Exhibit B to City's PTJ

**From:** Kyle Moring [redacted]
**Sent:** Wednesday, August 26, 2026 6:12 AM
**To:** Austin Beck
**Cc:** Marla Dial; Lea Ream
**Subject:** Re: Cause No. 44437 – Focused C/E/F/G/I Conferral and Proposed Search Protocols Before August 28

**Follow Up Flag:** Flag for follow up
**Flag Status:** Flagged

Mr. Beck,

Thank you. I received your August 25 letter and its fourteen-page PDF attachment at 5:03 p.m. The additional information narrows certain factual issues but does not resolve the five focused requests.

I respectfully disagree with the letter's characterization that my August 11 submission did not align with the Court's direction. My August 11 email expressly stated my good-faith understanding of the Court's oral direction and invited Respondent to state any different understanding. The submission included the complete written requests, which identify the applicable date ranges, participants or custodians, subject and keyword terms, attachments, and record sources. The separate search protocols were offered only as nonexclusive implementation aids, not as new requests or substitutes for the requested information. A requestor cannot necessarily identify filenames or individual records maintained within the governmental body's systems before those records are searched and produced. Respondent's letter itself identifies searches, result counts, and productions for each request, confirming that the requested categories were understood.

Regardless, to eliminate any possible ambiguity and further facilitate the Court-directed conferral, the following is my concise enumeration of the categories of existing, original-scope, nonduplicate information that remain at issue:

1. **Exhibit C.** Your letter states that C-2 and C-3 were reattached. I did not find either item in the fourteen-page attachment; the six appended source pages concern E and F. Please retransmit C-2 and C-3 or identify the precise prior production date, filename, and location. The remaining issue is limited to any maintained, nonexcepted call-history or voicemail-log fields within the original dates that have not already been supplied. I am not requesting newly created screenshots or carrier records.
2. **Exhibit E.** The letter reports 6,316 possible matches in 290 of 910 locations, while the supplied January 13 statistics image visibly reports 6,316 matches in 209 of 910 locations. The August 13 panel reflects materially different query and date logic. Please advise whether all existing, nonduplicate messages and attachments within E's original terms have been produced and whether the 209/290 difference can be reconciled.
3. **Exhibit F.** The visible query appears to join the participant-domain condition to the Walmart-term condition with AND, although the request contains two independent branches. The supplied statistics image also appears to concern the August 13 Moring-related search. Please advise whether both original F branches were separately searched and reconciled and whether all existing, nonduplicate responsive records have been produced.
4. **Exhibit G.** The letter states that 344 separate emails are potentially responsive and that privilege review remains underway. That status has not been reconciled with your May 13 statement to Kent Richardson that more than 3,000 responsive pages had been identified, approximately one percent was privileged, identification and separation were complete, an Attorney General ruling request would be submitted that evening, and the remaining records would be released. Please provide the anticipated completion date, whether any additional nonprivileged records will be produced before August 28, and any applicable Attorney General tracking number or previous determination relied upon for withholding. I do not seek privileged substance.
5. **Exhibit I.** The letter states that the OneDrive link remains available without restrictions or expiration, but neither your email nor the letter supplied that link. When tested, the separate links contained in the City's March 27, April 21, and May 21 transmittals displayed "This link has been removed." The letter also does not address the May 21 "more emails" production. Please provide a current working link or direct production and confirm whether all existing, nonduplicate direct or embedded City-agency communications and attachments within the original request have been supplied.

This is a continuation of the court-directed conferral, not a new TPIA request. I am not seeking duplicate records, privileged content, an exact KeyQL query, or creation of a new report, log, declaration, or screenshot. Nothing in this response narrows, amends, expands, or withdraws any original request or pleaded claim, constitutes a Rule 11 agreement, or waives any position.

I remain available to confer today or tomorrow. If practicable, please respond by noon on August 27, or identify the earliest time at which Respondent can provide a final production or position before the August 28 setting. I do not represent that noon on August 27 is a court-imposed deadline. If no further production or clarification is forthcoming, I will accurately advise the Court of the remaining conferral status.

