I ask the University to correct or supplement its W018964 response accordingly.

Parts 2 and 3 present a distinct problem. Part 2 sought records of the engagement of outside counsel; part 3 was pled expressly "[i]n the alternative, if the legal review was performed internally," and sought matter-opening, time, and internal billing records. The two are mutually exclusive by construction, and the University has answered "no records" to both – while its own May 5 message states that "all located records incurred a legal review," and this production shows that review being performed internally by Associate Counsel. Please state which of the two the University maintains: 1) that no outside counsel was engaged and no internal record of the review exists in any form, or 2) that one of these answers requires correction.

Part 8 requested: "Any University policies, procedures, guidelines, or training materials governing 'legal review' of public records requests." If the University stands on its answer that no such policies, procedures, guidelines, or training materials exist, please confirm that in writing.

5. Preservation, updated with specifics. My preservation request now extends expressly to items the production identifies: the ISS-444193 ticket and all associated records; both Dropbox transfer folders referenced in UFIT's March 30 and May 4 emails – Dropbox links are ephemeral, so please confirm their contents have been preserved outside that platform; the U-drive folders referenced by path in the production (e.g., "W018463-032626\Fr UFIT 03-30-26," "...\\Fr UFIT 05-07-26," "...\\Fr JB 05-05-26," "...\\Fr DC 05-05-26"); and the April 24 621-page batch, wherever and to whichever request it belongs.

6. Nothing that remains requires more time. On the University's own record, every located batch has been in hand for months: the 340 pages since March 30, the 621-page batch since April 24, the rerun and the recovered messages since May 4 – the newest of them more than ten weeks ago. These records have been at issue in this mandamus since the Petition was filed on June 4, and squarely so since the Court's June 12 Order to Show Cause.

The University's Response pled no statutory exemption as to any of them, and its own May 5, 2026 message states that "all located records incurred a legal review" – the review, on the University's own account, is complete. Section 119.07(1)(e) requires any refusal to state the basis with particularity, and the only delay the statute tolerates is the reasonable time to retrieve records and redact exempt portions. Retrieval is done; no exemption has been claimed; no redaction has been identified. So I ask directly: what, specifically, does the University contend now stands between the located pages and production? If the answer is a legal basis, state it with particularity, page by page. If the answer is nothing, produce them.

7. The August 24 conference – opening the Court-ordered conferral now. The Court's July 16 order requires the parties to confer on a proposed trial date and trial length not less than twenty-five days before the conference – that is, on or before July 30 – and to file a case management statement, jointly or separately, not less than fifteen days before. I am opening that conferral now, in writing, twelve days ahead of the conferral deadline, so that both directives can be met. Petitioner's positions under paragraph 4 of the order:

(a) Designation: streamlined. This is a summary mandamus proceeding under an issued Order to Show Cause, and section 119.11(1) entitles it to an immediate hearing and priority over other pending cases.

(b)/(f) Disposition: the case should conclude with a non-jury final hearing on the writ – no conventional trial is required. Petitioner proposes that the final hearing be set at, or promptly after, discovery closes.

(e) Discovery: the three depositions noticed July 13 (Mr. Hines; a designee under Rule 1.310(b)(6) on the search; Dr. Cuillier), completable within thirty days of the University's cooperation; the responses to requests for documentary discovery (already served); and any in camera inspection the Court orders.

(d) Mediation: Petitioner does not oppose an early mediation deadline, though production of the located records would likely make it unnecessary.

(k)/(l) Pending matters for the conference: the merits of the writ; production or the in camera inspection of every located batch; the deposition schedule; and the discovery positions due July 20.

Please provide the University's positions on paragraph 4(a)–(l) by Friday, July 24, so that a joint statement remains possible within the Court's schedule. I will be candid about the difficulty: whether the parties can file jointly may turn on the University's July 20 responses. If the University maintains the discovery objections referenced in my July 16 email and continues to withhold the located pages without a stated basis, agreement on a schedule is unlikely – and in that event each side will file separately under paragraph 5, and Petitioner's statement will set out this conferral history. I would prefer the joint route, and this email is my effort, in good faith and in writing, to make it possible. If you insist on filing motions related to my discovery requests, that will delay matters further.

None of this changes the timelines in my July 16 email: Monday, July 20 remains the date for production of the located pages or a page-by-page log, for the University's item-by-item discovery positions, and for written preservation confirmation; Wednesday, July 22 remains the date for the W019186-071326 production estimate. The items above can be answered together with those responses. If they are not, I will present the production's contents – each of the items above – to Judge Keim at the August 24 conference (or before), and I will ask that production and any in camera inspection encompass every located batch, not a subset selected by the University.

Finally, for the record: this is my first correspondence to you following both the University's July 17 production and the Court's July 16 order. I have tried to put every position on the production, on discovery, and on the conference in writing, in one place, with time to spare under each of the Court's deadlines.

I hope to work with you to make this efficient moving forward, especially in light of all of the unexplained delays to date and the urgency in resolving these matters.

Respectfully,

Christopher A. Hanson, Esq.
Florida Bar No. 44094
cahanson77@yahoo.com • 727-409-5738
Self-represented Petitioner

On Thursday, July 16, 2026 at 02:31:54 PM EDT, cahanson77@yahoo.com
<cahanson77@yahoo.com> wrote:

Mr. Kirkconnell,

I write to memorialize our telephone conversation yesterday and to set out, in one place, where the production, preservation, and discovery issues stand following that call. If your recollection of any of the points below differs from mine, please tell me promptly in writing.

The "personal records" question, production, and in camera review. On our call, you indicated that the University may treat some of the located records as "personal" in nature and outside public-records consideration. I want to be clear about my position on that. I'm requesting all records identified including any that may appear personal – to be identified and produced. Florida law begins from a constitutional presumption of access to public records (Art. I, § 24, Fla. Const.; § 119.01, Fla. Stat.). Whether any particular located page falls outside Chapter 119 as genuinely personal is a question ultimately decided by the Court.

