

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

CASE NO.: 01-2026-CA-001794

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

Petitioners,

v.

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

Respondents.

PETITIONER'S CLOSING ARGUMENT AND LEGAL BRIEF

Citations. "Tr." is the certified transcript of the September 2, 2026 evidentiary hearing, filed as Exhibit E to Petitioner's Notice of Filing Exhibits (September 14, 2026, Filing 256954496); "8/24 Tr." is the certified transcript of the August 24, 2026 hearing, Exhibit A to the same filing. "App." is the Appendix to the Verified Petition (docketed June 19, 2026 as Notice of Filing Appendix A-G, 81 pages), cited by its own page stamp. "Pet. Ex." is Petitioner's hearing exhibit composite (docketed August 31, 2026 as Exhibits to be Considered at Hearing, 287 pages, Filing 256010215). "Resp. Ex." is Respondents' Exhibit List with its exhibits attached (docketed August 31, 2026 as Exhibit List, 189 pages, Filing 256089009); "packet p." is the page of that filing as docketed. "Ex. K" is the University's 741-page processing file for this request (docketed August 28, 2026 as Petitioner's Notice of Filing, Filing 255904665), cited by its own page. "Aff." is the affidavit of records custodian John Hines, Exhibit A to Respondents' Response (docketed July 7, 2026, 17 pages, Filing 251907242). "Filing" numbers are Florida Courts E-Filing Portal numbers as shown on the docket.

Preliminary statement

1. On March 26, 2026, Petitioner asked the University of Florida for its records concerning various matters in litigation, held by the Brechner Freedom of Information Project and by Dr. David Cuillier and Professor Jane Bambauer.

2. Petitioner specifically asked that any exemption be stated in writing with the statutory citation and a log of every withheld record. Pet. Ex. A, App. 4-5. The right invoked is constitutional and self-executing. Art. I, ¶ 24(a), (c), Fla. Const.

3. The burden of justifying nondisclosure is the custodian's. *Weeks v. Golden*, 764 So. 2d 633, 635 (Fla. 1st DCA 2000).

4. Within four days the University's IT unit had located 340 pages. Resp. Ex. I, packet p. 90.

5. Yet, four weeks later the portal told Petitioner only that his request was "undergoing the legal review." App. 11. On May 4, 2026, the University produced 53 pages, all of them Petitioner's own emails to University personnel, and wrote: "This completes the public records request." App. 14-15.

6. On May 5 it wrote that "No exempt information was withheld or redacted from the records responsive to your request." App. 76. It failed to acknowledge that any other documents were located and has never said what became of these other pages that Petitioner only learned about through this litigation.

7. Petitioner sued. The Court found the petition facially sufficient and ordered Respondents to show cause in writing on June 12, 2026. Filing 250268011. Respondents answered July 7 with the affidavit of records custodian John Hines, which swore that IT had "gathered over 470 pages" and that the pages not produced "did not meet the definition of public records" or "concerned individuals having the surname Hanson." Aff. ¶¶ 6-7. On July 30 the University filed 426 of those pages on the public docket, attached to a motion to bar all discovery, under a footnote stating that they "have been redacted pursuant to" three statutes. Filing 253616687 ¶ 24 & n.4.

8. Petitioner served written discovery on July 13 and noticed the custodian's deposition for August 3. Neither the custodian nor Respondents' counsel appeared, and the discovery was never answered. Filing 253756192 ¶¶ 91, 96; Filing 256954496, Ex. G.

9. On August 24 the Court announced from the bench that it would grant the protective order, "outside the scope" (Aug. 24, 2026 Tr. 36:9-11);

10. No written order has been entered. The final hearing was set to take place eight days later, on September 2, 2026 despite Petitioner's request for additional time.

11. On September 2 the Court heard some of the evidence. Asked what happened to the 340 pages his office located on March 30, 2026, the custodian answered: "I don't know." Tr. 99:3-5. "I did not read the 340 pages." Tr. 100:5-6. He does not perform the searches, does not watch them performed, and does not make the production decision. Tr. 129:19-20; 130:3-6, 16-18, 23-24. The person who ran the searches (Mr. Quiros) was subpoenaed and did not appear. Filing 256949636. Asked whether the University asserted any exemptions, the custodian answered: "No." Tr. 121:17-19.

