Filed: 9/9/2026 1:16 PM
Carin Carroll
District Clerk
Titus County, Texas

Debbie Swindler

CAUSE NO. 44437

KYLE DOUGLAS MORING, *Petitioner,*	§	IN THE DISTRICT COURT
v.	§	TITUS COUNTY, TEXAS
CITY OF MOUNT PLEASANT, TEXAS, *Respondent.*	§	76th JUDICIAL DISTRICT

NOTICE OF REVISED HEARING EXHIBIT LIST AND SUPPLEMENTAL EXHIBITS FOR SEPTEMBER 18 2026

TO THE HONORABLE JUDGE OF SAID COURT:

Petitioner Kyle Douglas Moring, appearing pro se, submits Attachment 1's revised exhibit list and Attachment 2's additions and corrections for the continued September 18, 2026 mandamus hearing before visiting Judge Lauren Parish. These materials also relate to the pending plea to the jurisdiction to the extent the Court considers it.

I. PURPOSE AND SCOPE

At the August 28 hearing, the Court directed Petitioner to condense, separate and label the exhibits and expressly offer them. The revised copies provide Plaintiff Exhibit sticker spaces. Petitioner understood the Court to call for conferral about exhibit agreements and objections. He seeks an early conference to narrow those issues; the proposed timing is his request. No completed conference or agreement is represented. Petitioner intends to offer evidence on all thirteen counts, subject to the Court's rulings.

II. ONE SET WITH CONSISTENT IDENTIFIERS

The complete A-AD set contains 30 exhibits and 220 exhibit pages. Its master binder has 224 pages, including four navigation pages. The 131-page condensed selection repeats 128 exhibit pages and three navigation pages. Petitioner submits the 218-page public A-AD set with this Notice, omitting only P-006 and P-007 as explained in Attachment 2. The complete 220-page set was emailed to Respondent's counsel on September 8, 2026.

Petitioner will identify the revised version, exhibit page and printed master page, for example: "Plaintiff's revised Exhibit Z, page 5, master page 194." Earlier labels inside reproduced sources remain historical. Attachment 1 maps the former Plaintiff's Exhibits 1–11 and PR-A–PR-K to A-AD. Stickers use the exhibit letter; all revised copies retain consistent outer labels and master-page footers.

III. ADDITIONS AND CORRECTED DESCRIPTIONS

Exhibit AD, pages AD-001 through AD-006, is newly designated in its entirety for service and hearing use; Petitioner has not previously filed it. The Finder captures at AB-007 and AB-008 were made September 7, 2026. Attachment 2 also identifies new or revised reading copies, comparisons, and source pages whose precise earlier filing location is unconfirmed. A record's date and its first submission to this case are different facts.

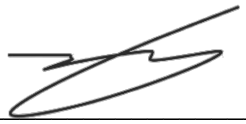
The revision is more than a change in formatting. Attachment 2 identifies corrected descriptions that Petitioner will use at the hearing, including the October 28, 2025 "video" email produced May 21, 2026, the historic 88-row comparison, and the distinction between call dates and file dates. Those corrections govern Petitioner's descriptions of the identified items for this hearing. The original filed documents and source records remain unchanged. This notice adds no count or new public-information request and does not substitute for an amended petition.

IV. FOUNDATION AND TIMING

New comparisons and reading copies are identified as prepared material. Petitioner will establish the appropriate source, personal-knowledge and comparison foundation, including the computer and ChatGPT assistance used, and make the underlying retained records available as required. Petitioner does not represent that he observed the City's internal searches or that a difference between files proves deletion or withholding.

Petitioner will identify the pages offered, establish their foundation, and request an admission ruling. Filing or service alone does not admit an exhibit. Applicable disclosure deadlines and any permission to supplement under Rules 193.5, 193.6 or 194.4 remain for the Court. The discovery and preservation motion is separate.