If the University intends to withhold any page(s) of the documents identified in relation to my request, from Court consideration, please let me and the Court know so that we can have a formal determination on that.

The University's sworn affidavit does not describe any located record as "personal": it states only that "some records did not meet the definition of public records," and that others "concerned individuals having the surname Hanson, but with no relation to the Petitioner" (Hines Aff. ¶17). I assume those are the "personal" records you mentioned yesterday?

Whatever ground the University relies on, it should be stated page by page. Accordingly, I ask that the University either (i) the full set of located pages, or (ii) provide a page-by-page log stating the basis for withholding each page.

During our call, you also confirmed that UFIT located 478 pages in its search. I want the record clear on that figure, because Mr. Hines's affidavit disclosed only the approximation that UFIT "gathered over 470 pages of documents, including Petitioner's correspondence with UF faculty" (Hines Aff. ¶16), rather than the exact count. The University produced 53 pages — my own correspondence with UF faculty, which I already had — leaving 425 located pages that have not been produced. I intend to develop the basis for that cull, and for the search itself, through my pending workflow records request (PRR2, Ref. W019186-071326), which seeks the search queries, hit lists, audit logs, system metadata, and the complete portal/GovQA trail for the W018463-032626 search, including all attachments.

Given the delays in this process, and the University's evolving explanations — the unexplained legal process delay, no information at first production about the records the University withheld, and only piecemeal detail since — I would appreciate some clarification about the 478 figure and how the located pages break down.

This should not have to wait for the more recent requests to work their way through. So that the parties can narrow these issues before involving the Court, please address the following:

1. Is 478 the total number of pages the search identified — including both the pages the University considers public records and those it considers non-public?
2. Please state that total as its two subsets — pages identified as public records, and pages identified as non-public — and, within each subset, how many were withheld as records that "concerned individuals having the surname Hanson, but with no relation to" me.
3. Please provide that same public / non-public breakdown as it stood at the time of the May 4, 2026 production of the 53 pages.
4. Please also provide the breakdown as it stood at each later point the University's categorization may have changed — including when my follow-up correspondence was received, and when the University prepared its Response to the writ — so the record reflects how the numbers stood at each stage.

The search queries, hit lists, and audit logs I have requested in PRR2 should independently establish these counts although again this should have been produced long ago.

Discovery and the University's stated intention. You stated that the University intends to file a Motion for Protective Order to block at least some of the discovery I served or requested on July 13. Before the University files that motion, I ask that you state in writing, item by item, which

discovery the University objects to and which it will provide. For clarity, the July 13 discovery consists of the following:

Written discovery served July 13, 2026:

1. Petitioner's First Requests for Admission;
2. Petitioner's First Set of Interrogatories;
3. Petitioner's First Request to Produce.

Depositions for which I requested available dates (within seven days) on July 13, 2026:

4. John Hines, the University's sole affiant;
5. A Rule 1.310(b)(6) University designee with knowledge of the search and the records-portal communications;
6. Dr. David Cuillier, whose correspondence with me comprises the bulk of the University's production and who is a central fact witness on the adequacy of the search.

These depositions go to the adequacy and conduct of the University's search — what was searched, what was located, and on what basis records were or were not produced. Please state the University's position on each of the six items above before the University files any protective-order motion, and in any event by Monday, July 20. If the University contends any item requires leave of court, please state the legal basis. As to Dr. Cuillier, please also advise whether your office will accept service of a deposition subpoena on his behalf, or whether he must be served as a non-party.

Open timelines. For the avoidance of doubt:

- Monday, July 20: the five business days I requested for the University either to produce the remaining 425 located pages, or to provide a particularized log identifying each page not produced and the specific basis for it. A conclusory assertion that records "did not meet the definition of public records," or concern other individuals with the surname "Hanson" (Hines Aff. ¶7), does not satisfy the burden the University's own cited authority places on the party resisting production. If no log is provided, I will ask Judge Keim for an in camera inspection.
- Wednesday, July 22: please provide an estimated production date for the PRR2 workflow records.
- Preservation: I again ask that the University direct UFIT and all relevant personnel to suspend any automatic deletion or overwriting and preserve all located pages, together with the associated search queries, hit lists, outputs, logs, and metadata. Please confirm preservation in writing; that confirmation costs the University nothing and need not await a hearing date.

The University's affidavit swears that UFIT located over 470 pages through Petitioner's own search terms (Hines Aff. ¶6); the University produced 53 pages, consisting of my own correspondence with its faculty; it has not produced the remainder; and it now intends to move to avoid routine discovery. What is it that the University is unwilling to disclose?

I understand the Court is scheduling a 30-minute case management conference. I was very much hoping that we would be able to move the case along more efficiently. Please provide answers on the above and if there's anything you need from me. Thank you for your cooperation.

Respectfully,

Christopher A. Hanson, Esq.
Florida Bar No. 44094
cahanson77@yahoo.com · 727-409-5738
*Self-represented Petitioner**

On Tuesday, July 14, 2026 at 08:35:24 AM EDT, Kirkconnell,James W <jameswk@ufl.edu> wrote:

Hi Mr. Hanson,

Thank you for your email. Rule 1.630 does not contemplate a reply to a response, so for that reason UF does not take a position on your request for an extension.

My legal assistant will be contacting Judge Keim's office this morning about scheduling a hearing pursuant to FS § 119.11(1) and/or an *in camera* review. Once we hear from the judge we can coordinate a hearing time. At that point the parties can address your discovery requests if necessary.