12. The Court ordered every withheld page delivered for in camera inspection, "all redundancy, every page accounted for." Tr. 134:14-21; 135:10-12. The same afternoon Respondents' counsel emailed chambers what he described as six record files totaling 538 pages, without copying Petitioner. Filing 256513029 ¶ 16. The description and the page counts are counsel's. No custodian has certified what the files contain or that nothing is missing. Petitioner has never seen them.

13. Petitioner submits this closing argument within the fifteen days and twenty pages the Court allowed, Tr. 134:11-13, and subject to the reservations in Part IV. He cannot argue what the records in chambers are, because Respondents have never made the identification that sections 119.07(1)(e) and (1)(f), Florida Statutes, and the cases applying them require.

14. Petitioner requests an order that puts every page that the University's own file says it located before the Court, certified complete and indexed, together with the written identification that sections 119.07(1)(e) and (1)(f), Florida Statutes, require, served before any

finding of compliance, so that the finding rests on evidence rather than on counsel's information, compilation, and assurances.

I. What the September 2 hearing established

15. The University's processing file records what its IT unit (UFIT) delivered into this request: March 30, 2026, 330 pages excluding attachments, plus 10 pages (Resp. Ex. I, packet p. 90); April 24, 621 pages "received from UFIT," logged inside this request's own file (Ex. K at 273), which Mr. Hines testified belong to a different request, W018643 as transcribed (Tr. 105:25 to 106:2); May 4, a rerun of 109 pages and 17 messages the first search missed (Resp. Ex. N; Ex. K at 129, 273); and May 7, 88 pages (Ex. K at 273). Petitioner seeks no record of another request, only a mapping of what is logged in this file. The affidavit says UFIT "gathered over 470 pages" (Aff. ¶ 6); Exhibit D to the July 30 motion contains 479 (Filing 253616687 ¶ 24); the September 2 submission contains 538.

16. "What happened to those 340 pages after this March 30th e-mail? A I don't know." Tr. 99:3-5. "I don't know. I did not read the 340 pages." Tr. 100:5-6. "Q So, these 88 pages are somewhere on the U-Drive? A Yes." Tr. 108:20-22. On April 3, 2026, Mr. Hines himself had asked Associate General Counsel Amy Quillen: "Did you want me to provide the chart below to the requestor or did you want to invoice for the 340 pages?" Answer: "I think very little of this may be responsive, so no invoice for now." Resp. Ex. J, packet p. 94. That exchange is the only decision about those pages that appears anywhere in this record, and it identifies none of them.

17. "Is it you that makes the decision of whether to include documents of the public records or that's the attorneys? A Not me." Tr. 130:3-6. "Sir, do you make the decisions on what to produce versus what not to produce? A No." Tr. 130:16-18. He neither performs searches nor watches them performed. Tr. 129:19-20; 130:23-24. The person who ran the searches, Daniel Quiros of UFIT, was personally served with a subpoena for his appearance at the September 2, 2026 hearing and did not appear; Respondents had written on August 26 that the University "will present the testimony of its Records Custodian, John Hines, at the Hearing" and "does not agree

to accept service of process for any other witness for the Hearing." Kirkconnell email, Aug. 26, 2026, 2:26 p.m. (Filing 256954496, Ex. H); Witness List, Filing 256048920 ¶ 1.c; return of service at Filing 256949636, Ex. C.

18. Petitioner's motion to reopen the evidence for Mr. Quiros's testimony (Filing 256949636) is pending.

19. The only records the University has ever produced are the ones its two witnesses forwarded from their own inboxes. Dr. Cuillier forwarded "the e-mail chain that we had, which are the only responsive records," on March 30 at noon, "less than a half hour" after being asked. Tr. 23:10-12; 32:7-10. Professor Bambauer sent "what I had." Tr. 85:9-11.