Respectfully submitted,



Kyle Douglas Moring
Petitioner, Pro Se
[redacted]

CERTIFICATE OF SERVICE

I certify that on September 8, 2026, I served true and correct copies of the complete revised Exhibits A through AD, including reserved pages P-006 and P-007, upon Austin R. Beck and Lea A. Ream, counsel for Respondent, by email. I further certify that on September 9, 2026, I served true and correct copies of this Notice with Attachments 1 and 2 and the accompanying 218-page public filing set of revised Exhibits A through AD, excluding reserved pages P-006 and P-007, upon the same counsel and all other required service contacts of record by electronic service through eFileTexas in accordance with Texas Rule of Civil Procedure 21a.



Kyle Douglas Moring
Petitioner, Pro Se
[redacted]

ATTACHMENT 1 REVISED HEARING EXHIBIT LIST

Petitioner expects to offer these exhibits in whole or by relevant pages, subject to the Court's direction and rulings. P-006 and P-007 are reserved from new public filing pending a specific privilege/use ruling as explained in Attachment 2. No exhibit or count is withdrawn by the condensed selection.

Ex.	Description	Hearing pages	Count or role
A	MPPD request and City / IT routing	A-001 to A-005	I
B	October 28 inspection records	B-001 to B-007	II
C	Chief personal-phone call / voicemail request	C-001 to C-003	III
D	January 13 inspection records	D-001 to D-008	IV
E	Moring keyword request and specific email controls	E-001 to E-013	V
F	Walmart request and concrete source records	F-001 to F-016	VI
G	Attorney correspondence and legal-expense request	G-001 to G-005	VII
H	January 9 fire inspection and City response	H-001 to H-010	VIII
I	Regulatory correspondence and agency source records	I-001 to I-024	IX
J	City Manager email-routing direction	J-001 to J-002	Support
K	OAG determination and City answers	K-001 to K-008	Support
L	Ankrum call records	L-001 to L-007	X
M	City-managed calls and Chief-line inquiry	M-001 to M-008	XI
N	Separate fire-plan ruling	N-001 to N-003	Context
O	July complaint submissions and handling	O-001 to O-005	XII

ATTACHMENT 1 REVISED HEARING EXHIBIT LIST CONTINUED

Ex.	Description	Hearing pages	Count or role
P	Ordinance-development records	P-001 to P-007	XIII
Q	Preservation notices	Q-001 to Q-007	Preservation
R	Seven City certifications and production sequence	R-001 to R-014	Support
S	Historical OAG portal observations	S-001 to S-002	Context
T	DSHS referrals later supplied by City	T-001 to T-003	IX / overlaps
U	Administrative review status	U-001 to U-003	Context
V	Agency email family and corrected version comparison	V-001 to V-004	V / VI / IX
W	City information sent to OAG / DA	W-001 to W-003	Context
X	Inspection software and actual City use	X-001 to X-004	II / IV / VI / XII
Y	August 25 City letter and search screens	Y-001 to Y-014	III / V-IX
Z	City HS GovTech contract	Z-001 to Z-010	II / IV / VI / XII
AA	August 27 City response and supplied texts	AA-001 to AA-008	III / V-IX
AB	Call images, May correspondence and Finder views	AB-001 to AB-008	III
AC	May link and saved access-error observations	AC-001 to AC-003	IX
AD	USB inventory, comparison and receipt-related sources	AD-001 to AD-006	VII / IX

Where the earlier PR exhibits appear in the revised hearing binder

The August 30 response used exhibit numbers 1–11, also identified as PR-A–PR-K. The table below shows where **selected material from those exhibits** appears in the revised A–AD hearing binder.

Label in August 30 response	Exhibit in revised hearing binder
1 / PR-A	B and I
2 / PR-B	C and AB
3 / PR-C	E
4 / PR-D	H
5 / PR-E	I
6 / PR-F	O
7 / PR-G	I
8 / PR-H	I
9 / PR-I	I
10 / PR-J	E and G
11 / PR-K	F

For this hearing, Plaintiff's Exhibit stickers will use letters A–AD. The earlier numbers and PR labels remain references to the August 30 filing. They will not receive separate stickers.

