

**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.

**NOTICE OF FILING DISCOVERY SERVED JULY 13, 2026,
WITH TRANSMITTAL**

PLEASE TAKE NOTICE that Petitioner files the following, each a true and correct copy of the document as served, for use at the August 24, 2026 Case Management Conference, at which the Court will hear Respondents' Motion for Protective Order directed to this discovery and Petitioner's Cross-Motion to Set an Expedited Evidentiary Schedule:

1. Transmittal e-mail of July 13, 2026, 1:57 PM, from Petitioner to Respondents' counsel, whose attachment list identifies each document below by file name (2 pages);
2. Petitioner's First Set of Interrogatories to Respondents (3 pages);
3. Petitioner's First Requests for Admission to Respondents (3 pages);
4. Petitioner's First Request to Produce to Respondents (3 pages);
5. Petitioner's Public Records Request No. 2 to the University, served with the same transmittal (2 pages).

The interrogatories, requests for admission, and requests for production are filed because they are used in a proceeding: they are the subject of Respondents' pending Motion for Protective Order, and Respondents themselves filed copies as Composite Exhibit A to that motion (Docket 006, July 30, 2026). Responses to the attached discovery were due August 12, 2026. As of the date of this filing, no answers, objections, or responses have been served.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing, with its attachments, was served by the Florida Courts E-Filing Portal on August 24, 2026, on James W. Kirkconnell, Esq. (jameswk@ufl.edu) and Kristen LoGiurato (klogiurato@ufl.edu), Attorneys for Respondents.

/s/ Christopher A. Hanson
Christopher A. Hanson, Esq., Florida Bar No. 44094
Petitioner, pro se, and as attorney and next friend
for his two minor children
cahanson77@yahoo.com | 727-409-5738

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

To: christophhanson77@gmail.com; universityofflorida@mycusthelp.net; jameswk@ufl.edu

Date: Monday, July 13, 2026 at 01:57 PM EDT

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



PRR 2 TO UF.pdf
99.6



Rogs to UF.pdf
101.1



RFAS to UF.pdf
123



RTP to UF.pdf
122.9

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
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individually and as attorney for
himself and next friend and attorney
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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.

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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.

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individually and as attorney for
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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.

July 13, 2026

James W. Kirkconnell, Esq.

Counsel for the University of Florida

jameswk@ufl.edu

RE: Transmittal, through counsel, of a public records request to the University of Florida under Chapter 119, Florida Statutes, and Article I, Section 24, Florida Constitution — records of the search and processing of Request No. W018463-032626

Dear Mr. Kirkconnell:

Because the University is represented in the pending action and the subject of this request overlaps it, I am directing this new public records request to the University through you, as its counsel of record, rather than to its records custodian directly, and I ask that you transmit it to the appropriate custodian upon receipt. This is a request under Chapter 119, Florida Statutes, and Article I, Section 24(a) of the Florida Constitution; it stands on the statutory right of access, independent of the pending action and of any question concerning the availability or timing of discovery there. The University may respond through you or through its custodian channel, at its option.

Under Chapter 119, Florida Statutes, and Article I, Section 24(a) of the Florida Constitution, Petitioner requests the following records of the University of Florida:

1. **The search outputs for Request No. W018463-032626:** the hit list(s), result list(s), export(s), or equivalent output generated by UFIT when it "gathered over 470 pages of documents" responsive to the request — in native format, with associated metadata.
2. **Records sufficient to show, for each search term used in processing that request:** the term as actually run; the date(s) it was run; the systems, repositories, and mailboxes searched; and the number of items or pages returned.
3. **Any index, log, inventory, or tracking record of the gathered pages,** including any record identifying which pages were produced and which were not, and on what basis — as such records exist; this item does not ask the University to create a record.
4. **The May 4, 2026 delivery package** for Request No. W018463-032626 as maintained by the University (the transmittal and its attachments), sufficient to confirm the contents and page count of what was produced.
5. **The University's current policies, procedures, or guidance** governing the processing of public records requests, including search methodology and review for exempt or non-record

material, and the applicable retention schedule(s) for search outputs and request-processing records.

6. If no responsive record exists for any item above: a written statement saying so as to each item individually.

If access to any responsive record is denied in whole or in part, please state the basis of the denial with particularity, including the specific exemption claimed and its factual basis, as Section 119.07(1)(e), Florida Statutes, requires, and produce all non-exempt portions. Effective immediately, I also demand preservation of all records described above, on every system and backup where they reside, with any automatic deletion or overwriting suspended.

Please acknowledge receipt and provide the records, or the written responses required above, promptly and in good faith. If fees apply, provide an itemized estimate before incurring them. Please direct all responses to cahanson77@yahoo.com.

Respectfully,

Christopher A. Hanson, Esq.

Florida Bar No. 44094

cahanson77@yahoo.com · 727-409-5738