CAUSE NO. 44437

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

PETITIONER'S INITIAL DISCLOSURES

Texas Rule of Civil Procedure 194.2 – service copy

Petitioner Kyle Douglas Moring provides the following initial disclosures based on information reasonably available to him as of August 4, 2026. These disclosures will be supplemented as required. This document is intended for service, not filing, absent a rule, court order, or use in a discovery dispute.

1. Correct names of the parties

Kyle Douglas Moring, Petitioner; City of Mount Pleasant, Texas, Respondent.

2. Potential parties

No additional potential party is presently known or proposed.

3. Legal theories and factual bases

Petitioner seeks requestor mandamus under Texas Government Code § 552.321 on Counts I–XIII in the live First Amended Petition. In summary, Petitioner contends that the City refused or failed to supply complete nonexempt responsive public information or failed to timely pursue or complete the Attorney General process where pleaded. The count-specific bases include partial or contradictory productions, missing identified records and attachments, unresolved temporary custodian/source records, incomplete electronic searches, non-native or flattened productions where an electronic medium was requested, and the inaccessible paid Count IX production link. Petitioner's August 3, 2026 Pre-Hearing Brief, Unsworn Declaration, Pretrial Witness and Exhibit Lists, and Notice with Conditional Hearing Exhibit S organize and support the previously pleaded disputes and add no new claim, party, legal theory, or category of relief. Petitioner seeks only the relief pleaded and does not add a standalone cost-overcharge, § 552.275, Open Meetings Act, OAG-enforcement, district-attorney, criminal-prosecution, or separate vendor-cybertheft claim.

4. Economic damages

None. Petitioner seeks nonmonetary mandamus relief and costs requested under Texas Government Code § 552.323(a), subject to that section's statutory requirements. Petitioner is pro se and does not presently seek attorney's fees for his own time. The $234 payment to the City concerning Count IX is offered as production and payment context, not as economic damages or as a § 552.323 litigation cost. The final litigation-cost amount and supporting receipts will be supplemented.

5. Persons having knowledge of relevant facts

The persons below are disclosed as persons having knowledge of relevant facts; except for Petitioner, this is not a designation that Petitioner presently expects to call them. Petitioner's August 3, 2026 Pretrial Witness and Exhibit Lists identify Petitioner as the only expected case-in-chief witness.

Person	Address / telephone	Relevant knowledge
Kyle Douglas Moring	[redacted]	Requests; City responses and productions; preservation and receipt of electronic files; Message-ID and directory counts; embedded-attachment extraction; August 3, 2026 SharePoint and OAG-portal observations; request-specific omissions; remaining relief; litigation costs.
Candias Webster, Assistant City Manager / City Secretary; Records Management Officer	c/o City of Mount Pleasant, 501 North Madison Avenue, Mount Pleasant, TX 75455; 903-380-7238	Receipt, routing, certifications, estimates, production, closure and no-records communications.
Mark Buhman, MPPD Chief	c/o City of Mount Pleasant, 501 North Madison Avenue, Mount Pleasant, TX 75455; 903-575-4004	Counts I and III, including related MPPD records and records held by temporary custodians.
John Ankrum, City Building Official	c/o City of Mount Pleasant, 501 North Madison Avenue, Mount Pleasant, TX 75455; 903-575-4149	Inspection and code-compliance records, attachments, and routing relevant to Counts II, IV, VI, IX, X, and XII.
Seth Bryan / Bryan Information Technology, LLC	601 Airport Road, Suite 130, Sulphur Springs, TX 75482; (903) 689-3180	Microsoft 365 administration; Purview search/export capability; City-directed searches described in accepted records.
Austin R. Beck	Davidson Troilo Ream & Garza, P.C., 601 N.W. Loop 410, Suite 100, San Antonio, TX 78216; (210) 349-6484	Author and sender of the cited May 13, 2026 OAG correspondence concerning Count VII search results and asserted privilege review; identified as a person with knowledge of that communication only. Petitioner does not presently intend to call or subpoena him as a witness.