20. The May 4 production is those forwards and nothing else: a 50-page chain between Petitioner and Dr. Cuillier (W018463-1.pdf) and Petitioner's three-page March 25 email to Professor Bambauer (W018463-2.pdf), 53 pages, all of them Petitioner's own correspondence. Pet. Ex. B, App. 12-65; Filing 253616687, Ex. D, Category 1. The 340 pages the IT unit located the same morning were never produced (paragraph 16). Dr. Cuillier's own summary carries the qualifier that makes it true: "there are no records in the world in existence regarding your case, the case numbers, your Judges, and me that I have produced, there are none, other than those e-mails that you were provided." Tr. 40:15-22. He does not know what IT gathered or what the search entailed. Tr. 40:15-17. Nothing in the September 2 submission, described only by IT batch sizes of 10, 330, 106, 3, 88, and 1, is identified as either forward or as the 53 pages produced.

21. At the September 2, 2026 hearing, the Court sustained 16 of the 17 objections Respondents' counsel made to questions about the University's own documents or its own search. Filing 256954496, Ex. F. The thinness of the record on where those pages went is not for want of asking.

22. No record, pleading, or testimony in this case identifies any particular located record as withheld or redacted, or states the basis for withholding that record. On May 7 the

Office of General Counsel's legal assistant wrote that newly received pages were copied to the U: drive "to be reviewed by the General Counsel and for approval to be released." Ex. K at 273.

23. Mr. Hines read its May 4, 2026, 10:40 a.m. email (Ex. K at 129) into the record on Respondents' examination: "it appears that our search tool stalled before completing the search of Professor Bambauer's mailbox. After March 9th, 2026, no further e-mails 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." Tr. 115:24 to 116:10; Resp. Ex. N, packet p. 109.

24. At 3:22 p.m. that day the University produced 53 pages and wrote, "This completes the public records request." Pet. Ex. B, App. 14-15. Asked how he knows the search was completed, Mr. Hines answered, "It's IT's job to complete searches." Tr. 131:8-10.

25. On Respondents' examination the custodian summarized the University's May 5 letter and testified about the 479 pages of Exhibit D. Tr. 122:15-24; 127:2-3. On the same examination he testified that he does not perform searches, does not watch them performed, does not make the production decision, and does not see the legal review. Tr. 129:19-20; 130:3-6, 16-18, 23-24.

26. The University has described the exempt content of the located records four ways. On May 5, 2026: "No exempt information was withheld or redacted from the records responsive to your request." Pet. Ex. D, App. 76 (the same letter is Resp. Ex. R). Under oath: "Q Did the University of Florida assert any exemptions? A No." Tr. 121:17-19. In its July 30 motion: the category (2) records "have been redacted pursuant to" 20 U.S.C. § 1232g, section 1006.52, and section 119.071(5)(b). Filing 253616687 ¶ 24 n.4. In transmitting the in camera submission: the records "contain some exempt information." Filing 256513029 ¶ 5 (quoting the September 2 transmittal). Which particular records were redacted, and under which of the three statutes, is stated nowhere. Respondents have never explained the different answers to the same question.

27. The "legal review" that held the request for weeks is undescribed by anyone. On April 23, 2026, four weeks after the request and with 340 pages in hand, the portal told Petitioner: "Your request is undergoing the legal review." App. 11 (Pet. Ex. R). The same day Associate General Counsel Quillen instructed Mr. Hines: "You can let him know that his request is undergoing the legal review." Ex. K at 68. Under oath: "The attorneys handle the legal review of public records request, I'm not an attorney." Tr. 99:7-8.

28. The custodian does not make the production decision (paragraph 17). Measured against what it produced, the review sorted the located pages into the three categories the University filed on July 30: the 53 pages of Petitioner's own correspondence, produced May 4 (App. 14-15); 249 pages the University describes as records that "relate to individuals who are not you, but have the same last name" (Filing 253616687 ¶¶ 12-14, 24; App. 74); and 177 pages it calls "documents which were not public records" (Filing 253616687 ¶¶ 11, 24).