With gratitude,

Kyle Douglas Moring
[redacted]

On Aug 25, 2026, at 5:03 PM, Austin Beck <abeck@dtrglaw.com> wrote:

Good evening Mr. Moring,

Attached please find correspondence regarding the conferral ordered the Court at the previous hearing.

Regards,

Austin Beck
<image001.jpg>
601 NW Loop 410 Suite 100
San Antonio, Texas 78216
210-349-6484 Main Office
210-442-2343 Direct
210-349-0041 Fax
www.dtrglaw.com

**ATTENTION OFFICIALS**: A "Reply to All" on this e-mail or reply or forward to one other official could lead to violations of the Texas Open Meetings Act. Please reply only to the sender.

**CONFIDENTIAL NOTICE**: The information in this e-mail may be confidential and/or privileged. This e-mail is intended to be reviewed by only the individual or individuals named above. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this e-mail or the information contained herein is prohibited. If you received this e-mail in error, please immediately notify the sender by return e-mail and delete this e-mail from your system.

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**From:** Lea Ream <LReam@dtrglaw.com>
**Sent:** Saturday, August 22, 2026 1:51 PM
**To:** Kyle Moring [redacted]
**Cc:** Austin Beck <abeck@dtrglaw.com>; Marla Dial <mdial@dtrglaw.com>

**Subject:** RE: Cause No. 44437 – Focused C/E/F/G/I Conferral and Proposed Search Protocols Before August 28

Thank you Mr. Moring.

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**From:** Kyle Moring [redacted]
**Sent:** Friday, August 21, 2026 6:40 PM
**To:** Lea Ream <LReam@dtrglaw.com>
**Cc:** Austin Beck <abeck@dtrglaw.com>; Marla Dial <mdial@dtrglaw.com>
**Subject:** Re: Cause No. 44437 – Focused C/E/F/G/I Conferral and Proposed Search Protocols Before August 28

Good evening, Ms. Ream,

Thank you for letting me know. [personal family-health details omitted] [redacted]

I appreciate the update and will look for your response on Tuesday.

With gratitude,

Kyle Douglas Moring

> On Aug 21, 2026, at 6:27 PM, Lea Ream <LReam@dtrglaw.com> wrote:
>
> Good afternoon Mr. Moring,
> [personal family-health details omitted] [redacted] Mr. Beck has been out on vacation this week through Monday. We will be in touch with you on Tuesday.
> Thank you for your patience and understanding.
> Regards,
> Lea A. Ream
> DTRG

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**From:** Kyle Moring [redacted]
**Sent:** Friday, August 21, 2026 6:06 PM
**To:** Lea Ream <LReam@dtrglaw.com>
**Cc:** Austin Beck <abeck@dtrglaw.com>; Marla Dial <mdial@dtrglaw.com>
**Subject:** Re: Cause No. 44437 – Focused C/E/F/G/I Conferral and Proposed Search Protocols Before August 28

Good evening,

On August 12, you acknowledged receipt of my focused conferral submission and three attachments and stated, “We will be in touch next week.”

My August 11 email requested an August 21 response if feasible and expressly stated that I was not representing August 21 as a court-imposed deadline. As of 6:02 p.m. today, I have not received a proposed conferral time, corrections to the protocols, or any search or production status. I am not characterizing today as a missed court deadline; I am documenting the present conferral status given the August 28 continued setting.

No response is requested after hours tonight. Please respond by noon Monday, August 24, if possible, or provide the earliest practical response time, addressing:

1. A proposed conferral time on Monday or Tuesday;
2. Whether Respondent intends to run the proposed C/E/F/G/I protocols or validated equivalents;
3. Any material correction concerning syntax, scope, cutoff, custodian, or repository;
4. Whether any responsive searches have been completed or remain pending and the anticipated completion date; and
5. Whether Respondent anticipates producing any additional original-scope, nonduplicate records before August 28.

