Filed: 9/16/2026 5:37 PM
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 SECOND SUPPLEMENTAL NOTICE OF LATER-OBTAINED RECORD RELEVANT TO COUNT IX AND PROPOSED EXHIBIT I(r)

TO THE HONORABLE JUDGE OF SAID COURT:

Petitioner Kyle Douglas Moring gives notice of one later-obtained, specifically identifiable record relevant to Count IX and requests permission, to the extent necessary, to offer it at the September 18 hearing as proposed **Exhibit I(r)**.

I. LATER-OBTAINED RECORD

1. On September 16, 2026, [another requestor] provided Petitioner a native MSG file that [that requestor] identified as part of a TCEQ production received that day. Petitioner states this history to explain when and how he received the copy; he retains the native file.

2. The record is Erin Marshall's November 14, 2025 email to TCEQ investigator Amy Camp, subject 'Re: Septic tank issue at RV park.' It responds to Ms. Camp's request for the park's name and location. The retained native file supplies the exact Message-ID used for the comparison described below; Attachment 1 is the readable PDF printout of the email.

II. RELATION TO COUNT IX

3. Count IX concerns Petitioner's February 8, 2026 request for City correspondence with regulatory agencies from May 1, 2025 through the date of the City's search. The request expressly includes TCEQ, the Utilities and Wastewater departments, emails and attachments, responses to agency inquiries, and permit-related correspondence and supporting materials. See First Amended Petition paragraphs 80-84 and filed Exhibit I, pages 1-2.

4. The November 14 message is facially within that scope: it is a City Utilities Director's email to TCEQ, responds to a TCEQ inquiry, concerns a septic issue, and existed before the February 9, 2026 date used in the City's disclosed query. It is

therefore one concrete example relevant to Count IX's existing dispute over missing outgoing agency correspondence and search completeness.

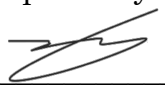
5. Petitioner compared the exact Message-ID, subject and distinctive body text against the City production sets received March 27, April 21, May 21, August 4, August 14, August 25 and August 28, 2026, and found no match. This limited comparison identifies one record; it does not define the full responsive population.

III. ATTACHMENT AND REQUEST

6. Attachment 1 is the supplied three-page PDF printout. It displays the email's headers, complete visible text, quoted thread and location images. Petitioner retains the native MSG for authentication and inspection and does not represent that the printout contains every item referenced in the email.

7. Petitioner requests leave, if required, to add this record to the Count IX offers as **I(r)** and 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 based on the September 16 receipt, immediate service, narrow scope, and the City's authorship. This notice does not itself admit the attachment; Petitioner will establish its foundation and request a ruling.

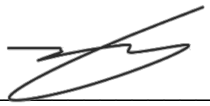
Respectfully submitted,



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 Second Supplemental Notice and Attachment 1 through eFileTexas electronic service on Austin R. Beck and Lea A. Ream, counsel for Respondent, with Marla Dial copied and all other required service contacts of record included, in accordance with Texas Rule of Civil Procedure 21a.



Kyle Douglas Moring
Petitioner, Pro Se

From: **Erin Marshall** emarshall@mpcity.org
Subject: Re: Septic tank issue at RV park
Date: November 14, 2025 at 9:34 AM
To: Amy Camp Amy.Camp@tceq.texas.gov

EM

I sent you two pictures. It doesn't have a sign of a name but I got a copy of the billing information from county water. The only address is their private rd address and I sent a pin drop that has the address with gps.

Sent from my Verizon, Samsung Galaxy smartphone
Get Outlook for Android

From: Amy Camp <Amy.Camp@tceq.texas.gov>
Sent: Friday, November 14, 2025 9:04:00 AM
To: Erin Marshall <emarshall@mpcity.org>
Subject: Septic tank issue at RV park

CAUTION: [EXTERNAL EMAIL]

Hi Erin, what was the name and location of that park?

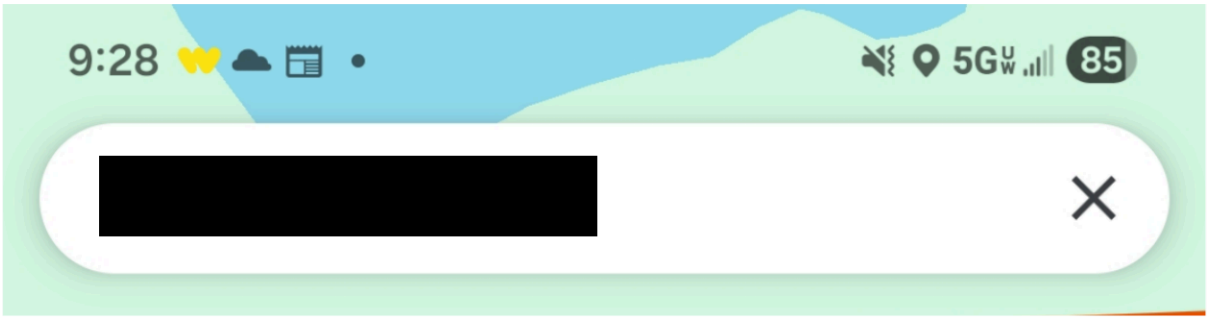
Thank you,

Amy Camp

Environmental Investigator
Texas Commission on Environmental Quality – Region 5
2916 Teague Dr., Tyler, TX 75701
Office: (903) 535-5109
Fax: (903) 525-0384
Amy.Camp@tceq.texas.gov

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Envelope ID: 120015431
Filing Code Description: Notice
Filing Description: Petitioner???s Second Supplemental Notice of Later-Obtained Record Relevant to Count IX and Proposed Exhibit I(r)
Status as of 9/17/2026 9:33 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Austin R. Beck		abeck@dtrglaw.com	9/16/2026 5:37:58 PM	SENT
Lea A. Ream	16636750	lream@dtrglaw.com	9/16/2026 5:37:58 PM	SENT
Marla Dial		mdial@dtrglaw.com	9/16/2026 5:37:58 PM	SENT