29. By the University's own affidavit that sorting was complete before the May 4 production. Aff. ¶¶ 7-8. It does not take weeks. And after it, the University filed those 426 pages on the public docket under a footnote stating they "have been redacted" under three statutes (Filing 253616687 ¶ 24 n.4), while pages among them carry non-parties' unredacted personal data, including a residential address. Filing 256010098 ¶¶ 81-82 (identifying the pages and asking that they be sealed; Petitioner does not reproduce the data here). None of it is Petitioner's information. And on May 7, 2026, Associate General Counsel Quillen asked UFIT to "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" and to "provide those results as a separate pdf." Ex. K at 238. That file, 88 pages, was copied to a drive "to be reviewed by the General Counsel." Ex. K at 273. Counsel segregated the records about Petitioner's cases and judges into their own file and produced none of them.

II. The one ask: the written statement sections 119.07(1)(e) and (1)(f) require

30. "Every person has the right to inspect or copy any public record made or received in connection with the official business of any public body, officer, or employee of the state, or

persons acting on their behalf, except with respect to records exempted pursuant to this section or specifically made confidential by this Constitution." Art. I, § 24(a), Fla. Const.

31. The right is self-executing. Art. I, § 24(c). Access is the rule, withholding the exception: the Act is construed liberally in favor of openness and exemptions narrowly, limited to their designated purpose. *Bd. of Trs., Jacksonville Police & Fire Pension Fund v. Lee*, 189 So. 3d 120, 125 (Fla. 2016). *Weeks*, 764 So. 2d at 635 ("The burden was on the State Attorney to demonstrate entitlement to an exemption."); *Bent v. State*, 46 So. 3d 1047, 1049 (Fla. 4th DCA 2010) (whether a record is a public record is a question of law, determined case by case).

32. The Court's June 12, 2026 Order to Show Cause found the petition "facially sufficient" and ordered Respondents "to show cause in writing why a peremptory writ should not issue." Filing 250268011 at 1. "Once an alternative writ has issued, the burden is on the respondent to come forth with facts upon which it refused to perform its legal duty." *Chandler v. City of Greenacres*, 140 So. 3d 1080, 1083 (Fla. 4th DCA 2014) (quoting *Smith v. State*, 696 So. 2d 814, 816 (Fla. 2d DCA 1997)). Section 119.11 sets the hearing's priority. It does not shift the constitutional burden of justifying nondisclosure, which *Weeks* places on the custodian. Compare Tr. 7:11-14.

33. The Court's Order to Show Cause occupies the position of the alternative writ here. It found the petition facially sufficient and required Respondents to show cause in writing, addressing "all issues contained in the petition." Filing 250268011. On that order the return "becomes in all respects the complaint," and "[i]f the respondent does not meet this burden in the return, then no trial is necessary." *Holcomb v. Dep't of Corrections*, 609 So. 2d 751, 753 (Fla. 1st DCA 1992).

34. The law "places a specific burden upon the municipality to come forward with exact facts." *Bal Harbour Village v. State ex rel. Giblin*, 299 So. 2d 611, 615 (Fla. 3d DCA 1974).

35. A custodian who contends that a record is exempt "shall state the basis of the exemption," "including the statutory citation." § 119.07(1)(e), Fla. Stat. If the requester asks, the custodian shall state the reasons "in writing and with particularity." § 119.07(1)(f).

36. Petitioner asked the custodian in writing before suit, twice: in the request itself ("you must state the basis for the exemption in writing, citing the specific statutory exemption," with a log of "date, author, recipient, and general subject matter," Pet. Ex. A, App. 4-5) and in the May 4 letter (Pet. Ex. C, App. 67-71). He renewed it in this proceeding on July 13 (Pet. Ex. J), September 3 (Filing 256318669), and September 7 (Filing 256513029).

