Filed: 9/16/2026 8:26 AM
Carin Carroll
District Clerk
Titus County, Texas

Jeffrey McClendon

CAUSE NO. 44437

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

PETITIONER'S SUPPLEMENTAL NOTICE OF SUBSEQUENT PRODUCTION AND PROPOSED ADDITIONAL HEARING EXHIBITS

TO THE HONORABLE JUDGE OF SAID COURT:

Petitioner Kyle Douglas Moring gives notice of the City's September 15, 2026 production and requests permission, to the extent necessary, to offer the three limited items identified below at the September 18 hearing. This notice updates the production history discussed in paragraph 107 of the First Amended Petition and page 5 of Petitioner's September 11 response to Respondent's September 10 letter. It also identifies a comparison relevant to Count VI's Walmart-related request.

I. SUBSEQUENT PRODUCTION AND PRIOR RECEIPT

1. On September 15, 2026, at 4:32 p.m., Austin Beck emailed Petitioner a four-page PDF, describing it as all responsive information deemed releasable under OAG ruling OR2026-018153. Petitioner credits receipt. The retained email chain also contains Mr. Beck's September 14 statement that the City had located the responsive files and related ruling and expected to release the releasable documents the following day. That statement does not specify when the files were first located.

2. The four pages contain a three-page March 9, 2024 Traditions Fire Consulting plan-review letter and a UL service-company certificate. Their page text matches material in the earlier permit archive and in attachments to a native email received on the August 28 USB. Petitioner does not characterize the underlying plan content as first received on September 15. The UL page identifies a service company; it is not a site-specific final acceptance or installation certificate.

3. The related native email is Aristeo Rodriguez's October 23, 2025 message to Candias Webster and Jennifer Williams, subject "Request #1/ FW: Walmart Fire Alarm Update STORE 0131." It was received in the August 28 City Attorney production and is credited as received. Its date falls within Count VI's January 1, 2024–December 29, 2025 period. The request appears at filed Exhibit F, pages 1–3, corresponding to proposed **F(a)**; the February 2 delivery and closure appear at filed Exhibit F, page 4, corresponding to proposed **F(b)**. A comparison of the email's exact Message-ID against the 19 standalone MSG files in the original February 2 Walmart production ZIP found no matching identifier. This comparison concerns

that original ZIP; it is not a claim that the email remains missing or was absent from every later production.

4. The comparison helps identify why the original search coverage and export records matter to Count VI and proposed Requests 2 and 3 attached to the September 15 discovery motion. It does not by itself establish that additional records remain withheld. The Rodriguez/OAG matter remains contextual, as stated in paragraph 107 of the First Amended Petition and filed Exhibit N, pages 1–3. This notice adds no independent count and seeks no ruling on the District Attorney complaint.

5. District Attorney Charles C. Bailey is handling Petitioner's August 13, 2026 complaint concerning compliance with OR2026-018153. That complaint involves the same February 9 Rodriguez records request addressed in the OAG's May 22 determination. See filed Exhibit K, pages 3–4. Petitioner copied Mr. Bailey on his May 26 request for revision; on May 29, Mr. Bailey found no violation and expressly adopted the OAG's findings. The subsequent August and September productions provide additional production history concerning that underlying request. Petitioner presents this history so the Court can assess the earlier representations alongside the later-produced records, without treating Mr. Bailey's September correspondence as a new finding of a violation.

II. LIMITED ADDITIONAL EXHIBIT DESIGNATIONS

6. The attached copies are proposed additions to the existing offer list, subject to the Court's labeling direction. Existing designations and the previously disclosed 73 items, including **F(a)** and **F(b)**, remain unchanged. Citations to filed Exhibits K and N identify background already filed; those citations do not add the earlier letters to the individual offer list. The three proposed additions are:

Attachment	Proposed label	Document and limited purpose
1	N(a)	September 15 production email chain, 3 pages. Delivery and the City's September 14 explanation.
2	N(b)	September 15 produced PDF, 4 pages. Exact material delivered under OR2026-018153.
3	F(n)	October 23 native-email printout, 2 pages. Identifying headers, full visible message body and quoted thread, original highlighting, inline image and attachment names. Converted from the MSG for the Count VI comparison; attached plans not appended.

