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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

SUPPLEMENTAL NOTICE OF PROPOSED HEARING EXHIBIT DESIGNATIONS AND MATCHING OFFER LIST

TO THE HONORABLE JUDGE OF SAID COURT:

Petitioner Kyle Douglas Moring supplements his September 9, 2026 exhibit notice for the September 18 hearing. The Court directed Petitioner to condense, separate and label his exhibits and expressly offer them. Following the September 11 conference, at which clean source copies were discussed, Petitioner proposes to offer individual documents without his added hearing-copy headers and footers. Attachment 1 is the eleven-page Matching Offer List; page 11 also maps the September 15 discovery motion's attachments to the proposed exhibits. Its parenthetical designations, such as **C(a)**, distinguish separate documents and connect them to the filed A–AD references. This updates the presentation described in Section II of the September 9 notice. The designations remain proposed and subject to the Court's labeling direction; the existing filed identifiers remain available for reference.

The ordinary review set contains the existing 66 source-document exhibits totaling 128 pages, six separately identified one-page items, and proposed **AB(e)**, a separate three-page excerpt of the May 7–12 correspondence. These 73 proposed items are identified in Attachment 1. **AB(e)** corresponds to filed AB-003–AB-005 and the motion's Attachment 2; the existing 128-page packet is unchanged. The six one-page items are two personal Finder screenshots and four prepared comparisons. The list identifies excerpts and selected pages; a filed counterpart does not mean every clean-source page was previously filed. Full sources remain available for context. The comparisons retain their filed text, figures and qualifications; the Finder captures restore the previously cropped lower portion without changing the preview or date fields. Restricted materials and the P-006/P-007 reservation remain separate. This notice adds no claim or records request, withdraws no count or prior exhibit, and does not replace the September 9 additions and corrections. The proposed discovery requests remain with the motion. Petitioner will identify each item offered, establish its foundation and request a ruling. No agreement or admission is represented.

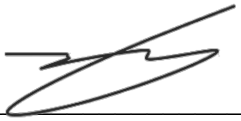
Respectfully submitted,



Kyle Douglas Moring
Petitioner, Pro Se
[redacted]

CERTIFICATE OF SERVICE

I certify that on September 15, 2026 I served a true and correct copy of this Supplemental Notice with Attachment 1, the eleven-page Matching Offer List, 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]

CAUSE NO. 44437
Kyle Douglas Moring v. City of Mount Pleasant
September 18, 2026 – Proposed Source-Document Offer List

The principal packet contains **66 separate proposed exhibits, 128 pages**. Each entry is a separate offer; multiple pages listed in one entry stay together. No exhibit is represented as admitted.

The letters preserve the connection to the filed **A–AD** set. Parenthetical letters identify separate source documents, for example **C(a)**. These are proposed hearing designations, subject to the Court's labeling direction. They do not replace the filed page labels or create another numbered **PR** series.

"Print pages" are positions in the 128-page printing PDF. "Document pages" are the selected pages of the retained reading document; they are not new labels printed on the evidence. MSG/EML documents are conventional reading printouts of retained email. Selected pages are unchanged. The full reading documents remain available for context. Filed references identify source counterparts, not an assertion that every clean-source page was previously filed. Attachments and enclosures are not included unless separately identified.

1. Chief call records – Count(s) III

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
C(a)	December 4, 2025 personal-phone call and voicemail request **1 page(s).** Document pages 1 of 1.	1	C, p. 1
C(b)	December 17, 2025 Buhman internal response and quoted request **1 page(s).** Document pages 1 of 3. Excerpt; full document retained.	2	C, p. 2
C(c)	December 17, 2025 Moring follow-up and quoted correspondence **2 page(s).** Document pages 1–2 of 3. Excerpt; full document retained.	3–4	C, p. 3
AB(a)	City-produced call screenshot – John Beasley **1 page(s).** Document pages 1 of 1.	5	AB, p. 1
AB(b)	City-produced call screenshot – Carrie Mahon **1 page(s).** Document pages 1 of 1.	6	AB, p. 2
R(b)	June 2, 2026 City OAG-records delivery and closure **1 page(s).** Document pages 1 of 7. Excerpt; full document retained.	7	R, p. 3; AB, p. 6