37. The First District has held: "Thus, section 119.07(1)(e) plainly requires only record-by-record — not redaction-by-redaction — identification of the exemptions authorizing the redactions in each record." *Jones v. Miami Herald Media Co.*, 198 So. 3d 1143, 1146 (Fla. 1st DCA 2016). Jones reversed an order requiring more; Petitioner asks for what Jones holds the statute requires, and no more. Judge Ray, concurring: "An agency is required to provide a record-by-record identification of claimed exemptions, and, upon request, must state in writing and with particularity the reasons for its conclusion that a record is exempt." *Id.* at 1147 (Ray, J., concurring).

38. The University has not identified any particular record withheld or redacted, or the basis for withholding it.

39. Subsections (1)(e) and (1)(f) apply here on the University's own words. Its July 30 motion states that category (2) records "have been redacted pursuant to" three statutes, and its September 2 transmittal states that the records sent to chambers "contain some exempt information" (paragraph 26).

40. A custodian that has redacted on those grounds owes the record-by-record statement by operation of law. For records withheld as "not public records" or "not responsive," no statute supplies the form, but the burden does: Respondents must "come forth with facts" (*Chandler*, 140 So. 3d at 1083), whether a record is a public record is a question of law for the Court (*Bent*, 46 So. 3d at 1049), and a return that does not identify the records it withholds

cannot carry that burden (*Holcomb*, 609 So. 2d at 753; *Weeks*, 764 So. 2d at 634-35). The Court can decide the status of a record only after someone has said what the record is.

41. The affidavit's other grounds, that some records "did not meet the definition of public records" and others "concerned individuals having the surname Hanson" (Aff. para. 7), are questions of law the Court determines case by case, *Bent*, 46 So. 3d at 1049 (Reply para. 34), and the Court can determine them only for records that have been identified.

42. Petitioner asked for the in camera inspection at the hearing (Tr. 104:4-17) and the Court ordered it (Tr. 134:14-21). Where exemptions are claimed or doubt exists, "the proper procedure is to furnish the document to the trial judge for an in camera inspection." *Walton v. Dugger*, 634 So. 2d 1059, 1061-62 (Fla. 1993); accord *Environmental Turf, Inc. v. Univ. of Fla. Bd. of Trs.*, 83 So. 3d 1012, 1013 (Fla. 1st DCA 2012) (in camera inspection is "generally the only way for a trial court to determine whether or not a claim of exemption applies") (quoting *Garrison v. Bailey*, 4 So. 3d 683, 684 (Fla. 1st DCA 2009)). Inspection answers what is in the submission. It cannot answer what is missing from it, or why any located page was not produced.

43. Only the custodian can state that, and sections 119.07(1)(e) and (1)(f) say he must state it in writing. Where a response fails to identify with specificity the reasons and statutory basis for withholding, the remedy is an amended response that does. *Weeks*, 764 So. 2d at 634-35. The Court's own standard: "All redundancy, every page accounted for." Tr. 135:10-12.

44. The submission in chambers arrived on Respondents' terms. At 12:35 p.m. on September 2, Respondents' office described the Court's direction to the judicial assistant as reaching "all documents located by the University in fulfilling public records request W018463, including all non-responsive records." Filing 256513029 ¶ 3 and Ex. 1 (filing p. 20). Petitioner asks that Respondents be held to that description with certification and supporting documentation.

45. On its terms, the 621 pages the University's own file records as "received from UFIT on 04/24/26" (Ex. K at 273) are located documents and are within the order whether or not the University now calls them responsive to another request; the submission as delivered does

not account for them. At 1:34 p.m. Petitioner asked, in writing, that the submission identify how the files "relate back to the various batches, folders, and files described in UF's own materials." Ex. 1 (filing pp. 19, 23).

46. Respondents did not answer that request before delivering the submission to chambers that afternoon. Shortly after 2:00 p.m. the judicial assistant told both parties that electronic delivery "will be ok since it was ordered to be completed within 5 days." Filing 256513029 ¶ 4 and Ex. 1 (filing p. 18). The files went to chambers without a copy to Petitioner, described by counsel as six files with page counts of 10, 330, 106, 3, 88, and 1, totaling 538, each labeled only by the email that transmitted the batch.