7. Attachment 3 is a two-page printout converted from the retained native MSG. It reproduces the identifying headers, complete visible message body and quoted thread, original highlighting, inline image and five attachment names. Fonts, spacing and pagination were adjusted for printing; the source wording was preserved. The attached plan PDFs are not appended. This is a converted printout,

not a PDF supplied by the City. The native source and attachments are retained. The September 15 delivery is new; the August 28 message was already held. The connection was identified during the September 15–16 review. No consent to admission is represented.

8. On September 15, 2026, at 10:50 p.m., Petitioner emailed Mr. Bailey and Mr. Beck, copying Ms. Ream and Ms. Webster, a supplemental factual submission and a 94-page supporting binder concerning this production history. That transmission gave Respondent's counsel the underlying history; it did not include the two-page printout prepared for this notice. The exact proposed court copies are attached here for service with this notice. The 94-page binder is not added to the court attachment set, and no acknowledgment or agreement concerning that submission is represented.

III. REQUEST TO PRESENT THE LIMITED UPDATE

9. Petitioner requests leave, if required, to present these limited additions at the already-set September 18 hearing. Because the delivery occurred September 15, he requests any necessary shortening of notice under Texas Rule of Civil Procedure 21(b). If Rule 193.6 applies, he requests an opportunity to establish good cause or lack of unfair surprise or prejudice, including the delivery dates, limited selection and prior production of the source records. Filing this notice does not itself set a motion or admit an exhibit. Petitioner will identify each offered item, establish its foundation and request a ruling.

Petitioner asks the Court to consider this production-status update and permit the limited additional offers as appropriate. No change to the pending discovery requests, hearing setting or previously pleaded counts is requested.

Respectfully submitted,

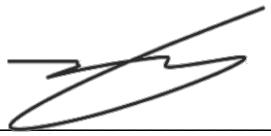


_____

Kyle Douglas Moring
Petitioner, Pro Se
[redacted]

CERTIFICATE OF SERVICE

I certify that on September 16, 2026, I served a true and correct copy of this Supplemental Notice, including Attachments 1–3 (nine supporting pages), through eFileTexas electronic service on Austin R. Beck (abeck@dtrglaw.com) and Lea A. Ream (lream@dtrglaw.com), counsel for Respondent, with Marla Dial (mdial@dtrglaw.com) copied and all other required service contacts of record for Respondent included, in accordance with Texas Rule of Civil Procedure 21a.



Kyle Douglas Moring
Petitioner, Pro Se
[redacted]

From: **Austin Beck** abeck@dtrglaw.com
Subject: RE: Kyle Moring Complaint Dated August 13, 2026
Date: September 15, 2026 at 4:32 PM
To: Kyle Moring [redacted]
Cc: cwebster cwebster@mtpleasanttx.gov, cbailey cbailey@co.titus.tx.us, Lea Ream LReam@dtrglaw.com

AB

Mr. Moring,

Attached please find all responsive information deemed releasable by the OAG ruling OR2026-018153.

Regards,

Austin Beck

DAVIDSON TROILO REAM & GARZA PC

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.

From: cbailey@co.titus.tx.us <cbailey@co.titus.tx.us>
Sent: Monday, September 14, 2026 3:23 PM
To: Austin Beck <abeck@dtrglaw.com>; Lea Ream <LReam@dtrglaw.com>
Cc: Kyle Moring [redacted] ; cwebster <cwebster@mtpleasanttx.gov>
Subject: Re: Kyle Moring Complaint Dated August 13, 2026

Thank you, Mr. Beck.

September 14, 2026 3:00 PM, "Austin Beck" <abeck@dtrglaw.com> wrote:

> Mr. Bailey,
>
> The City has located the responsive files and the related OAG ruling. Per the OAG ruling

The City has located the responsive files and the related OAG ruling. Per the OAG ruling, some of the pages must be released but other must be withheld. My office is in the process of separating what must be withheld so that the remaining documents can be released. I expect the releasable documents will be delivered to Mr. Moring by COB tomorrow.