6. Documents, electronically stored information, and tangible things

- The file-stamped First Amended Petition; stamped Exhibit Binder Volumes 1–2; the June 23, 2026 court-returned, accepted Supplemental Exhibit Binder Volume 3; the file-stamped July 6 Notice of OAG Closure; and the August 3, 2026 file-stamped Supplemental Exhibit R (Envelope No. 118104965).
- The following documents were electronically submitted and served on August 3, 2026, in Envelope No. 118169488: Petitioner's Pretrial Witness and Exhibit Lists; Petitioner's Pre-Hearing Brief in Support of First Amended Petition for Writ of Mandamus; Unsworn Declaration of Kyle Douglas Moring; and Petitioner's Notice of Filing and Intent to Offer Conditional Hearing Exhibit S, including S-1 through S-3. The identical filing-safe Exhibit S binder was also disclosed to Respondent by email before filing.
- The original Count V City ZIP used for the file and Message-ID counts and the two unaffected original Count IX City ZIP archives, preserved in the formats received. To the best of Petitioner's knowledge, the unredacted MPPD report and the affected original Count

IX ZIP archive are no longer in his possession, custody, or control. They are excluded from his proof; he will not offer or disclose them or seek their reproduction.

- The retained non-content directory-level listing of all three Count IX City archives as delivered. It contains filenames, production paths, file types, and counts, but not the contents of the listed records.
- The defined ninety-one-file Count V comparison inventory and the specific sent/received messages on which that comparison relies, not the entire [redacted] mailbox/MBOX. Eighty-eight of those messages are dated no later than December 29, 2025; Petitioner relies only on those eighty-eight to establish the Count V omission count.
- The particular agency-produced City records tied to Counts II, VI, IX, and XII and identified in the filed or court-accepted exhibit record, not every record received from every agency.
- The reproducible Count V Message-ID inventory (362 .msg files; 230 unique Message-IDs; 132 additional files sharing a Message-ID with another produced file) and the retained non-content Count IX directory inventory (945 entries: 890 .msg files and 55 entries other than .msg files). The Count IX batch totals are 480 .msg plus 51 other entries in the March 27 archive, 290 .msg plus four PDFs in the April 21 archive, and 120 .msg in the May 21 archive. Demonstratives derived from these inventories are not independent evidence.
- The litigation-cost ledger and supporting receipts, together with eFile acceptance and service records, to be supplemented before the hearing. The $234 City receipt is included only as evidentiary production and payment context and is not included in the § 552.323 litigation-cost ledger.

The materials are maintained at Petitioner's residence and in his electronic storage, except for the excluded unredacted report and affected Count IX ZIP described above. The core pleading and exhibit volumes and Supplemental Exhibit R were filed and served through the electronic filing manager; the August 3 filings were electronically submitted and served in Envelope No. 118169488, and Exhibit S was also disclosed by email before filing. For any additional unfiled item identified above that remains within Petitioner's possession, custody, or control, Petitioner will provide an electronic copy or secure download link contemporaneously with these disclosures, or identify in writing the prior production date and method if the City already has the exact item. This commitment does not include the excluded report or affected ZIP, neither of which is within Petitioner's possession, custody, or control.

7. Indemnity and insuring agreements

None known to Petitioner.

8. Settlement agreements

None.

9. Witness statements

Petitioner's August 3, 2026 Unsworn Declaration of Kyle Douglas Moring in Support of Petitioner's Pre-Hearing Brief and his Supplemental Unsworn Declaration Authenticating Exhibit R, served August 1 and accepted and file-stamped August 3, 2026. To the extent the City-authored certifications in Supplemental Exhibit R, or signed or sent correspondence in the previously filed and served exhibit record, constitute Rule 192.3(h) witness statements, copies are contained in those previously served materials. Petitioner is not presently aware of any other Rule 192.3(h) witness statement within his possession, custody, or control.

10. Medical records and bills

Not applicable.

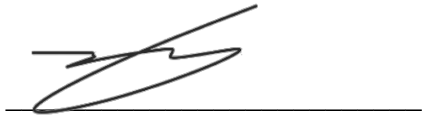
11. Medical authorization

Not applicable.

12. Responsible third party

None designated or presently alleged.

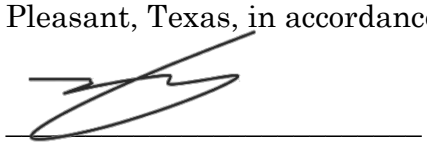
Served by:



Kyle Douglas Moring
Petitioner, Pro Se
[redacted]

CERTIFICATE OF SERVICE

I certify that on August 4, 2026, a true and correct copy of these Initial Disclosures was served electronically on all counsel and service contacts of record for Respondent City of Mount Pleasant, Texas, in accordance with the Texas Rules of Civil Procedure.



Kyle Douglas Moring