Filed: 8/3/2026 12:00 AM
Carin Carroll
District Clerk
Titus County, Texas
Debbie Swindler

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 NOTICE OF FILING AND INTENT TO OFFER SUPPLEMENTAL EXHIBIT R RELATING TO PREVIOUSLY PLEADED COUNTS I, III, IV, V, AND XIII

TO THE HONORABLE JUDGE OF SAID COURT:

Petitioner Kyle Douglas Moring files this Notice of Filing and Intent to Offer Supplemental Exhibit R and respectfully shows the Court as follows:

1. The Court has set an in-person expedited hearing or submission on Petitioner's First Amended Petition for Writ of Mandamus for August 10, 2026, at 9:00 a.m. Petitioner files this Notice to give advance notice of a limited set of City-authored documents that he intends to offer, subject to the Court's evidentiary rulings.

2. On July 2, 2026, the Office of the Attorney General transmitted records to Petitioner in response to Public Information Request No. R032947. The accompanying OAG letter states that the request was received June 16, 2026 and that responsive documents were attached. The two-page transmittal and attachment list are attached as Exhibit R-1.

3. The OAG-produced files contain five one-page forms titled Public Information Request Certification. Each form identifies Candias Webster as the Public Information Officer or authorized representative, bears a blue-script signature reading "Candias Webster" and the date April 27, 2026, and selects the statement that the governmental body made available to the requestor all

existing responsive information that it owns, controls, or has a right of access to.

4. The five forms correspond directly to Counts I, III, IV, V, and XIII already pleaded in the First Amended Petition, as shown in the table below. They bear on the count-specific questions whether each request was completely satisfied and whether any asserted mootness has been established when compared with the identified omissions, format issues, and remaining categories in the filed record.

Exhibit / Count	OAG ID	Previously pleaded request	Date entry on form
R-2 / I	OR-25-055840-IC	MPPD Case Nos. [redacted] and 25-17553	12/2/25
R-3 / III	OR-25-059503-IC	Chief Buhman temporary-custodian records	12/17/26 (as written)
R-4 / IV	OR-26-004942-IC	January 13, 2026 Walmart inspection records	1/21/26
R-5 / V	OR-26-006368-IC	Moring / OSHA keyword-search records	2/2/26
R-6 / XIII	OR-25-057987-IC	Ordinance 2025-24 records	11/26/25

5. Petitioner does not contend that a certification, standing alone, proves that any particular responsive record was omitted or establishes anyone's intent. The Count III form's date entry is reproduced as "12/17/26" exactly as written; Petitioner asks the Court to draw no inference in this Notice about why that date appears on the form.

6. This filing adds no count, claim, party, legal theory, or category of requested relief. It does not ask the Court to adjudicate the section 552.3215 administrative complaint process, review the OAG's conduct, find fraud, perjury, bad faith, or intent, or recognize a generalized right to search-methodology declarations apart from the pleaded mandamus disputes.

7. The OAG transmitted these documents after the Court accepted Supplemental Exhibit Binder Volume 3 on June 23, 2026. Petitioner files and serves them in advance of the scheduled hearing so that Respondent has notice. Each form identifies and bears a signature in the name of a City official, and the OAG produced the forms from the identified complaint files.

8. Petitioner authenticates the provenance and extraction of Exhibit R through the separately filed Supplemental Unsworn Declaration of Kyle Douglas Moring and, if the Court receives live evidence, through his testimony. Filing the documents does not itself admit them into evidence; Petitioner will formally offer them at the hearing if the matter proceeds by live hearing.

9. If the matter is considered by submission, Petitioner respectfully requests that the Court consider Exhibit R subject to any timely objection and the Court's evidentiary rulings. In either event, Petitioner relies on Exhibit R only for the previously pleaded, request-specific completeness and mootness disputes described above.

10. Petitioner respectfully gives notice of his intent to offer Supplemental Exhibit R for the limited purposes stated in this filing and requests all further relief to which he is entitled on the existing pleadings.