Regards,

Austin Beck

DAVIDSON TROILO REAM & GARZA PC

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.

From: cbailey@co.titus.tx.us <cbailey@co.titus.tx.us>
Sent: Sunday, September 13, 2026 1:24 PM
To: Austin Beck <abeck@dtrglaw.com>; Lea Ream <LReam@dtrglaw.com>
Cc: Kyle Moring [redacted]
Subject: Re: Kyle Moring Complaint Dated August 13, 2026

Mr. Beck:

I sent the referenced complaint to you on August 13, 2026. We discussed the matter on August 28, 2026, while you were here in Mt. Pleasant on another matter. Please advise immediately why I should not enter a finding that this ruling of the Attorney General has not been complied with by the City of Mt. Pleasant.

Thank you,

Chuck Bailey
District Attorney

August 13, 2026 3:07 PM, cbailey@co.titus.tx.us wrote:

> Mr. Beck:

Please find attached my letter and a copy of the referenced complaint.

Please advise.

Thank you,

Chuck Bailey
District Attorney

Resp Info - Moring-1.pdf
341 KB

P.O. Box 5587
Frisco, Texas 75035
www.traditionsfire.com

TRADITIONS FIRE CONSULTING LLC

March 9th, 2024

Sacramento Engineering Consultants
10555 Old Placerville Road
Sacramento, California 95827
ACR – 1661056
APS – 1661063

Re: Fire Alarm Plan Review
Wal-Mart
2311 S. Jefferson Avenue
Mount Pleasant, Texas 75455

I have reviewed the submitted fire alarm plans and associated documentation for the proposed installation at the above captioned location. The submitted plans were reviewed for general compliance with the 2016 edition of NFPA 72 – *National Fire Alarm and Signaling Code,* and the 2018 edition of the International Fire Code as adopted by the City of Mount Pleasant in Local Ordinance 2021-4. **The submitted plans are approved for general compliance with NFPA 72 (2016) and Local Ordinance 2021-4 upon compliance with the comments listed below.**

1. This plan review letter does not constitute a permit issuance by the Mount Pleasant Fire Department. The release for commencement of field installation is not under the authority of Traditions Fire Consulting LLC. Once your plans are approved you will need to obtain a permit from the Mount Pleasant Fire Department.
2. The comments included in this plan review letter do not replace, nor supersede any codes and/or ordinances adopted by the City of Mount Pleasant, or determinations and interpretations of the Mount Pleasant Fire Marshal.
3. This review was for the replacement of the existing fire alarm system with the installation of a Bosch B9512G fire alarm system for monitoring of the fire sprinkler systems, AHU's over 2,000 cfm, smoke detectors and manual pull stations in an existing Group M occupancy. The scope of work includes the installation of occupant notification devices, remote annunciators, and a new SLC home run from the FACP to the existing SLC loop. All existing equipment to remain was assumed to have been designed, installed, and maintained in accordance with all applicable codes and standards adopted by the City of Mt Pleasant.
4. The plans shall reference the 2018 International Fire Code with amendments as adopted in Local Ordinance 2021-4. The 2016 edition of NFPA 72 is referenced in the 2018 IFC

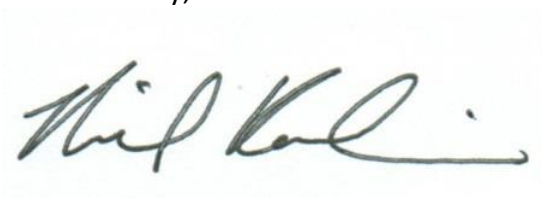
and shall serve as the referenced design standard unless the AHJ accepts a more current edition.