47. There is no index below the file level, no identification of any document within any file, no custodian's certification, and no chain of custody. Filing 256513029 ¶¶ 16, 24 and Ex. 1 (filing pp. 21-22). As of this filing, Petitioner's proposed protocol order (Filing 256318669) and his Notice of Objection (Filing 256489625) have not been ruled on.

48. The accelerated hearing that section 119.11(1) requires exists for the requester: "the court shall set an immediate hearing, giving the case priority over other pending cases." It is not a device for closing the record before the custodian has stated, in writing, what he withheld and why.

49. The statement asked for here is the custodian's own statutory duty, owed to the requester before any suit was filed. It is not discovery. The University offered the in camera review itself (Response p. 3 n.5). The order asked for does not reach into the review. It puts every page the University's own file says it located in front of the Court, with a custodian's certification that nothing is missing and an index that says what each page is, and it requires the statement of which records were withheld from Petitioner and why.

50. The authority requiring Respondents' to identify with particularity any exempt documents rests on sections 119.07(1)(e) and (1)(f). The completeness order rests on the Court's authority to determine compliance under sections 119.11(1) and 119.07(1)(g), measured against

the standard the Court stated for the submission, "all redundancy, every page accounted for" (Tr. 135:10-12), and against Respondents' own description of what the order reaches (paragraph 44).

51. On this record no final determination of compliance can be made until the identification the statute requires is in writing and the parties can address the inspected record. If the Court rules now, the burden decides it. Respondents had to show that every located record was produced or lawfully withheld. The custodian could not say what the 340 pages are, does not decide what is produced, and cannot see the review; the IT email records a stalled search that no witness with personal knowledge said was completed; no writing identifies any withheld record or the basis for withholding it. The University did not carry its burden, and production of every located record not shown exempt follows.

III. The filed record, incorporated

52. Petitioner incorporates by reference, in date order: the Verified Petition and Appendix (June 4, 2026, Filing 249635041); the Order to Show Cause (June 12); Respondents' Response and the Hines affidavit (July 7, Filing 251907242); the Reply (July 14, Filing 252419965); Respondents' Motion for Protective Order with Exhibit D (July 30, Filing 253616687); the Combined Response and Cross-Motion (July 31, Filing 253756192); the Notice of Filing of Ex. K (August 28, Filing 255904665); the Combined Motion (August 31, Filing 256010098), Sections III to VII, for their statement of the record and the law; the Hearing Memorandum (August 31, Filing 256049173); the Notice of Objection to the in camera submission as delivered (September 4, Filing 256489625); and the Motion for Entry of Written Orders (September 7, Filing 256513029), as corrected by Petitioner's Errata filed September 14, 2026 (Filing 256994676); the Notice of Filing Exhibits to the Verified Motion to Disqualify (September 14, 2026, Filing 256954496), for the certified transcripts of the August 24 and September 2, 2026 hearings at Exhibits A and E; and the Verified Motion for an Order to Show Cause (September 14, 2026, Filing 256949636), for the subpoena to Daniel Quiros and its return at Exhibits B and C. The requests in the earlier motions are not abandoned nor argued here; the relief sought on this record is in Section V.

IV. Reservations

53. This brief is submitted without waiver of Petitioner's pending Verified Motion to Disqualify Trial Judge under Rule 2.330 (September 13, 2026, Filing 256936128), which Rule 2.330(h) requires be determined on its legal sufficiency without a hearing, and Petitioner asks that it be determined before any ruling on the merits.

54. Petitioner reserves his rights to due process and compulsory process. The Court closed each of Petitioner's examinations by time (Tr. 61:19-20; 107:9-10; 133:19-20), Petitioner's request to testify was not reached (Tr. 88:8-12), and the person who ran the searches did not appear in response to a subpoena. Unless the Court issues a peremptory writ on the existing record, Petitioner reserves the right to complete the examination of the witnesses, to present his own testimony, and to enforce the subpoena to Daniel Quiros, as requested in Filing 256949636.