Lastly, the public records request contained in your email has been forwarded to Mr. Hines and will be processed in due course.

Thanks,
Jim

Jim Kirkconnell
Assistant Counsel
UF Office of General Counsel
(352) 392-1358

From: cahanson77@yahoo.com <cahanson77@yahoo.com>

Sent: Monday, July 13, 2026 1:57 PM

To: chris hanson <christophhanson77@gmail.com>; universityofflorida@mycusthelp.net; Kirkconnell,James W <jameswk@ufl.edu>

Subject: RE: *Hanson v. University of Florida Board of Trustees, et al.*, No. 01-2026-CA-001794 (Fla. 8th Cir.)

[External Email]

Dear Mr. Kirkconnell:

I am drafting the Reply to the University's Response to the Order to Show Cause. I may need an extra 5–7 days to finish the reply. Do you have any objection to an extension of 7 days?

Additionally, efficiency is my primary objective here. I have encountered enormous, unnecessary obstacles and delays in the courts over the past two years. What I am requesting from UF is

simple. I write separately to give the University the opportunity to resolve the core of this case without further judicial time.

1. Demand for production. Mr. Hines has sworn that UFIT "gathered over 470 pages of documents, including Petitioner's correspondence with UF faculty." (Hines Aff. ¶ 6.) The University produced 53 pages — its correspondence directly with me — and nothing else, explaining the difference only as records that "did not meet the definition of public records" or "concerned individuals having the surname Hanson, but with no relation to the Petitioner." (Hines Aff. ¶ 7.)

The University judged my own letters responsive and produced additional copies back to me; and everything I did not already possess, it withheld. On behalf of Petitioners, I ask that the University produce the remainder of the located pages now. If the University maintains that any located page is exempt, is not a public record, or is not responsive, please identify each such page and state the basis with particularity — whichever of those grounds applies — consistent with the burden the University's own cited authority places on the party resisting production. A response within five (5) business days would allow the parties to narrow the issues before the Court takes them up.

To be clear, the correspondence the University returned to me is not what this case is about. The matters requiring attention are the records I do not have — including the case-number and keyword material the University's filings have not yet addressed. Those issues are framed in the enclosed discovery rather than argued in this letter. I am including the contact for the records custodian department due to the additional public records request attached here to

2. Discovery. Served with this letter are Petitioner's First Requests for Admission, First Set of Interrogatories, and First Request to Produce, each directed to the facts the University itself put in issue through the Hines affidavit: what was searched, what was found, what was withheld, and on what stated basis. Given the statutory priority of this action under Section 119.11(1), Florida Statutes, Petitioner requests that the University respond on an expedited basis; if the University believes discovery in this proceeding requires leave of court or a different schedule, please say so promptly and Petitioner will take the question to the Court rather than let it lie.

3. Depositions. Please provide, within seven (7) days, available deposition dates within the next thirty (30) days for each of the following:

(a) **John Hines**, whose affidavit the University has placed at the center of its Response, and who swears he personally "delivered the responsive public records to Petitioner" on May 4, 2026 (Aff. ¶ 8) — a delivery made by an email that, like every University communication concerning the Request, identified no individual by name or title;

(b) **A University designee under Rule 1.310(b)(6)** with knowledge of the handling of Request No. W018463-032626 — including the identity and role of each person who authored, reviewed, or approved the University's communications to me of March 26, April 23, May 4, and May 8, 2026, each sent unsigned from the University's records-portal mailbox notwithstanding my express, repeated requests that the responsible individual be identified; the searches actually run; and the disposition of the gathered pages; and

(c) **Mr. David Cuillier**, whose correspondence with me constitutes the entirety of the University's production and whose records bear directly on the adequacy of the University's search.

Petitioner offers to coordinate scheduling cooperatively; if the parties are unable to coordinate, Petitioner will raise scheduling with the Court at the Section 119.11(1) hearing. If the University contends that any deposition in this proceeding requires leave of court, please say so promptly.

4. Preservation. Demand is renewed that the University preserve, and direct UFIT and all personnel to preserve: the 470+ pages gathered; all UFIT search outputs, hit lists, queries, and

logs associated with request W018463-032626; the May 4, 2026 delivery package; and all records concerning the handling of the request — on every system and backup where they reside, with associated metadata, and with any automatic deletion or overwriting suspended.

This correspondence is written to resolve issues, not multiply them. If the University will produce the located records or lodge them with the Court per its own footnoted offer, much of what follows becomes unnecessary. I look forward to your prompt response.

Respectfully,

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner

PART F

Deposition notice service + Hall reply (as sent/received 7/24/26 - 7/27/26)



Chris Hanson <christophhanson77@gmail.com>

Re: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794

Theresa Hall <hallt@circuit8.org>

Mon, Jul 27, 2026 at 7:16 AM

To: "cahanson77@yahoo.com" <cahanson77@yahoo.com>, "LoGiurato,Kimberly" <klogiurato@ufl.edu>, "Kirkconnell,James W" <jameswk@ufl.edu>

Cc: "christophhanson77@gmail.com" <christophhanson77@gmail.com>

The Court should not be copied on these types of emails. Only include me on emails where you are obtaining hearing dates and times.

Thank you and have a great day.

Theresa J. Hall, Judicial Assistant to
Honorable Donna M. Keim

201 E University Avenue, Room 416
Gainesville, Florida 32601
(352) 374-3646

Divisional Instructions for Div. J <https://circuit8.org/wp-content/uploads/Alachua-County-Circuit-Civil-Division-J-Civil-Policies-and-Procedures.pdf>

PLEASE BE ADVISED THAT THE CLERK OF COURT OFTEN DOES NOT DOCKET PLEADINGS UNTIL 3-8 DAYS AFTER THEY ARE FILED. PLEASE INCLUDE A COPY OF ANY RELEVANT PLEADINGS WHEN YOU EMAIL THE COURT TO REQUEST A HEARING OR ENTRY OF AN ORDER.