2. Moring and Walmart searches – Count(s) V, VI

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
E(a)	December 30, 2025 name and keyword records request **3 page(s).** Document pages 1–3 of 3.	8–10	E, pp. 1–2
E(b)	February 2, 2026 Moring-related production delivery **2 page(s).** Document pages 1–2 of 5. Excerpt; full document retained.	11–12	E, p. 3
F(a)	December 30, 2025 Walmart-related records request **3 page(s).** Document pages 1–3 of 3.	13–15	F, pp. 1–3
F(b)	February 2, 2026 Walmart-related production delivery **2 page(s).** Document pages 1–2 of 6. Excerpt; full document retained.	16–17	F, p. 4
E(c)	January 12, 2026 Webster assignment of the two keyword requests **1 page(s).** Document pages 1 of 7. Parent message only. Its two attached requests are printed separately as E(a) and F(a).	18	E, p. 4
E(d)	March 10, 2026 City email-platform response **3 page(s).** Document pages 1–3 of 3.	19–21	E, pp. 5–7
E(g)	September 15, 2025 Webster request to Seth Bryan concerning inspector records **1 page(s).** Document pages 1 of 4. Excerpt; full document retained.	22	E, p. 12
Y(c)	January Moring search statistics **1 page(s).** Document pages 1 of 1.	23	Y, p. 10
Y(d)	January Moring search conditions **1 page(s).** Document pages 1 of 1.	24	Y, p. 11
Y(f)	Walmart search conditions **1 page(s).** Document pages 1 of 1.	25	Y, p. 13
E(e)	December 30 SFMO internal forward containing December 22, 2025 referral to MPFD **1 page(s).** Document pages 1 of 3. Referral and forwarding text on page 1; attached evidence binder is not part of this offer.	26	E, p. 8
F(d)	January–April 2025 Axon evidence-request text-message export **2 page(s).** Document pages 1, 4 of 16. Two page excerpts from the 16-page message export; no claim that every linked upload was completed.	27–28	F, p. 6

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
F(i)	City-produced scanned Ramirez inspection email correspondence **7 page(s).** Document pages 1–7 of 7. Complete seven-page City-produced scan retained as the format example.	29–35	F, p. 10
F(m)	September 2, 2025 2:28 PM Ankrum permit-history transmittal to Titus CAD **3 page(s).** Document pages 1–3 of 3.	36–38	F, p. 14

3. Police case records and native email – Count(s) I

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
A(a)	November 13, 2025 records request **2 page(s).** Document pages 1–2 of 2.	39–40	A, pp. 1–2
A(b)	December 3, 2025 Nipp response and quoted correspondence **4 page(s).** Document pages 1–4 of 8. Excerpt; full document retained.	41–44	A, p. 3
A(c)	Nipp February 6, 2026 case transmittal, forwarded by Bailey April 5, 2026 **1 page(s).** Document pages 1 of 1. Forwarding email and attachment inventory only; [redacted] attachments are kept separately.	45	A, p. 4
A(g)	November 14, 2025 Webster assignment to Seth Bryan **1 page(s).** Document pages 1 of 3. Excerpt; full document retained.	46	A, p. 5

4. Regulatory correspondence and access – Count(s) IX; also II, V, VI

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
I(a)	February 8, 2026 regulatory-agency correspondence request **2 page(s).** Document pages 1–2 of 2.	47–48	I, pp. 1–2
I(b)	May 21, 2026 City delivery email and quoted request **1 page(s).** Document pages 1 of 4. Excerpt; full document retained.	49	I, p. 3
I(q)	September 17, 2025 DSHS reply to Juan Ramirez **1 page(s).** Document pages 1 of 1.	50	I, p. 24
I(o)	August 20, 2025 DSHS email to John Ankrum **1 page(s).** Document pages 1 of 1.	51	I, p. 21
I(p)	July 28, 2025 DSHS Notice of Inspectional Observations, inspection 308620 **2 page(s).** Document pages 1–2 of 2.	52–53	I, pp. 22–23
V(b)	October 27, 2025 EPA–TCEQ–MPPD forwarded correspondence and attachment inventory **3 page(s).** Document pages 1–3 of 3.	54–56	V, pp. 2–3
V(c)	October 28, 2025 Amber James to Randall Hodo – video – May 21 production copy **1 page(s).** Document pages 1 of 1.	57	V, p. 4
AC(b)	May 28, 2026 saved access-error page **1 page(s).** Document pages 1 of 1.	58	AC, p. 2
AC(c)	August 26, 2026 saved access-error page **1 page(s).** Document pages 1 of 1.	59	AC, p. 3

