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Carin Carroll
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Titus County, Texas

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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 SUPPLEMENT TO PRETRIAL WITNESS AND EXHIBIT LISTS

Provided under Texas Rules of Civil Procedure 193.5 and 194.4 out of caution

Petitioner Kyle Douglas Moring, appearing pro se, supplements his previously filed Pretrial Witness and Exhibit Lists under Texas Rules of Civil Procedure 193.5 and 194.4, out of caution, promptly after the August 10, 2026 hearing and before the August 28, 2026 continued setting.

I. ADDITIONAL WITNESS WHO MAY BE CALLED IF THE NEED ARISES

Witness	Contact	Subject matter
Seth Bryan, Vice President, Bryan Information Technology, LLC	601 Airport Road Sulphur Springs, Texas 75482 (903) 689-3180 info@bryanitcorp.com	**Within his personal knowledge:** Bryan IT's assignment, design, execution, timing, custodians, repositories, terms and date ranges, hits, formats, attachments, and handoff for electronic searches concerning E, F, and I and, if applicable, C and G. Electronic-export capability during the relevant periods of Microsoft 365, Purview, and other City repositories it administered or searched, including individual or bulk native/source exports; preservation of metadata, routing headers, and parent/attachment relationships; embedded or cloud attachments; material licensing, configuration, or technical limits; and whether printing and rescanning was technically necessary. Identification or authentication of communications with him and ordinary-course search/export records.

This designation is limited to factual knowledge of search execution and City–Bryan IT communications. Petitioner asserts no claim or relief against Bryan IT or its personnel and seeks no access to vendor systems, credentials, or tenant data. If Respondent contends that Mr. Bryan did not perform or supervise the relevant searches, the actual operator is presently unknown to Petitioner and is believed to be known or readily ascertainable by Respondent or Bryan IT. Petitioner will promptly further supplement once that person is identified.

II. TIMING / CONDITIONAL REQUEST FOR FINDING

This supplement is served the day after the August 10 hearing and seventeen days before the continued setting. To the extent the thirty-day timing provision in Rule 194.4 applies or this witness is otherwise considered untimely, Petitioner respectfully requests findings of good cause and lack of unfair surprise or prejudice under Rule 193.6(a)–(b). The need for search-execution testimony crystallized at the August 10 hearing, when the manner and execution of further electronic searches became material to the continued hearing. Respondent uses Bryan IT, can readily obtain its contact information, and identified Bryan IT in the City's March 10 written responses as its primary Microsoft 365 technical administrator that performs complex mailbox searches at City direction. This designation concerns already-pleaded requests, adds no claim, and gives prompt advance notice of its limited factual subject matter.

III. PRIOR DESIGNATIONS

All designations in Petitioner's previously filed Pretrial Witness and Exhibit Lists remain unchanged, including Petitioner's designation of himself as a witness. This supplement adds only the witness above, adds no exhibit, and withdraws nothing. Petitioner may elect not to call this witness if Respondent supplies sufficient competent evidence concerning search execution before the continued hearing.

Petitioner respectfully requests that the Court accept this supplement and, if necessary, make the findings authorized by Rule 193.6(a)–(b), together with all further relief to which Petitioner may be entitled.

Respectfully submitted,



Kyle Douglas Moring
Petitioner, Pro Se
[redacted]

CERTIFICATE OF SERVICE

I certify that on August 11, 2026, a true and correct copy of this Supplement to Pretrial Witness and Exhibit Lists was served electronically through the electronic filing manager on all counsel and service contacts of record for Respondent City of Mount Pleasant, Texas, in accordance with Texas Rules of Civil Procedure 21 and 21a.



Kyle Douglas Moring

Automated Certificate of eService

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