Respectfully submitted,



Kyle Douglas Moring

Petitioner, Pro Se

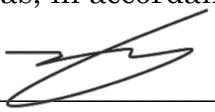
[redacted]

[redacted]

[redacted] | [redacted]

CERTIFICATE OF SERVICE

I certify that on August 1, 2026, a true and correct copy of this Notice, the Supplemental Unsworn Declaration of Kyle Douglas Moring, and Supplemental Exhibit R 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

SUPPLEMENTAL EXHIBIT R INDEX

OAG certification evidence relating to pleaded Counts I, III, IV, V, and XIII

Exhibit	Description	Length
R-1	July 2, 2026 OAG / Public Records Center transmittal for PIR R032947-061626, including the OAG letter and attachment list	2 pages
R-2	City Public Information Request Certification, OR-25-055840-IC, relating to pleaded Count I	1 page
R-3	City Public Information Request Certification, OR-25-059503-IC, relating to pleaded Count III	1 page
R-4	City Public Information Request Certification, OR-26-004942-IC, relating to pleaded Count IV	1 page
R-5	City Public Information Request Certification, OR-26-006368-IC, relating to pleaded Count V	1 page
R-6	City Public Information Request Certification, OR-25-057987-IC, relating to pleaded Count XIII	1 page

The seven exhibit pages following this index are appended in their original PDF form. The exhibit designations are supplied by this index and the combined PDF bookmarks; the source-page content itself has not been retyped or altered.

From: **TEXAS AG Public Information** texasag@govqa.us
Subject: [Records Center] Public Information Request :: R032947-061626
Date: July 2, 2026 at 12:48 PM
To: [redacted]

Attachments:
22._OR-26-027775-IC.pdf
0._FW__Notice_of_Mandamus_Filing_Submission_-_City_of_Mount_Pleasant___OAG_File_No._L260017200.pdf-Redacted.pdf
18._OR-26-014482-IC.pdf
15._OR-26-009839-IC.pdf
4._OR-25-055852-CC.pdf
15day_R032947_.pdf
17._OR-26-013327-IC.pdf
24._OR-26-031663-IC.pdf
10._OR-25-059503-IC.pdf
23._OR-26-028637-IC.pdf
R032947.pdf
16._OR-26-009838-IC.pdf
8._OR-25-058955-IC.pdf
27._OR-26-031653-IC.pdf
14._OR-26-006367-CC.pdf
20._OR-26-016154-CC.pdf
19._OR-26-014805-IC.pdf
26._OR-26-031655-IC.pdf
12._OR-26-006369-IC.pdf
21._OR-26-022171-IC.pdf
3._OR-25-044070-CC.pdf
2._OR-25-036830-CC.pdf
25._OR-26-031661-IC.pdf
1._OR-25-034390-IC.pdf
13._OR-26-006368-IC.pdf
11._OR-26-004942-IC.pdf
6._OR-25-057990-IC.pdf
7._OR-25-057987-IC.pdf
9._OR-26-000002-IC.pdf
5._OR-25-055840-IC_Redacted.pdf

--- Please respond above this line ---

July 2, 2026

Mr. Kyle Moring
[redacted]
VIA E-MAIL ONLY

Re: Public Information Request No. R032947

Dear Mr. Moring:

This e-mail is in response to your public information request to the Office of the Attorney General ("OAG"), received by the OAG on June 16, 2026.

The OAG has reviewed its files and has located the attached documents that are responsive to your request. Although the Public Information Act allows a governmental body to charge for providing documents under certain circumstances, the attached documents are being provided to you at no charge.

Please note, however, that the OAG has redacted dates of birth from the attached documents pursuant to the previous determination issued by the Open Records Division in Open Records Letter No. 2016-17399 (2016). See also Open Records Decision No. 673 (2001) (providing that Open Records Division can issue two types of previous determinations to governmental bodies).

The OAG has also withheld those documents that were submitted to the Open Records Division for review under section 552.301(e)(1)(D) of the Government Code. The OAG is prohibited by section 552.3035 of the Government Code from disclosing to the requestor or any member of the public the information that is submitted to the Open Records Division for a ruling. See Gov't Code § 552.3035.