55. Participation in closing argument is not acquiescence in the in camera submission as delivered. Respondents sent the files to chambers without copying Petitioner and without a custodian's certification or an index (paragraph 44). Petitioner's proposed Order Establishing Protocol for In Camera Inspection (Filing 256318669) and Notice of Objection (Filing 256489625) are incorporated and remain pending, and Petitioner objects to any finding of compliance that rests on the submission as delivered.

56. Petitioner reserves his claim to the expenses of the August 3, 2026 deposition of the records custodian, noticed and not attended by the witness or Respondents' counsel before any protective order existed (Filing 256954496, Ex. G), including the court reporter's charges, under Florida Rule of Civil Procedure 1.380(d).

57. Petitioner maintains that compliance with Chapter 119 for this request includes production of the located records in the form in which the University keeps them, with their system metadata intact, as he asked in writing on September 3, 2026 (Filing 256513029, Ex. 1). The September 2 submission and Exhibit D are flattened renderings. Nothing in this brief withdraws that request or Petitioner's separate pending public records request for the search outputs.

58. Petitioner reserves entitlement to attorney's fees and costs under section 119.12(1), Florida Statutes, the custodian having received the written notice that subsection (1)(b) requires on May 4, 2026 (App. 67-68), more than five business days before this action was filed, and asks in Part V that the costs of enforcement be assessed now and the fee question reserved.

V. Relief requested

WHEREFORE, Petitioner respectfully asks that the Court:

- a. Before ruling on compliance, enter a written order requiring Respondents, within five days of this order, to:
 - (1) deliver to the Court for in camera inspection every page of every delivery recorded in the University's own processing file for Request No. W018463-032626: the 330 pages and the 10 pages delivered March 30, 2026 (Resp. Ex. I, packet p. 90); the 621 pages received from UFIT April 24, 2026 (Ex. K at 273); the 109 pages and 17 messages delivered May 4, 2026 (Resp. Ex. N; Ex. K at 129, 273); and the 88 pages delivered May 7, 2026 (Ex. K at 273), with no page excluded on the ground that the University considers it not a public record, not responsive to this request, or gathered for another request;
 - (2) file and serve on Petitioner a certification of the records custodian under section 92.525, Florida Statutes, that every page of each of those deliveries is before the Court, identifying by file name and page range where each delivery sits in the submission as supplemented;
 - (3) file and serve on Petitioner an index of every page before the Court, stating for each document its date, author, recipients, general subject matter, the specific delivery and batch from which it came, and, for the 53 pages produced May 4, 2026 and for each page the two witnesses forwarded, where it sits in the submission; and

- (4) under sections 119.07(1)(e) and (1)(f), Florida Statutes, identify, record by record, every located record withheld from Petitioner on an exemption or confidentiality ground, with the statutory citation and the reasons with particularity, and identify, record by record, every other located page not produced to Petitioner, with the ground stated (not a public record, or not responsive) and the basis for that determination;
- and allow each party a supplemental submission of no more than five pages, due seven days after service of the statement, addressing the inspected record;
- b. In the alternative, if the Court rules on the present record: find that Respondents did not carry their burden; order production of every located record not shown to be exempt; find an unlawful refusal under section 119.12(1), Florida Statutes, Petitioner having given the custodian the written notice subsection (1)(b) requires on May 4, 2026 (Pet. ¶ 18; App. 67-68), more than five business days before suit; award costs under section 119.12(1) and any other relief the statute allows; and reserve the question of entitlement to attorney's fees; and
- c. Grant such other relief as the Court deems just.

Respectfully submitted,

/s/ Christopher A. Hanson
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Self-represented Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 14, 2026, the foregoing, with Exhibit A, was filed with the Florida Courts E-Filing Portal, which will serve a Notice of Electronic Filing on James W. Kirkconnell, Esq., jameswk@ufl.edu, counsel for Respondents, and on Kimberly LoGiurato, klogiurato@ufl.edu, a designated e-service address for Respondents.

/s/ Christopher A. Hanson

Christopher A. Hanson
Florida Bar No. 44094
Self-represented Petitioner

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

CASE NO.: 01-2026-CA-001794

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

Petitioners,

v.