Please be advised that Canon 3(B)(7) of the Code of Judicial Conduct prohibits a judge from considering ex parte communications or other communications made to a judge outside the presence of the parties concerning a pending or impending matter.

From: cahanson77@yahoo.com <cahanson77@yahoo.com>**Sent:** Friday, 24 July 2026 17:00:17**To:** Theresa Hall <hallt@circuit8.org>; LoGiurato,Kimberly <klogiurato@ufl.edu>; Kirkconnell,James W <jameswk@ufl.edu>**Cc:** christophhanson77@gmail.com <christophhanson77@gmail.com>**Subject:** Re: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794

Mr. Kirkconnell,

Because the University has declined to coordinate deposition dates and the expedited nature of these proceedings, I am sending notices of some of the depositions we've discussed so the schedule is fixed and the parties can bring any dispute before the Court on a defined timeline. Attached are:

1. Notice of Taking Deposition of John Hines (the University's Director of Public Records and affiant) — Monday, August 3, 2026, 3:00 p.m. ET, by Zoom;
2. Notice of Taking Deposition of Professor Jane Bambauer — Monday, August 3, 2026, 1:00 p.m. ET, by Zoom; and
3. A subpoena for the deposition of Professor Bambauer under Rule 1.410.

Both depositions concern a narrow, defined subject: the conduct and results of the search of request No. W018463-032626 — what was searched, what was located, what was produced, withheld etc., and on what basis. Mr. Hines is the University's records custodian and its affiant; his attendance is requested on this Notice, without a subpoena, as a managing agent of the University.

So that the depositions are productive and the parties' time is not wasted, I ask that the University make the records at issue — the located pages and the search artifacts (queries, hit lists, audit logs) for request No. W018463-032626 — available for reference at the depositions, or produce them beforehand. This is the some material sought in my pending discovery and in PRR2, and having it available will allow these depositions to resolve, rather than multiply, the issues before the Court.

To avoid unnecessary cost and process, please let me know

- whether your office will **accept service of the subpoena on Professor Bambauer's behalf**, or whether your position is she must be served personally as a non-party; and

- whether the University will **produce Mr. Hines for his deposition on this Notice** without the need for a subpoena.

If the University intends to move for a protective order as to either deposition, I ask that you file it promptly so the Court can resolve it before August 3, and I remain willing to confer by phone first. I am also willing to discuss the Zoom logistics and the court reporter once those are set. If it is more efficient to take up the deposition schedule at the case management conference now being set, I am glad to do that as well, provided the dates are preserved in the meantime.

Respectfully,

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738

Self-represented Petitioner

On Thursday, July 16, 2026 at 09:29:44 AM EDT, Kirkconnell,James W <jameswk@ufl.edu> wrote:

Thank you, Ms. Hall.

Jim Kirkconnell
Assistant Counsel
UF Office of General Counsel

(352) 392-1358

From: Theresa Hall <hallt@circuit8.org>
Sent: Thursday, July 16, 2026 7:23 AM
To: Kirkconnell,James W <jameswk@ufl.edu>; cahanson77@yahoo.com; LoGiurato,Kimberly <klogiurato@ufl.edu>
Cc: christophhanson77@gmail.com
Subject: Re: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

[External Email]

I have this on the calendar and I will present an order to Judge Keim to set the case management conference.

Thank you and have a great day.
Theresa J. Hall, Judicial Assistant to
Honorable Donna M. Keim
Family and Civil Justice Center
201 E University Avenue, Room 416
Gainesville, Florida 32601
(352) 374-3646

Gilchrist County Courthouse
112 South Main Street Trenton, FL 32693-3200
(352) 374-3646

Union County Courthouse
55 West Main Street Lake Butler, Florida 32054-1600
(352) 374-3646

Divisional Instructions for Div. CA1 <https://circuit8.org/wp-content/uploads/Alachua-County-Circuit-Civil-Division-J-Civil-Policies-and-Procedures.pdf>

PLEASE BE ADVISED THAT THE CLERK OF COURT OFTEN DOES NOT DOCKET PLEADINGS UNTIL 3-8 DAYS AFTER THEY ARE FILED. PLEASE INCLUDE A COPY OF ANY RELEVANT PLEADINGS WHEN YOU EMAIL THE COURT TO REQUEST A HEARING OR ENTRY OF AN ORDER.

Please be advised that Canon 3(B)(7) of the Code of Judicial Conduct prohibits a judge from considering ex parte communications or other communications made to a judge outside the presence of the parties concerning a pending or impending matter.

From: Kirkconnell,James W <jameswk@ufl.edu>
Sent: Wednesday, July 15, 2026 4:07 PM
To: Theresa Hall <hallt@circuit8.org>; cahanson77@yahoo.com <cahanson77@yahoo.com>; LoGiurato,Kimberly <klogiurato@ufl.edu>
Cc: christophhanson77@gmail.com <christophhanson77@gmail.com>
Subject: RE: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

Hi Ms. Hall,

I am available for any of those times. Please let me know which slot the Court prefers, and our office can file a notice of hearing.

Thanks,
Jim

Jim Kirkconnell
Assistant Counsel
UF Office of General Counsel
(352) 392-1358

From: Theresa Hall <hallt@circuit8.org>
Sent: Wednesday, July 15, 2026 11:52 AM
To: cahanson77@yahoo.com; LoGiurato, Kimberly <klogiurato@ufl.edu>
Cc: Kirkconnell, James W <jameswk@ufl.edu>; christophhanson77@gmail.com
Subject: RE: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

[External Email]

If Mr. Kirkconnell is available I will set a case management conference for 30 minutes on any of the dates he is available as long as it is still open.

