

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT

IN AND FOR ALACHUA COUNTY, FLORIDA

CASE NO.: 01-2026-CA-001794

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

Petitioners,

v.

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

Respondents.

PETITIONER'S MOTION FOR ENTRY OF A WRITTEN ORDER ESTABLISHING THE PROCEDURE FOR THE IN CAMERA INSPECTION, FOR IDENTIFICATION OF THE SUBMITTED AND OMITTED RECORDS, AND FOR FORMAL WRITTEN ORDERS ON THE PENDING MOTIONS, INCLUDING THOSE RULED ON ORALLY ON AUGUST 24, 2026

Petitioner Christopher A. Hanson, self-represented, moves for entry of a written order establishing the procedure for the in camera inspection the Court directed on September 2, 2026, and governing any further submission. As Respondents' own office described the ruling, it reaches "all documents located by the University in fulfilling public records request W018463, including all non-responsive records." That is Request No. W018463-032626, submitted March 26, 2026. Counsel's transmittal reports six files totaling 538 pages. It lists no file of 621 pages and does not mention the April 24, 2026 delivery that the University's own processing file records: "the 621 pages received from UFIT on 04/24/26." August 28 Processing File at 273 (Wood to Quillen and Hines, May 7, 2026, 10:28 a.m.). The August 28 Processing File is the University's own request-processing production for Request No. W018463-032626, filed by

Petitioner on August 28, 2026 (Filing 255904665, 741 pages). Petitioner asks that Respondents identify what they submitted and account for what they did not, and states:

I. The oral order and what followed

1. The evidentiary hearing was held by Zoom on September 2, 2026, beginning at 9:00 a.m. No written order has been entered describing the production or the process for the in camera review. The September 2 transcript has been ordered and not yet delivered.
2. Beyond the five-day timeline discussed at the hearing, Petitioner was not on the line for any discussion of how the in camera production would be made. When Petitioner asked that the materials produced be accompanied by sworn and independent electronic confirmation that they match the materials identified in Respondents' own records, Petitioner's connection to the Zoom hearing ended. He does not know whether or how long the hearing continued without him.
3. On September 2 at 12:35 p.m., Respondents' legal assistant described the required production to the judicial assistant as reaching "all documents located by the University in fulfilling public records request W018463, including all non-responsive records." Respondents asked whether the Court preferred electronic or paper delivery.
4. Also on September 2, 2026, at 1:34 p.m., Petitioner asked that the submission identify each record by date and author and tie each record to the batches in the University's own processing file. At 2:02 p.m. the judicial assistant wrote to both parties that electronic delivery "will be ok since it was ordered to be completed within 5 days." Five days from September 2 is Tuesday, September 8, 2026. Fla. R. Gen. Prac. & Jud. Admin. 2.514(a)(1)(C), (a)(6).

5. Later on September 2, 2026, counsel emailed the submission to chambers without copying Petitioner. The transmittal states: "These records contain some exempt information and are intended for an in camera review only; therefore, Mr. Hanson has not been included on this correspondence. I would respectfully request that you copy Mr. Hanson when you confirm receipt (while omitting attached files) so that he is aware that the documents have been delivered."
6. Respondents' counsel attached it to an email to Petitioner the following day at 4:32 p.m. By then Petitioner had transmitted the proposed Order on In Camera Inspection through the e-filing portal at 8:16 a.m. on September 3 (Filing 256318669), with a cover email to chambers and counsel at 8:29 a.m.
7. Petitioner maintains that the proposed order, transmitted less than 24 hours after the hearing began, contains the bare minimum necessary for compliance given the delays and inconsistencies in Respondents' handling. That proposed order is Exhibit 2. Paragraphs (a) through (g) below request the relief it provides.
8. Counsel for the University "does not agree to" the proposed order, "nor does the University agree to a 'Motion to Establish Protocol for In Camera Inspection.'"
9. Counsel's September 3 email, with the transmittal and inventory it attached, is Exhibit 1.
10. On September 4, 2026, after the judicial assistant confirmed that the Court had received the documents, Petitioner filed a Notice of Objection to the In Camera Submission as Delivered (Filing 256489625).
11. Petitioner objected to the absence of certification at each stage, without waiting for a ruling. During the hearing itself, before any documents were produced, he asked that the production be accompanied by sworn and independent confirmation that the materials matched

Respondents' own records (paragraph 2). Before Respondents emailed the submission to chambers, he asked in writing that each record be identified and tied to the University's processing file (paragraph 4).

