Filed: 8/11/2026 8:07 PM
Carin Carroll
District Clerk
Titus County, Texas

Carin N Carroll

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 SECOND 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, further 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
Candias Webster, Assistant City Manager/City Secretary, City of Mount Pleasant	City of Mount Pleasant 501 N. Madison Mount Pleasant, Texas 75455-3650 (903) 575-4000 c/o Respondent's counsel of record	**Within her personal knowledge:** Respondent's receipt, assignment, and processing of the public information requests at issue, including the requests concerning proposed Exhibits C, E, F, G, and I; the construction, selection, and transmission of search terms and parameters for those requests; Respondent's communications with its information-technology provider concerning those searches; Respondent's statements and certifications to the Office of the Attorney General concerning those requests; the completeness, format, and medium of Respondent's productions; Respondent's records-storage, search, and export capability; and the matters addressed in her August 10, 2026 examination.

Ms. Webster is Respondent's officer and appeared and was examined at the August 10, 2026 hearing. If called by Petitioner, Ms. Webster may be examined with leading questions under Texas Rule of Evidence 611(c) as a witness identified with an adverse party. This designation is limited to factual knowledge; it adds no claim and seeks no relief against Ms. Webster individually.

II. TIMING / CONDITIONAL REQUEST FOR FINDING

This supplement is filed and served promptly after the August 10 hearing and before the continued setting. To the extent Rule 194.4(b)'s thirty-day provision

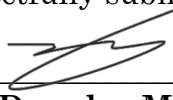
applies or this designation is otherwise deemed untimely, Petitioner respectfully requests a finding that good cause exists or, alternatively, that the supplementation will not unfairly surprise or unfairly prejudice Respondent under Rule 193.6(a)–(b). The need for this designation crystallized at the August 10 hearing, when Ms. Webster was examined and the processing and completeness of Respondent's searches became material to the continued hearing. The designation will not unfairly surprise or unfairly prejudice Respondent: the witness is Respondent's own officer, has already appeared and been examined in this same continued proceeding, and the identified subject matter corresponds to her role in the events at issue and to her August 10, 2026 examination. 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 and in Petitioner's Supplement filed August 11, 2026 remain unchanged. This supplement adds only the witness above, adds no exhibit, and withdraws nothing. Petitioner may elect not to call this witness, including if the parties' conference resolves the matters at issue or if Respondent supplies sufficient competent evidence before the continued hearing.

Petitioner respectfully requests that the Court accept this supplement and, if necessary, find that good cause exists or, alternatively, that the supplementation will not unfairly surprise or unfairly prejudice Respondent under 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 Second 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

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: 118504855
Filing Code Description: No Fee Documents
Filing Description: Petitioner???s Second Supplement to Pretrial Witness and Exhibit Lists
Status as of 8/12/2026 9:04 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Austin R. Beck		abeck@dtrglaw.com	8/11/2026 8:07:23 PM	SENT
Lea A. Ream		lream@dtrglaw.com	8/11/2026 8:07:23 PM	SENT
Marla Dial		mdial@dtrglaw.com	8/11/2026 8:07:23 PM	SENT