Thank you and have a great day.
Theresa J. Hall, Judicial Assistant to
Honorable Donna M. Keim
Family and Civil Justice Center
201 E University Avenue, Room 416
Gainesville, Florida 32601
(352) 374-3646

Gilchrist County Courthouse
112 South Main Street
Trenton, FL 32693-3200
(352) 374-3646

Union County Courthouse
55 West Main Street
Lake Butler, Florida 32054-1600
(352) 374-3646

Divisional Instructions for Div. CA1 <https://circuit8.org/wp-content/uploads/Alachua-County-Circuit-Civil-Division-J-Civil-Policies-and-Procedures.pdf>

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Please be advised that Canon 3(B)(7) of the Code of Judicial Conduct prohibits a judge from considering ex parte communications or other communications made to a judge outside the presence of the parties concerning a pending or impending matter.

From: cahanson77@yahoo.com <cahanson77@yahoo.com>
Sent: Wednesday, July 15, 2026 11:40 AM
To: LoGiurato, Kimberly <klogiurato@ufl.edu>; Theresa Hall <hallt@circuit8.org>

Cc: Kirkconnell,James W <jameswk@ufl.edu>; christophhanson77@gmail.com

Subject: Re: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

Hi Ms. Hall. How long and for what type of hearing are these blocks for?

The only thing that we may need now is a case management conference - probably 30 minutes and preferably by zoom if acceptable to Judge Keim.

I'm hoping to hear back from Mr. Kirkconnell on what we can agree on.

If these slots are for the 30 minute case management conference, I will make any of the 3 work and would request that we get that on the calendar now so we don't lose the dates. If we resolve all of the outstanding disputes and procedures, we can cancel immediately.

Please let me know if you need anything else from me. Thank you for your prompt attention on this.

Chris Hanson
FL Bar #44094
727-409-5738

On Wednesday, July 15, 2026 at 11:11:18 AM EDT, Theresa Hall <hallt@circuit8.org> wrote:

Good morning:

Are the parties requesting a hearing at this time or are you working on the issues without court intervention? If you are requesting a hearing my first available times are as follows:

8/24 at 11:00
8/24 at 1:30
8/26 at 2:15

Thank you and have a great day.
Theresa J. Hall, Judicial Assistant to
Honorable Donna M. Keim
Family and Civil Justice Center
201 E University Avenue, Room 416
Gainesville, Florida 32601
(352) 374-3646

Gilchrist County Courthouse
112 South Main Street Trenton, FL 32693-3200
(352) 374-3646

Union County Courthouse
55 West Main Street Lake Butler, Florida 32054-1600
(352) 374-3646

Divisional Instructions for Div. CA1 <https://circuit8.org/wp-content/uploads/Alachua-County-Circuit-Civil-Division-J-Civil-Policies-and-Procedures.pdf>

PLEASE BE ADVISED THAT THE CLERK OF COURT OFTEN DOES NOT DOCKET PLEADINGS UNTIL 3-8 DAYS AFTER THEY ARE FILED. PLEASE INCLUDE A COPY OF ANY RELEVANT PLEADINGS WHEN YOU EMAIL THE

COURT TO REQUEST A HEARING OR ENTRY OF AN ORDER.

Please be advised that Canon 3(B)(7) of the Code of Judicial Conduct prohibits a judge from considering ex parte communications or other communications made to a judge outside the presence of the parties concerning a pending or impending matter.

From: cahanson77@yahoo.com <cahanson77@yahoo.com>

Sent: Tuesday, July 14, 2026 1:36 PM

To: Theresa Hall <hallt@circuit8.org>; LoGiurato, Kimberly <klogiurato@ufl.edu>

Cc: Kirkconnell, James W <jameswk@ufl.edu>

Subject: Re: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794:

Good afternoon, the court's order allowed for the attached pleading in response to respondents, July 7th, 2026 filing. Both of the documents were filed timely. My reply references some discovery matters necessary before a final evidentiary hearing would be productive. I agree that production of the 470 plus documents is necessary at this time; but see no basis for it occurring "in camera." An in camera inspection would be proper to evaluate any exemptions at issue, but no exemption is pled. There is a conclusory request for an in camera inspection with no basis to support it. The procedure is simple production.

Mr. Kirkconnell - perhaps you can and I can discuss by phone or email what we can resolve ourselves and what requires a hearing? I'm hoping this can go as efficiently as possible for all involved.

I can be available this afternoon or tomorrow for a call or please send me an email with what issues I raise in the attached reply we can resolve amicably, if you prefer communicating in email. Thank you for your cooperation.

Chris Hanson
FL bar #44094
727-409-5738

On Tuesday, July 14, 2026 at 08:51:46 AM EDT, LoGiurato, Kimberly <klogiurato@ufl.edu> wrote:

Good morning, Ms. Hall

Please let us know if the Court would like the parties to schedule a hearing on this matter pursuant to FS s. 119.11(1) and/or an *in camera* review of the documents in question.

Thank you,



Kimberly LoGiurato
Legal Assistant II
Office of the Vice President and General Counsel
University of Florida
klogiurato@ufl.edu
352-294-1909

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7/31/26, 1:45 PM

Gmail - Re: Petitioner's Reply CC and Response to Request for Hearing Case No. 01-2026-CA-001794

recipient, please destroy all copies of this message and attachments and immediately notify this office by sending a reply e-mail to the sender.
Thank you.

PART G

UF production W018964-060526: Hines email, "The person did not ask for attachments" (PRR production, p. 2)

From: Hines, John
Sent time: 03/30/2026 11:29:17 AM
To: UFIT-eDiscovery
Cc: Quillen, Amy; Wood, Barbara L
Subject: Public Records Request: W018463-032626

Can you please handle the email search for this request? The person did not ask for attachments.