12. Respondents delivered the documents to chambers without copying Petitioner (paragraph 5).
13. When Petitioner transmitted his proposed order at 8:16 a.m. on September 3, 2026 (paragraph 6), he had received no notice from the Court or its staff that the documents had arrived.
14. Petitioner learned of the delivery only later that day, from counsel's September 3, 2026 email at 4:32 p.m. (paragraph 6). The judicial assistant did not confirm to the parties that the Court had received the documents until the following day, September 4, 2026 at 11:54 a.m. (Notice of Objection ¶ 3, Filing 256489625).
15. Petitioner filed the Notice of Objection later that day, September 4, 2026. Nothing in the record shows that the Court had reviewed the documents or acted on the submission before he did.

II. What the submission contains and what it omits, by the University's own inventory

16. Counsel's transmittal lists six files described as "the files forwarded to the public records office as part of fulfilling this request," with page counts of 10, 330, 106, 3, 88, and 1. Total: 538 pages. It contains no index below the file level as to the source of the files.
17. The University's processing file, the August 28 Processing File, records a delivery the transmittal does not list.
18. On May 7, 2026 at 10:28 a.m., the University's legal assistant wrote to Associate Counsel Quillen and the records custodian: "In addition to the 621 pages received from UFIT on 04/24/26, I am in receipt of additional potentially responsive records (88 PAGES) from UFIT

(05/07/26)." August 28 Processing File at 273; the same email appears at August 28 Processing File at 652-653.

19. An 88-page file is listed in the submission, but nothing documents that it is the same file segregated at Associate Counsel Quillen's instruction on May 7, 2026: "can you pull out the results with the search terms 13th Circuit, 2025-CA-002469, 25-CA-10255, Judge Kelly Ayers, Judge Matthew Felix, and surveillance video? If yes, please provide those results as a separate pdf." August 28 Processing File at 653.
20. The 621-page file is not listed at all.
21. The transmittal also lists no record of the review at which the University decided what to release. Respondents have sworn that this review is where located records were sorted: "I worked with UFIT and UF's legal department to parse through the 470+ pages. Of these, some records did not meet the definition of public records, while others concerned individuals having the surname Hanson, but with no relation to the Petitioner." Hines Aff. ¶ 7 (Exhibit A to Respondents' July 7, 2026 Response to the Order to Show Cause, Filing 251907242, cited as Resp.).
22. Nothing in the record identifies which records were placed in either category, when, or on what basis.
23. The University told Petitioner on May 5, 2026: "all located records incurred a legal review in order to determine responsiveness and the potential exempt nature of information in the records." Resp. p. 4 (quoting Petitioner's appendix to the petition at App. 76). Those are the records of the basis for withholding, which the request and sections 119.07(1)(e) and (1)(f), Florida Statutes, reach; the transmittal lists none.

24. The transmittal carries no certification of completeness, no index of the pages, and no statement of chain of custody. The Response states: "All of the records responsive to Petitioner's request were produced in their entirety." Resp. p. 9. The transmittal states that the records "contain some exempt information."

III. Identification is a constitutional and statutory duty and the Court's inspection function, not discovery

25. Article I, section 24(a) of the Florida Constitution guarantees every person the right to inspect or copy any public record not exempted under that section; the section is self-executing. Art. I, § 24(c), Fla. Const.

26. The agency that claims an exemption bears the burden of proving it. *Weeks v. Golden*, 764 So. 2d 633, 635 (Fla. 1st DCA 2000) ("The burden was on the State Attorney to demonstrate entitlement to an exemption."). Section 119.07(1)(e), Florida Statutes, requires a custodian who contends a record is exempt to "state the basis of the exemption ... including the statutory citation."

27. Beyond that, section 119.07(1)(f) requires, on request, a written statement of the reasons "with particularity."

28. Petitioner so requested on March 26, 2026: "For any withheld record, please provide a log identifying the date, author, recipient, and general subject matter." August 28 Processing File at 7. Respondents' transmittal to chambers states that the records "contain some exempt information." That is the contention that triggers both subsections. No basis and no citation have followed it.

29. The in camera inspection exists "to decide whether there are sufficient reasons not to release" the information, and it is the "always better practice" because it "provides a much better basis for appellate review." *Tribune Co. v. Public Records*, 493 So. 2d 480, 484 (Fla. 2d DCA