5. City attorney records and latest response – Count(s) VII; AA(a) also III, V, VI, IX

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
G(a)	February 14, 2026 attorney-records request **2 page(s).** Document pages 1–2 of 2.	60–61	G, pp. 1–2
G(b)	March 6, 2026 Beck production-status response and quoted request **1 page(s).** Document pages 1 of 6. Excerpt; full document retained.	62	G, p. 3
G(c)	May 13, 2026 Beck ruling-request email forwarded by Richardson and Bailey **2 page(s).** Document pages 1–2 of 3. Pages 1–2 contain the transmittal, Beck statement and preceding inquiry; blank last page omitted.	63–64	G, p. 4
AA(a)	August 27, 2026 City response letter **5 page(s).** Document pages 1–5 of 5. Complete five-page letter; enclosures are separate records. Full 30-page parent retained.	65–69	AA, pp. 1–5

6. October 28 inspection – Count(s) II

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
B(a)	October 29, 2025 inspection-visit records request **1 page(s).** Document pages 1 of 1.	70	B, p. 1
B(c)	November 13, 2025 Webster explanation and preceding correspondence **2 page(s).** Document pages 1–2 of 8. Excerpt; full document retained.	71–72	B, p. 3
B(d)	November 13, 2025 Ankrum internal inspection explanation **1 page(s).** Document pages 1 of 8. Excerpt; full document retained.	73	B, p. 4
B(e)	October 28, 2025 inspection report and record history **3 page(s).** Document pages 1–3 of 3.	74–76	B, pp. 5–7

7. January 13 inspection – Count(s) IV

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
D(a)	January 13, 2026 inspection records request **1 page(s).** Document pages 1 of 1.	77	D, p. 1
D(b)	January 21, 2026 City delivery and quoted request **1 page(s).** Document pages 1 of 3. Excerpt; full document retained.	78	D, p. 2
D(c)	January 21, 2026 specific follow-up **3 page(s).** Document pages 1–3 of 7. Excerpt; full document retained.	79–81	D, pp. 3–4
D(d)	January 13, 2026 grocery inspection report **5 page(s).** Document pages 1–5 of 5.	82–86	D, pp. 5, 8

8. January 9 fire inspection – Count(s) VIII

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
H(a)	February 13, 2026 fire-inspection records request **3 page(s).** Document pages 1–3 of 3.	87–89	H, pp. 1–3
H(b)	March 3, 2026 City fire-records response and quoted request **5 page(s).** Document pages 1–5 of 5.	90–94	H, pp. 4–7
H(c)	January 9, 2026 fire-inspection report **4 page(s).** Document pages 1, 5, 9–10 of 10. Report pages 1, 5, 9 and 10; six intervening report pages retained in full context.	95–98	H, pp. 8–10

9. Ankrum call records – Count(s) X

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
L(a)	May 13, 2026 request for Ankrum call records **2 page(s).** Document pages 1–2 of 2.	99–100	L, pp. 1–2
L(b)	Retained John Ankrum call image **1 page(s).** Document pages 1 of 1.	101	L, p. 3
L(d)	City-supplied call-history screenshots **1 page(s).** Document pages 1 of 1.	102	L, p. 5
L(e)	May 15, 2026 follow-up and supplemental call-record request **2 page(s).** Document pages 1–2 of 5. Excerpt; full document retained.	103–104	L, pp. 6–7

10. City phone lines – Count(s) XI

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
M(a)	December 4, 2025 clarified City-managed call-record request **1 page(s).** Document pages 1 of 4. Excerpt; full document retained.	105	M, p. 1
M(d)	December 29, 2025 request to identify the Chief office line **2 page(s).** Document pages 1–2 of 9. Excerpt; full document retained.	106–107	M, p. 7
M(e)	March 10, 2026 later City call-record delivery **1 page(s).** Document pages 1 of 5. Excerpt; full document retained.	108	M, p. 8

11. July complaint records – Count(s) XII

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
O(a)	July 30, 2025 code-compliance records request **1 page(s).** Document pages 1 of 1.	109	O, p. 1
O(b)	July 25, 2025 complaint-submission confirmation **2 page(s).** Document pages 1–2 of 2.	110–111	O, p. 2
O(c)	July 26, 2025 complaint-submission confirmation **1 page(s).** Document pages 1 of 1.	112	O, p. 3
O(d)	August 4, 2025 City complaint-record response **1 page(s).** Document pages 1 of 7. Excerpt; full document retained.	113	O, p. 4
O(e)	July 28, 2025 inspection letter FS-473357 **1 page(s).** Document pages 1 of 1.	114	O, p. 5