UF Mailboxes:
David Cuillier
Jane Bambauer

Time Frame:
December 1, 2024 to March 26, 2026

Keywords/Search Terms:
"Christopher Hanson"
"Chris Hanson"
["cahanson77@yahoo.com"](mailto:cahanson77@yahoo.com)
"Hanson"
"25-CA-10255"
"24-DR-001150"
"2025-CA-002469"
"2D2025-1936"
"2D2025-0681"
"2D2026-0279"
"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"

Request Language:

"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"](mailto: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"

Please let me know if you have any questions, thanks!
John

PART H

UF production W018964-060526: 5/4/26 10:40 AM email, search tool "stalled before completing" (PRR production, p. 119)

From: Wood, Barbara L
Sent time: 05/04/2026 11:11:08 AM
To: Hines, John; Quillen, Amy
Subject: W018463-032626 RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

All,

I am in receipt of potentially responsive records (109 rerun PAGES; EXCLUDING Attachments) from UFIT (05/04/26) regarding the PRR from W018463-032626. Based on the number of pages, SHALL I PREPARE AN INVOICE?

I have copied the records to Amy Q's PRR U: Drive to be reviewed by the General Counsel and for approval to be released at: W018463-032626\Fr UFIT 05-04-26.

Thank you,

Barbara L. Wood, FRP

Legal Assistant II

Office of the Vice President and General Counsel

University of Florida

PO Box 113125

123 Tigert Hall

Gainesville, FL 32611

352-392-1358 office

352-392-4387 fax

blwood@ufl.edu



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From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>

Sent: Monday, May 4, 2026 10:40 AM

To: Hines, John <jkhines@ufl.edu>

Cc: Wood, Barbara L <blwood@ufl.edu>; Quillen, Amy <abquillen@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>

Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi John,

I have looked into the original search, and it appears that our search tool stalled before completing the search of Professor Bambauer's mailbox. After March 9th, 2026, no further emails were identified in her mailbox, whereas David Cuillier's mailbox was run through the entire requested date range. This is likely an indexing error.

When locating this message, the tool also identified 17 other messages that matched the criteria and should have been included previously. I have included those in PDF format as well.

Please see the Dropbox link attached below for those files:

<https://www.dropbox.com/scl/fo/sr966qqgejewbuilr56ls/AHicql9qLHkJ0ZKQ6v8PRQ0?rlkey=l3vfxgbqu7ogaztyrej1kfli3&st=w2m5xj6r&dl=0>

Thank you,

Daniel Quiros

Cybersecurity Engineer

UF Information Technology

Ayers @ Innovation Square

720 SW 2nd Ave | North Tower, Suite 420

(352) 273-5039

<https://it.ufl.edu/>

How did we do? [Please rate our service.](#)

PART I

UF production W018964-060526: keyword charts showing "Hanson - 113 - 98.26%" and "No attachments were included" (PRR production, pp. 50, 222)

From: UFIT-eDiscovery
Sent time: 03/31/2026 01:29:06 PM
To: Hines,John
Cc: Quillen,Amy; Wood,Barbara L; UFIT-eDiscovery
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

Hi John,

Absolutely, please see the keyword chart for this search below:

Keyword	Message	Percent
Hanson	113	98.26%
13th Circuit	27	23.48%
Chris Hanson	27	23.48%
cahanson77@yahoo.com	25	21.74%
2025-CA-002469	2	1.74%
25-CA-10255	2	1.74%
Judge Kelly Ayers	2	1.74%
Judge Matthew Felix	2	1.74%
surveillance video	2	1.74%

Thank you,
Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square
720 SW 2nd Ave | North Tower, Suite 420
(352) 273-5039
<https://it.ufl.edu/>

How did we do? [Please rate our service.](#)

From: Hines,John <jkhines@ufl.edu>
Sent: Tuesday, March 31, 2026 12:19 PM
To: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Cc: Quillen,Amy <abquillen@ufl.edu>; Wood,Barbara L <blwood@ufl.edu>
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

When you have the chance, can you please provide the keyword chart for these results?

Thanks,
John

From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Sent: Monday, March 30, 2026 12:48 PM
To: Hines,John <jkhines@ufl.edu>
Cc: Quillen,Amy <abquillen@ufl.edu>; Wood,Barbara L <blwood@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Subject: RE: Public Records Request: W018463-032626 :: ISS-444193

Hello John,

This search concluded with 103 message(s), which resulted in 330 page(s). No attachments were included.

Location to download associated files:

<https://www.dropbox.com/scl/fo/tu7uror3harudqrs4hcf0/AlxizVgtUyiQQFN48zjHXI?rlkey=3d0hwgrpu5j6oicu8oug1ntks&st=qef3l4ls&dl=0>

Search Strategy for ISS-444193-W018463-032626

Mailboxes(2) to Search:

Cuillier,David
UFID: 97484080
GLID: cuillierd
Affiliation: T - STAFF
Department: 23040300-CJC-BRECHNER CENTER
Email: cuillierd@ufl.edu

From: UFIT-eDiscovery
Sent time: 05/07/2026 09:07:06 AM
To: Hines,John
Cc: Wood,Barbara L; Quillen,Amy; UFIT-eDiscovery
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi John,

No problem at all – here is the keyword chart from the original search as well:

Keyword	Message	Percent
Hanson	113	98.26%
13th Circuit	27	23.48%
Chris Hanson	27	23.48%
cahanson77@yahoo.com	25	21.74%
2025-CA-002469	2	1.74%
25-CA-10255	2	1.74%
Judge Kelly Ayers	2	1.74%
Judge Matthew Felix	2	1.74%
surveillance video	2	1.74%

Thank you,
Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square
720 SW 2nd Ave | North Tower, Suite 420
(352) 273-5039
<https://it.ufl.edu/>

How did we do? [Please rate our service.](#)

From: Hines,John <jkhines@ufl.edu>
Sent: Thursday, May 7, 2026 9:00 AM
To: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>; Quillen,Amy <abquillen@ufl.edu>
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi Daniel-

Can we have the keywords chart for both of the searches that were done for this one?