5. The fire alarm equipment shall match the fire sprinkler equipment requiring monitoring. *This will be field verified.*
6. The audible and visible alarm notification devices shall comply with the performance objectives outlined in NFPA 72 and in accordance with Sections 907.5.2.1 and 907.5.2.3 of the 2018 International Fire Code.
7. The visual notification devices shall be synchronized where more than two visual devices are in the same field of view. *NFPA 72-18.5.5.4.2*
8. The fire alarm system shall identify the specific initiating device address, location, device type, and status including indication of normal, trouble, and supervisory status, as appropriate. *2018 IFC Section 907.6.3 as amended*
9. Wiring shall comply with the requirements of NFPA 70 and NFPA 72. All fire alarm system guide wires shall be painted red or labeled "Fire Alarm Only". All fire alarm wiring junction boxes shall be labeled "Fire Alarm Use". All fire alarm circuits shall be identified at terminal and junction boxes. *2018 IFC Section 907.6.1*
10. The dedicated power circuit shall be labeled both in the FACP and the electric panel in red to state “FIRE ALARM”. The location of the circuit disconnecting means shall be permanently identified at the FACP. *NFPA 72-10.6.5.2.2*
11. A system employing a DACT shall employ one telephone line (number). In addition, one of the alternative technologies listed in NFPA 72-26.6.4.1.4 shall be used as a secondary means of alarm transmission. *NFPA 72 allows for the use of a listed single communications path for alarm transmission as detailed in NFPA 72 26.6.3.1.5 <u>unless prohibited by the Fire Marshal</u>.* If a single communications path is used, the communications path shall be supervised at an interval of not more than 60 minutes. A failure of the path shall be annunciated at the central station within 60 minutes. The failure to complete a signal transmission shall be annunciated at the protected premises in accordance with NFPA 72-10.15.
12. Fire protection equipment identification shall be provided in accordance with Section 509 of the IFC. Unless more stringent requirements apply, lettering for signs required by this section shall have a minimum height of 2 inches when located inside the building and 4 inches when located outside, or as approved by the Fire Marshal. The letters shall be of a color that contrasts with the background. *IFC Section 509.1*
13. With every new system, a documentation cabinet shall be installed at the FACP. This will be field verified. *NFPA 72-7.7.2.1*
14. A Fire Alarm Record of Completion shall be delivered to the owner or owner’s representative upon final acceptance of the system per NFPA 72.
15. A Texas Department of Insurance Fire Alarm Installation Certificate shall be provided on site at time of final inspection. A copy shall be provided to the AHJ.

Plans approved by Traditions Fire Consulting LLC does not release the contractor or property owner from the responsibility of full compliance with all applicable codes, statutes, and ordinances relating to the construction project. Final approval is subject to field verification of the installation per the approved plans, contract specifications, and comments forwarded.

Please contact me at (972) 979-0631 with any questions and/or concerns regarding the comments included in this letter.

Professionally,



Nicholas Kalina, CFPS
President
Traditions Fire Consulting LLC

Party Site No.: **643290**
Expires: **31-Dec-2024**

CERTIFICATE OF COMPLIANCE

THIS IS TO CERTIFY that the Alarm / Service Company identified below is included by - UL Solutions (UL) in its UL Product iQ directories as eligible to use the UL Listing Mark in connection with Certificated Systems. The only evidence of compliance with UL's requirements is the issuance of a UL Certificate for the System and the Certificate is active under UL's Certificate Verification Service. This Certificate does not apply in any way to the communication channel between the protected property and any facility that monitors signals from the protected property.

Listed Service From: BENTONVILLE , ARKANSAS

Alarm / Service Company: (643290)

WAL-MART STORES INC (SUPPLIER DIRECT)
702 SW 8TH ST
BENTONVILLE , Arkansas 72716 UNITED STATES

The Alarm / Service Company is Listed in the following Certificate Service Categories:

File	Vol No.	CCN	Listing Category
S3152	7	UUFX	Central-station Protective Signaling Services
S25115	1	UUKA	Monitoring Stations, Proprietary Fire Alarm

*****THIS CERTIFICATE EXPIRES ON 31-DEC-24*****

"LOOK FOR THE UL ALARM / SYSTEM CERTIFICATE"