This table identifies selected material carried into the revised binder; it does not mean that every page of each earlier PR exhibit is reproduced. Navigation page 4 of the complete binder and the Page Source Register provide the detailed cross-references.

The previously filed volumes remain available for context. This list identifies the revised hearing selection and does not imply that the Court has admitted any listed item.

ATTACHMENT 2 ADDITIONS AND CORRECTED DESCRIPTIONS

This schedule identifies newly designated material and new presentations of older sources. An unconfirmed earlier filing counterpart is disclosed as a supplement; that does not establish that the underlying record was never filed. Prior PDF references mean physical pages. The 218-page public exhibit set accompanies this Notice. Additional filing or delivery will follow the Court's directions.

AD-001 through AD-006 – Entirely new Exhibit AD

All six pages are newly designated as Exhibit AD for service and hearing use. AD-001 and AD-002 are corrected USB inventory and earlier-download comparisons. AD-003 through AD-005 reproduce retained April 2, April 9 and May 10 folder views. AD-006 is a reading copy of Webster's March 6, 2026 question to Beck. Older source dates do not make AD a previously filed exhibit.

AB-007 and AB-008 – September 7 Finder captures

New screenshots of Finder information for IMG_0486.PNG and IMG_0487.PNG. They distinguish the May 11 content-created display from the June 2 Created and Modified displays. AB-001 and AB-002 reproduce the already-identified call pictures.

A-005 – Webster assignment to Seth Bryan

Newly prepared reading copy of the November 14, 2025 MSG supplied in the March 10 production. It connects the Exhibit A request with the IT assignment. The exact prior filing of this reading page is not asserted.

B-004 – Internal inspection explanation

Newly prepared reading copy of Ankrum's November 13, 2025 reply and Webster's quoted question. It is additional to the requestor-facing correspondence at B-001 through B-003; prior filing of this particular rendering is not asserted.

E-012 and E-013 – IT assignment and two-message comparison

E-012 is a newly prepared excerpt of Webster's September 15, 2025 message to Seth Bryan, supplied by the City in March. E-013 is a new September 8, 2026 software- and ChatGPT-assisted comparison of the September and November messages against the original February ZIPs. Both messages are credited as received in March. Exact-ID absence from those ZIPs is not absence from unexamined search results or proof of a current withholding. These two pages are additional to the earlier E selection; prior filing of the September source elsewhere is not asserted.

F-001 through F-005 and F-009 – Request and email reading copies

F-001 through F-003 reset the December 30 request; F-004 excerpts the February 2 response. Those request/response subjects already appear in filed F materials. F-005 renders Vine's October 23, 2025 internal MSG. F-009 renders selected September 18-19, 2025 format correspondence. The latter two are identified here as additional prepared reading copies.

I-009 – City meeting acceptances

Corrected identification rendering of the two October 16, 2025 City acceptance messages, replacing the proposed hearing use of the rendering at August 30 response PDF page 34. The City's April 21 production of those messages is credited. The messages alone do not connect the meeting to a later inspection.

V-004 – October 28, 2025 "video" email produced May 21, 2026

Corrects the earlier description of a missing message body, including Third Supplement PDF page 25 and the August 26 Limited Brief packet PDF page 101. The October 28, 2025 email from Amber James to Randall Hodo, subject "video," was produced on May 21, 2026. It contains readable message text that the earlier extraction missed. No ordinary attachment was listed in that file. The later protected copy uses different packaging. These differences do not establish that text or an attachment was removed. The separate October 27, 2025 EPA–TCEQ–MPPD forwarded thread and its video attachment were verified in the August 14 and August 25 productions.