Sorry for the confusion, thanks!
John

From: UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Sent: Thursday, May 7, 2026 8:49 AM
To: Hines,John <jkhines@ufl.edu>
Cc: Wood,Barbara L <blwood@ufl.edu>; Quillen,Amy <abquillen@ufl.edu>; UFIT-eDiscovery <UFIT-eDiscovery@ad.ufl.edu>
Subject: RE: Inquiry on public records law and violations under Article 1 Section 24 of the constitution, rule 2.420, and chapter 119

Hi John,

Please see the keyword chart for this search below:

Keyword	Message	Percent
Hanson	18	100.00%
Chris Hanson	1	3.45%
cahanson77@yahoo.com	1	3.45%
13th Circuit	1	3.45%

Thank you,
Daniel Quiros
Cybersecurity Engineer
UF Information Technology
Ayers @ Innovation Square

PART J

UF Motion for Protective Order, Exhibit D: category-stamp boundary pages,
Category 1 to Category 2 and Category 2 to Category 3 (Doc. 006, pp. 84-85,
431-432)

From: cahanson77@yahoo.com <cahanson77@yahoo.com>

Sent: Thursday, March 12, 2026 10:51 AM

To: cjc-svc-brechner-report <brechnerreport@jou.ufl.edu>; Cuillier, David <cuillierd@ufl.edu>

Subject: Request for help and/or just for information relating to public records requests under Article 1 Section 24 of the constitution and rule 2.420

[External Email]

Good morning. I've called and left messages a few times. However, I just noticed that I had your email address wrong. I'm having trouble with the Florida Bar and the 13th Circuit Court concealing records that are obviously not exempt from production. They have confirmed the existence and I've paid for them, but they intentionally concealed and continue to conceal the target records. I have the matter in litigation. I believe there is significant judicial misconduct throughout this matter that demonstrates an apparent two-tier system of justice. I'm really hoping that the **Brechner Freedom of Information Project** will look at some of this information with an open mind and an understanding that this type of corruption within the judiciary is dangerous and must be investigated. Rather than overwhelm you with attachments, I think it would be more helpful if someone could speak to me about the case and determine if FAF is willing to get involved. Thank you.

Chris Hanson

FL Bar #44094

Phone: 727-409-5738

From: Bambauer, Jane
Sent time: 12/07/2024 10:53:01 PM
To: Ashutosh A Bhagwat <aabhagwat@ucdavis.edu>
Subject: Re: FEBRUARY 14, 2025: The Demand for Bullshit and How to Stop It

No worries. I understand entirely. See you at Eugene's thing!

Get [Outlook for Android](#)

From: Ashutosh A Bhagwat <aabhagwat@ucdavis.edu>
Sent: Saturday, December 7, 2024 5:49:34 PM
To: Bambauer, Jane <janebambauer@ufl.edu>
Subject: Re: FEBRUARY 14, 2025: The Demand for Bullshit and How to Stop It

[External Email]

Jane,

I apologize, but looking at my travel schedule and teaching load next spring (7 units), I've realized there is really no way I can manage to travel to Gainesville, given the travel time. I do hope you have a great conference; really sorry to miss it.

Ash
Ash Bhagwat
Distinguished Professor of Law and
Boochever and Bird Endowed Chair for the
Study and Teaching of Freedom and Equality
UC Davis School of Law
(530) 752-8687

Find my papers at:
<https://ssrn.com/author=193880>

From: Bambauer, Jane <janebambauer@ufl.edu>
Sent: Saturday, November 16, 2024 2:23 PM
To: Ashutosh A Bhagwat <aabhagwat@ucdavis.edu>
Cc: [REDACTED] <[REDACTED]@ufl.edu>
Subject: Fw: FEBRUARY 14, 2025: The Demand for Bullshit and How to Stop It

Ash,

So glad you might be able to come! See below...

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From: Bambauer, Jane <janebambauer@ufl.edu>
Sent: Saturday, November 16, 2024 2:17:05 PM
To: Coats, Janet <janetcoats@ufl.edu>; Shin,Jieun <jieun.shin@ufl.edu>; Inboden, William <inbodenw@ufl.edu>; Hutchens,Myiah <myiahhutchens@ufl.edu>; Lewis, Norman <nplewis@ufl.edu>; Carpenter, Nathan <nathancarpenter@ufl.edu>; Bridis,Theodore <tbridis@ufl.edu>; [REDACTED] <[REDACTED]>; Lidsky,Lyrisa <lidsky@law.ufl.edu>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Zach Weissmueller <zach.weissmueller@reason.com>; Yonathan Arbel <yarbel@law.ua.edu>; bwarmke@bgsu.edu <bwarmke@bgsu.edu>; ehinchman@fsu.edu <ehinchman@fsu.edu>; [REDACTED] <[REDACTED]@ufl.edu>; Jim Harper <[REDACTED]>; Robin D Hanson <rhanson@gmu.edu>; Bryan D Caplan <bcaplan@gmu.edu>; Agnes Callard <agcallard@uchicago.edu>; patrick@collision.ie <patrick@collision.ie>
Cc: [REDACTED] <[REDACTED]@ufl.edu>; Spiker, Ted <tspiker@ufl.edu>; McIlhenny, Ruth M. <ruthm@law.ufl.edu>; [REDACTED] E <[REDACTED]@ufl.edu>; Irvin, Cheryl <cherylirvin@ufl.edu>
Subject: FEBRUARY 14, 2025: The Demand for Bullshit and How to Stop It

Hello!