I remain available and will accommodate a reasonable proposed time. This remains a conferral effort only and does not expand any underlying request, seek privileged content, or create a Rule 11 agreement.

If no substantive response is received, I will preserve this correspondence and accurately advise the Court of the conferral status as of the August 28 setting.

With gratitude,

Kyle Douglas Moring
[redacted] | [redacted]

> On Aug 12, 2026, at 2:51 PM, Lea Ream <lream@dtrglaw.com> wrote:
>
> Mr. Morning,
>
> This email acknowledges receipt of your email and the three attachments.
>
> We will be in touch next week.
>
> Regards,
> Lea A. Ream
> DTRG

**From:** Kyle Moring [redacted]
**Sent:** Tuesday, August 11, 2026 12:57 PM
**To:** Austin Beck <abeck@dtrglaw.com>
**Cc:** Lea Ream <LReam@dtrglaw.com>; Marla Dial <mdial@dtrglaw.com>
**Subject:** Cause No. 44437 – Focused C/E/F/G/I Conferral and Proposed Search Protocols Before August 28

Good afternoon,

Consistent with my understanding of the Court's August 10 oral direction that the parties confer regarding a focused presentation before August 28 and attempt to resolve the disputed production issues, I am sending the attached focused conferral materials for proposed Exhibits C, E, F, G, and I. If Respondent understands the oral direction differently, please state its position.

I separately e-filed and e-served Petitioner's Supplement to Pretrial Witness and Exhibit Lists today, identifying Seth Bryan and/or Bryan IT's appropriate technical custodian concerning search execution and electronic-export capabilities.

The attachments provide: **(1)** a concise conferral submission; **(2)** the complete substantive written request pages for C, E, F, G, and I; and **(3)** request-specific source-search and Microsoft Purview/KeyQL protocols. This transmission is limited to request scope and search mechanics. The protocols are implementation aids only, not new requests and not a representation that the Court ordered the exact syntax, custodians, repositories, cutoffs, outputs, or reporting fields. The City or Bryan IT may use corrected or validated equivalent syntax and should identify any material change.

I believe validated, reproducible KeyQL searches for E, F, G, and I, together with the source-specific search for C and appropriate review of original-request sources outside Microsoft 365, provide the most efficient and effective way to resolve or materially narrow the remaining record-completeness concerns. Any known examples referenced in the protocols are nonexclusive search controls and do not limit responsive records. For Exhibit F, the outside-Microsoft-365 source review expressly includes HS GovTech/HSCloud and migrated MyGov/legacy Store 131 complaint, permit, inspection, code-enforcement, case/activity, portal-intake, fee/payment, history, comment, and attachment records within the original request period and terms, using existing platform search, report, record-summary, or batch-export functions as available. The protocol does not ask the City to create a custom report or new log.

Please confirm receipt promptly. By Friday, August 21, if feasible, please advise whether Respondent can run the attached protocols or validated equivalents before August 28; identify any material syntax, scope, cutoff, custodian, or repository correction; and propose a conferral time. If August 21 is not workable, please provide the earliest practical timetable. I do not represent that the Court imposed that specific response date.

I do not seek privileged content, a waiver, credentials, raw tenant access, or the excluded unredacted MPPD report. This email and the attachments are for conferral and do not themselves form a Rule 11 agreement. Any concrete agreement intended to bind the parties can be memorialized separately.

**Attachments:**

- **01_Moring_Focused_Conferral_Submission_C_E_F_G_I_2026-08-11.pdf** (4 pages)
- **02_Moring_Complete_Written_Requests_C_E_F_G_I_10_pages.pdf** (10 pages)
- **03_Moring_Proposed_Search_Protocols_C_E_F_G_I_13_pages.pdf** (13 pages)

With gratitude,

Kyle Douglas Moring

[redacted]

<8.25.26 Ltr_to_Moring RE TPIA Litigation (Mt. Pleasant).pdf>