B-005 through B-007; D-005 through D-008 – Inspection source pages

October 28 inspection/history source and selected January 13 report pages, including the contact/comments page. These fuller source selections are specifically identified with this revision. Their exact earlier page-for-page filing location has not been confirmed. D-003 and D-004, the January 21 follow-up, have counterparts in filed Volume 1, PDF pages 112-113.

F-006 through F-008; F-010 and F-011 – Axon, statement and inspection examples

F-006 reproduces an upload-link notice page with a counterpart in filed Volume 3, PDF page 235. F-007 is the redacted statement returned by Bailey; F-008 is his August 26, 2026 transmittal. F-010 and F-011 supply scanned/electronic inspection examples. Prior filing of those four exact source selections has not been confirmed.

H-008 through H-010 – January 9 fire-report context

Selected pages 1, 9 and 10 from the report in the original March 3 ZIP. H-010 is the report-page counterpart of PR-D, August 30 response PDF page 46. The additional identity and time context is expressly included; the E-Mail entry does not alone establish that a separate email was created or retained.

L-003 and L-005; M-001 through M-004 and M-007 through M-008 – Telephone source copies

Retained call images and the full clarified December 4 request, line inquiry and later delivery message. These source copies replace older selected summaries where applicable. Exact earlier counterparts for all of these copies have not been confirmed. The December 4 source controls the requested period and filters; the later delivery is credited.

O-004 and O-005; P-004 – City response, inspection letter and agenda report

August 4, 2025 City complaint response; received July 28 inspection letter; and the Agenda Item Report obtained from the public meeting website. They are identified as specific source copies, not newly created records. The July 28 letter and agenda report are credited as obtained; exact prior filing of each selected copy has not been confirmed.

P-006 and P-007 – Reserved from new public filing

These internal-correspondence pages remain in the complete 220-page set designated for service on counsel. Petitioner reserves them from new public filing pending a specific privilege/use ruling, without conceding privilege or abandoning Count XIII. The separate public-upload set contains 218 exhibit pages and retains P-001 through P-005, with no renumbering. This reservation does not seal or alter prior filings. Any private judicial inspection will follow the Court's directed procedure.

R-001 through R-006; AB-006 – Request and production sequence

May 27, 2026 request, June 2 City transmittal and June 3 omission follow-up. AB-006 repeats the pertinent June 2 transmittal for the call-image sequence. These additional source pages are distinguished from the previously filed July 2 OAG receipt and five certifications. Exact earlier filing of these source selections has not been confirmed.

R-013 and R-014 – Two additional certifications

OR-25-058955-IC and OR-25-034390-IC are added to the five certifications in the August 3 Exhibit R filing. The first concerns aggregate TPIA request data; the second concerns the earlier code-compliance request. They are not assigned to Count II. Prior filing of these two forms elsewhere has not been confirmed.

AC-002 and AC-003 – Individual saved error pages

May 28 and August 26 saved link-result pages are reproduced directly. The earlier Sixth Supplement described the access issue; exact earlier filing of these individual captures has not been confirmed. Only access URL text is omitted from the displayed browser header; complete originals remain retained.

Historic comparison totals and other reorganized material

The historic 88-row comparison is not a verified current count of withheld emails. Later productions and quoted-text matches must be credited; an unmatched file does not prove withholding. Earlier filing references identify reproduced records, including PR sources. Labels, sticker spaces, black-and-white headings, cropping of blank margins and removal of duplicates do not create source evidence. Prepared comparisons require foundation and are not City records or expert opinions.

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 119684581
Filing Code Description: Notice
Filing Description: Notice of Revised Hearing Exhibit List and Supplemental Exhibits for September 18, 2026
Status as of 9/9/2026 3:39 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Austin R. Beck		abeck@dtrglaw.com	9/9/2026 1:16:47 PM	SENT
Lea A. Ream	16636750	lream@dtrglaw.com	9/9/2026 1:16:47 PM	SENT
Marla Dial		mdial@dtrglaw.com	9/9/2026 1:16:47 PM	SENT