12. Ordinance development records – Count(s) XIII

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
P(a)	November 25, 2025 Ordinance 2025-24 records request **1 page(s).** Document pages 1 of 1.	115	P, p. 1
P(b)	November 25, 2025 City ordinance-request response **1 page(s).** Document pages 1 of 2. Excerpt; full document retained.	116	P, p. 2
P(c)	November 26, 2025 ordinance delivery and closure **1 page(s).** Document pages 1 of 3. Excerpt; full document retained.	117	P, p. 3
P(e)	Agenda Item Report AIR-25-364 and attached ordinance **1 page(s).** Document pages 1 of 5. Agenda Item Report page only; attached ordinance retained in full context.	118	P, p. 4
P(f)	November 26, 2025 follow-up on remaining ordinance records **2 page(s).** Document pages 1–2 of 4. Excerpt; full document retained.	119–120	P, p. 5

13. Inspection platform capability – Count(s) II, IV, VI, VIII, IX

Sticker	Document and exact selection	Print pages	Filed A–AD counterpart
Z(b)	Executed HS GovTech agreement **8 page(s).** Document pages 2, 6, 8–9, 15–18 of 23. Agreement excerpts include parties, ownership, decommissioning conditions, execution and scope/support. Full 23 pages retained.	121–128	Z, pp. 2–3, 5–9

Additional items – keep separate

These six one-page items are in the separate six-page printing PDF. They are additional proposed offers only. The four comparisons are identified as prepared work, not City-created records. The two Finder captures are personal screenshots, not an expert determination of creation or alteration.

Sticker	Item	Additional PDF page
AB(c)	**September 7, 2026 Finder information screenshot – John Beasley** Personal Finder screenshot	1
AB(d)	**September 7, 2026 Finder information screenshot – Carrie Mahon** Personal Finder screenshot	2
E(h)	**Prepared comparison of February and March email productions** Prepared comparison; software/ChatGPT assistance disclosed	3
V(d)	**Prepared comparison of video email versions** Prepared comparison; software/ChatGPT assistance disclosed	4
AD(a)	**Prepared August 28 USB inventory** Prepared comparison; software/ChatGPT assistance disclosed	5
AD(b)	**Prepared comparison of earlier downloads and the August USB** Prepared comparison; software/ChatGPT assistance disclosed	6

Restricted records retained separately

A(d): six-page police report; [redacted] **P(g):** five-page internal ordinance email chain. These 17 pages are **not** in either ordinary printing PDF. Their use, any redactions and the appropriate procedure must be addressed before tender. **P(g)** corresponds to the reservation concerning filed-series P-006/P-007; the retained clean chain contains additional context. No privilege waiver or permission for public disclosure is assumed.

Completeness and later production

Full source material is retained for any necessary context. Later-received copies are credited. A request, a closure email, a different file format, a failed link or an unmatched file identifier does not by itself establish that a responsive record remains unproduced. Each offer remains subject to foundation, relevance and any specific objection.

Supplementary correspondence and motion cross-reference

The proposed hearing set contains 73 items: the existing 66 source exhibits (128 pages), six additional one-page items, and the separate three-page **AB(e)** excerpt below. Existing source-packet pages 1–128 and all earlier designations remain unchanged.

Sticker	Document and exact selection	Location / filed counterpart
AB(e)	May 12, 2026 Webster email to Richardson and Beck, with May 7–8 quoted correspondence. Three pages: source pages 1–3 of the retained 11-page chain. Excerpt; full chain available.	Separate AB(e) PDF, pages 1–3. Filed AB-003–AB-005. Count III; related native-format context.

AB(e) may be offered with the Chief-call materials after **AB(b)** and before **R(b)**, subject to the Court's direction. Attachments named in the email are not included in this excerpt; the selected call images remain **AB(a)** and **AB(b)**.

September 15 discovery motion attachments

"Motion PDF" means physical pages of the 26-page September 15 motion. These references identify counterparts; they do not assert identical page formatting or admission of any item.

Motion attachment	Motion PDF	Proposed item	Location in offer set
1 – proposed requests	9–15	No exhibit designation	Proposal remains with motion.
2 – May correspondence	16–18	AB(e)	Separate AB(e) PDF, pp. 1–3.
3, pp. 1–3	19–21	E(d)	Main packet, pp. 19–21.
3, p. 4	22	E(c)	Main packet, p. 18.
3, p. 5	23	A(g)	Main packet, p. 46.
3, p. 6	24	E(g)	Main packet, p. 22.
3, p. 7	25	E(h)	Six-page additional PDF, p. 3.
3, p. 8	26	AA(a), document p. 3	Main packet, p. 67, within full five-page letter.

The seven proposed discovery requests are requested relief. The listed source records and prepared comparison remain subject to their own foundation, purpose, objections and ruling.

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: 119917234
Filing Code Description: Motion (No Fee)
Filing Description: Petitioner???s Motion for Limited Discovery, Preservation, and Deferral
Status as of 9/15/2026 11:36 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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