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

Respondents.

EXHIBIT A

**CHRONOLOGY OF THE UNIVERSITY'S STATEMENTS CONCERNING THE
RECORDS LOCATED FOR REQUEST NO. W018463-032626**

Each entry is quoted from a document of record and cited to it. Citations follow the key on page 1 of the brief.

Date	Source	Statement	Record cite
March 26, 2026	Petitioner's request	Asked that any exemption be stated "in writing, citing the specific statutory exemption," with a log of "date, author, recipient, and general subject matter."	Pet. Ex. A, App. 4-5
March 30, 2026	UFIT to Records Office (Wood to Hines)	330 pages, excluding attachments, plus 10 pages delivered into the request four days after it was made.	Resp. Ex. I, packet p. 90
March 30, 2026, noon	Dr. Cuillier	Forwarded "the e-mail chain that we had, which are the only responsive records," "less than a half hour" after being asked.	Tr. 23:10-12; 32:7-10
April 3, 2026	Hines to Quillen; Quillen to Hines	"Did you want me to provide the chart below to the requestor or did you want to invoice for the 340 pages?" Answer: "I think very little of this may be responsive, so no invoice for now."	Resp. Ex. J, packet p. 94
April 23, 2026	UF portal to Petitioner; Quillen to Hines	"Your request is undergoing the legal review." Same day, to Hines: "You can let him know that his request is undergoing the legal review."	App. 11; Ex. K at 68
April 24, 2026	UF processing file (logged	621 pages "received from	Ex. K at 273; Tr. 105:25-

	entry)	UFIT" logged inside this request's file. The custodian later testified they belong to a different request.	106:2
May 4, 2026, 10:40 a.m.	UFIT to Records Office	"our search tool stalled before completing the search of Professor Bambauer's mailbox"; 17 messages "should have been included previously."	Resp. Ex. N, packet p. 109; Ex. K at 129; Tr. 115:24-116:10
May 4, 2026, 3:22 p.m.	UF portal to Petitioner	53 pages produced: the 50-page Hanson-Cuillier chain and Petitioner's 3-page March 25 email to Professor Bambauer. "This completes the public records request."	Pet. Ex. B, App. 12-65
May 5, 2026	University letter to Petitioner	"No exempt information was withheld or redacted from the records responsive to your request."	Pet. Ex. D, App. 76; Resp. Ex. R
May 7, 2026, 9:16 a.m.	Quillen (OGC) to UFIT and Hines	"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."	Ex. K at 238
May 7, 2026	Wood (OGC) to Hines	88 additional pages received and copied to a drive "to be reviewed by the General Counsel and for approval to be released."	Ex. K at 273
July 7, 2026	Hines affidavit	IT "gathered over 470 pages"; pages not produced "did not meet the definition of public records" or "concerned individuals having the surname Hanson."	Aff. ¶¶ 6-7 (Filing 251907242, Ex. A)
July 30, 2026	Respondents' Motion for Protective Order, Exhibit D	479 pages filed; category (2) records "have been redacted pursuant to" 20 U.S.C. s. 1232g, s. 1006.52, and s. 119.071(5)(b).	Filing 253616687 ¶ 24 & n.4
September 2, 2026	Hines, sworn testimony	"Q Did the University of Florida assert any exemptions? A No." The 340 pages: "I don't know." He does not decide what is produced.	Tr. 121:17-19; 99:3-5; 130:3-6, 16-18
September 2, 2026	The Court	"any of those documents that have been withheld shall be produced to the Court for an in-camera inspection within five days of today." "All redundancy, every page accounted for."	Tr. 134:14-21; 135:10-12
September 2, 2026, after the hearing	Respondents' counsel to the judicial assistant	Files described by counsel as "the files forwarded to the public records office as part of fulfilling this request," with page counts he listed as	Filing 256513029 ¶ 5 and Ex. 1

		10, 330, 106, 3, 88, and 1; the records "contain some exempt information."	
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