From: Aristeo Rodriguez <arodriguez@mpcity.org>
To: Candias Webster <cwebster@mpcity.org>; Jennifer Williams <jwilliams@mpcity.org>
Date: October 23, 2025 at 2:10:02 PM CDT
Subject: Request #1/ FW: Walmart Fire Alarm Update STORE 0131
Message-ID: <SA2PR16MB40745AD07B857EB53523EF05BAF0A@SA2PR16MB4074.namprd16.prod.outlook.com>

From: John Ankrum <jankrum@mpcity.org>
Sent: Thursday, March 14, 2024 7:55 AM
To: Himanshu Bhartiya <himanshu@saceng.com>
Cc: Aristeo Rodriguez <arodriguez@mpcity.org>
Subject: RE: Walmart Fire Alarm Update STORE 0131

Himanshu, you stamped plans are attached

From: Himanshu Bhartiya <himanshu@saceng.com>
Sent: Wednesday, March 13, 2024 5:30 PM
To: John Ankrum <jankrum@mpcity.org>
Cc: Aristeo Rodriguez <arodriguez@mpcity.org>
Subject: RE: Walmart Fire Alarm Update STORE 0131

CAUTION: [EXTERNAL EMAIL]

Aristeo

Please see attached and let me know if these are the correct locations for the pull stations

Thanks

Himanshu Bhartiya, ME, EE, FPE, LEED AP

Vice President

Sacramento Engineering Consultants

10555 Old Placerville Road

Sacramento, CA 95827

(916) 368-4468 ext. 105 fax: (916) 368-4490

himanshu@saceng.com

www.saceng.com

REGISTERED IN ALL 50 STATES

From: John Ankrum <jankrum@mpcity.org>
Sent: Wednesday, March 13, 2024 6:30 AM
To: Himanshu Bhartiya <himanshu@saceng.com>
Cc: Aristeo Rodriguez <arodriguez@mpcity.org>
Subject: FW: Walmart Fire Alarm Update

See note from Fire Marshall below. Please update the plans and resubmit. Thanks

From: Aristeo Rodriguez <arodriguez@mpcity.org>
Sent: Friday, February 23, 2024 2:43 PM
To: John Ankrum <jankrum@mpcity.org>; Brad Eubanks <BEubanks@mpcity.org>; Danny Beard <DBeard@mpcity.org>
Cc: Larry McRae <LMcRae@mpcity.org>
Subject: Re: Walmart Fire Alarm Update

3 additional pull stations required. One on the north side in the employee area behind the meat department, one on the east side by the main alarm panel, and one on the south side near the service center by the tire shop. Thanks.

Aristeo Rodriguez

Deputy Chief

Mt. Pleasant Fire Dept

work: 903-575-4144

cell:[redacted]

From: John Ankrum <jankrum@mpcity.org>
Sent: Thursday, February 22, 2024 10:33 AM
To: Aristeo Rodriguez <arodriguez@mpcity.org>; Brad Eubanks <BEubanks@mpcity.org>; Danny Beard <DBeard@mpcity.org>
Cc: Larry McRae <LMcRae@mpcity.org>
Subject: Walmart Fire Alarm Update

Please review the attached fire alarm plans for Walmart. Let me know if you ok with them? Thanks

John Ankrum

Building Official

903-575-4102

jankrum@mpcity.org

Attachments

Fire Alarm.pdf

image001.png

Fire Alarm 2.pdf

Fire Alarm 3.pdf

Scope of Work Add On.pdf

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: 119965313
Filing Code Description: Notice
Filing Description: Petitioner???s Supplemental Notice of Subsequent Production and Proposed Additional Hearing Exhibits, with Attachments 1???3
Status as of 9/16/2026 9:34 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Austin R. Beck		abeck@dtrglaw.com	9/16/2026 8:26:25 AM	SENT
Lea A. Ream	16636750	lream@dtrglaw.com	9/16/2026 8:26:25 AM	SENT
Marla Dial		mdial@dtrglaw.com	9/16/2026 8:26:25 AM	SENT