I am so pleased that you are interested in joining us at UF for our partially-rescheduled "Demand for Bullshit" conference on February 14th. (This conference, which was originally planned for late October, has now been smooshed in with the "...and what to do about it" conference.)

We have an unbelievable lineup of speakers, including a keynote lunchtime conversation with Agnes Callard (U Chicago) and Patrick Collison (Stripe/Stripe Press) about Agnes' new book *Open Socrates* and a happy hour keynote with The Fifth Column podcast. On top of this, we have Bryan Caplan, Robin Hanson, and most of the originally-scheduled speakers from the Demand for Bullshit conference. It's too much! Too many great people with interesting problems and great ideas.

Category 2

Reed Smith's Silence On Depo 'Speaks Volumes,' Ex-Atty Says

By Jake Maher

A former Reed Smith LLP attorney suing the firm for underpaying her based on her gender criticized the firm for its "inexcusable delay and attempted meandering" in seeking to resume deposing her years after her last deposition date.

 Brief attached | [Read full article »](#) | [Save to favorites »](#)

Beasley Allen Says NJ Justices Review Of Talc DQ 'Essential'

By George Woolston

Beasley Allen urged the New Jersey Supreme Court to hear its appeal of a lower court's decision to disqualify it from representing plaintiffs in multicounty litigation over Johnson & Johnson's talc-based baby powder, arguing that the court's immediate review of the interlocutory order is "essential."

 2 documents attached | [Read full article »](#) | [Save to favorites »](#)

U.S. Court of Appeals for the Eighth Circuit
U.S. Customs and Border Protection
U.S. Department of Commerce
U.S. Department of Defense
U.S. Department of Homeland Security
U.S. Department of Justice
U.S. District Court for the District of Columbia
U.S. District Court for the District of Delaware
U.S. District Court for the District of Maryland
U.S. District Court for the Eastern District of California
U.S. District Court for the Western District of Louisiana
U.S. Drug Enforcement Administration
U.S. Government Accountability Office
U.S. House of Representatives
U.S. Immigration and Customs Enforcement
U.S. Patent and Trademark Office
U.S. Senate
U.S. Supreme Court
US Office of Management and Budget

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From: Lisa Magness <[REDACTED]>

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To:

Cc: [REDACTED]; [REDACTED]; jason@digitalcontentnext.org; [REDACTED]; [REDACTED]; [REDACTED]

Subject: 911 EMERGENCY - I NEED SOMEONE IN AMERICA TO STOP DONALD TRUMP, ELON MUSK, AND RUSSIA FROM KILLING ALL OF US AND STALKING ME LIKE HUMAN PREY!

[External Email]

I find the ignorance that you dare to believe you, your families, or your businesses are safe in a Russian dictatorship profound. How could you possibly be safe when Nevada, Trump, Musk, Obama, Biden, Clinton, Bush, Miriam Adelson, Steve Wynn, Congress and the US Military are still trying to kill me some 9 YEARS LATER! Go ahead, I dare you to tell me what is so awesome about George W. Bush, Donald Trump, and Elon Musk's dicks that you are willing to die to save their Russian treason? Because you won't survive them. Any of them.

EVERY Governor, EVERY Mayor, EVERY City Council, EVERY politician, EVERY state legislature, EVERY former US President, and EVERY judge in America are killing us by the second in their desperate attempt to cover-up Russian treason. YET ignorant Americans are too ignorant to grasp it. Which is frightening as wholly hell! AMERICANS are being gaslit into oblivion by every state legislature and Washington DC and I am at a loss as to why we cannot seem to STOP THE INSANE, DEADLY CYCLE OF IT.

The Guthrie kidnapping WAS NO ACCIDENT. IT WAS RIGGED BY DC as a warning shot across the bow of the American media and press industry. To keep their mouths shut about our Russian dictatorship or Washington DC will escalate to murdering media and press figures and/or their family members. Therefore, Americans please pull your ignorant heads out of your ignorant asses before we all end up dead by Russia.

**You can find me at the following with substantial receipts:
Facebook @LisaLynnMagness
Twitter @USIdiotsAbound**

LISTEN THE INSANE IDEA THAT DONALD TRUMP IS GOING TO SPEAK WITH IRAN HAS GOT TO GO!!! AMERICA is not legitimate as a Russian dictatorship!!! FULL FUCKING STOP! So, Category 3

PART K

UF Motion for Protective Order, Exhibit D: unstamped text-message screenshot
page (Doc. 006, p. 333)

← hanson



1/1 result found



 Yonathan Arbel

Yonathan Arbel, AI will
take over our kayaks
worrier

 [Redacted]

Robin Hanson

 Katherine Marin

Attaching this waiver
form:
[https://mono.wherewol
f.co.nz/9f5be3](https://mono.wherewolf.co.nz/9f5be3)

It's for the kayaking
company.
Please fill out before



+ Text message



VERIFICATION OF COMPOSITE EXHIBIT 1

(Section 92.525, Florida Statutes)

Hanson v. University of Florida Board of Trustees,
Case No. 01-2026-CA-001794 (Fla. 8th Jud. Cir.)

Under penalties of perjury, I declare that I have read the foregoing Composite Exhibit 1, including its index, and that the facts stated in the index are true. Parts A through F are true and correct copies of email correspondence as sent or received by me on the dates indicated. Parts G through I are true and correct copies of pages from the University of Florida's production in response to public records request W018964-060526, as received. Parts J and K are true and correct copies of pages from Exhibit D to the University's Motion for Protective Order as filed July 30, 2026.

Executed on July 31, 2026.

/s/ Christopher A. Hanson
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727-409-5738
Self-represented Petitioner