Finally, the remaining information responsive to your request is excepted from required public disclosure. Pursuant to section 552.301 of the Government Code, the OAG has requested a ruling from the Open Records Division. A copy of our brief to the Open Records Division is attached.

If you have any questions, please contact publicrecords@oag.texas.gov.

Sincerely,

Sarah Aleman
Public Information Coordinator's Office
Office of the Attorney General

To monitor the progress or update this request please log into the Public Records Center



PUBLIC INFORMATION REQUEST CERTIFICATION

OAG ASSIGNED ID# OR-25-055840-IC

PLEASE SELECT **ONE** OF THE FOLLOWING:

☑	I certify the governmental body has made available to the requestor all existing responsive information that this governmental body owns, controls, or has a right of access to. The information was provided to the requestor on 12/2/25 via the following method (select one): E-mail If the information was not released to the requestor within 10 business days of receiving the request, please provide a copy of the notice provided to the requestor pursuant to section 552.221(d) of the Government Code.
☐	I certify the governmental body has supplied the requestor all existing responsive information for which the governmental body is not claiming an exception, and has requested an attorney general's decision regarding the responsive information the governmental body believes is excepted from disclosure. The ruling request was submitted to the Attorney General's Office on _____ via the following method (select one): ___ The governmental body's internal reference number is _____.
☐	I certify the governmental body has conducted a good faith search of information that this governmental body owns, controls, or has a right of access to, and has found no such information that is responsive to the requestor's public information request. The requestor was notified the governmental body does not maintain the requested information on _____. Please provide a copy of the notice provided to the requestor.
☐	The information at issue was withheld pursuant to a previous determination. The requestor was notified the information was being withheld pursuant to a previous determination on _____. Please provide a copy of the notice provided to the requestor.
☐	None of the situations listed above apply. I have attached documentation explaining how the governmental body responded to the referenced request, including a timeline of the governmental body's response to the requestor.

Public Information Officer, or Authorized Representative: Candias Webster

Candias Webster	Assistant City Manager/ City Secretary	04/27/2026
Signature	Title	Date

PUBLIC INFORMATION REQUEST CERTIFICATION

OAG ASSIGNED ID# OR-25-059503-IC

PLEASE SELECT **ONE** OF THE FOLLOWING:

☑	I certify the governmental body has made available to the requestor all existing responsive information that this governmental body owns, controls, or has a right of access to. The information was provided to the requestor on 12/17/26 via the following method (select one): E-mail If the information was not released to the requestor within 10 business days of receiving the request, please provide a copy of the notice provided to the requestor pursuant to section 552.221(d) of the Government Code.
☐	I certify the governmental body has supplied the requestor all existing responsive information for which the governmental body is not claiming an exception, and has requested an attorney general's decision regarding the responsive information the governmental body believes is excepted from disclosure. The ruling request was submitted to the Attorney General's Office on _____ via the following method (select one): ___ The governmental body's internal reference number is _____.
☐	I certify the governmental body has conducted a good faith search of information that this governmental body owns, controls, or has a right of access to, and has found no such information that is responsive to the requestor's public information request. The requestor was notified the governmental body does not maintain the requested information on _____. Please provide a copy of the notice provided to the requestor.
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☐	None of the situations listed above apply. I have attached documentation explaining how the governmental body responded to the referenced request, including a timeline of the governmental body's response to the requestor.

Public Information Officer, or Authorized Representative: Candias Webster

Candias Webster	Assistant City Manager/ City Secretary	04/27/2026
Signature	Title	Date

PUBLIC INFORMATION REQUEST CERTIFICATION

OAG ASSIGNED ID# OR-26-004942-IC

PLEASE SELECT **ONE** OF THE FOLLOWING:

☑	I certify the governmental body has made available to the requestor all existing responsive information that this governmental body owns, controls, or has a right of access to. The information was provided to the requestor on 1/21/26 via the following method (select one): E-mail If the information was not released to the requestor within 10 business days of receiving the request, please provide a copy of the notice provided to the requestor pursuant to section 552.221(d) of the Government Code.
☐	I certify the governmental body has supplied the requestor all existing responsive information for which the governmental body is not claiming an exception, and has requested an attorney general's decision regarding the responsive information the governmental body believes is excepted from disclosure. The ruling request was submitted to the Attorney General's Office on _____ via the following method (select one): ___ The governmental body's internal reference number is _____.
☐	I certify the governmental body has conducted a good faith search of information that this governmental body owns, controls, or has a right of access to, and has found no such information that is responsive to the requestor's public information request. The requestor was notified the governmental body does not maintain the requested information on _____. Please provide a copy of the notice provided to the requestor.
☐	The information at issue was withheld pursuant to a previous determination. The requestor was notified the information was being withheld pursuant to a previous determination on _____. Please provide a copy of the notice provided to the requestor.
☐	None of the situations listed above apply. I have attached documentation explaining how the governmental body responded to the referenced request, including a timeline of the governmental body's response to the requestor.

Public Information Officer, or Authorized Representative: Candias Webster

Candias Webster	Assistant City Manager/ City Manager	04/27/2026
Signature	Title	Date

PUBLIC INFORMATION REQUEST CERTIFICATION

OAG ASSIGNED ID# OR-26-006368-IC

PLEASE SELECT **ONE** OF THE FOLLOWING:

☑	I certify the governmental body has made available to the requestor all existing responsive information that this governmental body owns, controls, or has a right of access to. The information was provided to the requestor on 2/2/26 via the following method (select one): E-mail If the information was not released to the requestor within 10 business days of receiving the request, please provide a copy of the notice provided to the requestor pursuant to section 552.221(d) of the Government Code.
☐	I certify the governmental body has supplied the requestor all existing responsive information for which the governmental body is not claiming an exception, and has requested an attorney general's decision regarding the responsive information the governmental body believes is excepted from disclosure. The ruling request was submitted to the Attorney General's Office on _____ via the following method (select one): ___ The governmental body's internal reference number is _____.
☐	I certify the governmental body has conducted a good faith search of information that this governmental body owns, controls, or has a right of access to, and has found no such information that is responsive to the requestor's public information request. The requestor was notified the governmental body does not maintain the requested information on _____. Please provide a copy of the notice provided to the requestor.
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☐	None of the situations listed above apply. I have attached documentation explaining how the governmental body responded to the referenced request, including a timeline of the governmental body's response to the requestor.

Public Information Officer, or Authorized Representative: Candias Webster

Candias Webster	Assistant City Manager/ City Secretary	04/27/2026
Signature	Title	Date

PUBLIC INFORMATION REQUEST CERTIFICATION

OAG ASSIGNED ID# OR-25-057987-IC

PLEASE SELECT **ONE** OF THE FOLLOWING:

☑	I certify the governmental body has made available to the requestor all existing responsive information that this governmental body owns, controls, or has a right of access to. The information was provided to the requestor on 11/26/25 via the following method (select one): E-mail If the information was not released to the requestor within 10 business days of receiving the request, please provide a copy of the notice provided to the requestor pursuant to section 552.221(d) of the Government Code.
☐	I certify the governmental body has supplied the requestor all existing responsive information for which the governmental body is not claiming an exception, and has requested an attorney general's decision regarding the responsive information the governmental body believes is excepted from disclosure. The ruling request was submitted to the Attorney General's Office on _____ via the following method (select one): ___ The governmental body's internal reference number is _____.
☐	I certify the governmental body has conducted a good faith search of information that this governmental body owns, controls, or has a right of access to, and has found no such information that is responsive to the requestor's public information request. The requestor was notified the governmental body does not maintain the requested information on _____. Please provide a copy of the notice provided to the requestor.
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☐	None of the situations listed above apply. I have attached documentation explaining how the governmental body responded to the referenced request, including a timeline of the governmental body's response to the requestor.

Public Information Officer, or Authorized Representative: Candias Webster

Candias Webster	Assistant City Manager/ City Secretary	04/27/2026
Signature	Title	Date

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: 118104965
Filing Code Description: Notice
Filing Description: Notice of Filing Supplemental Exhibit R
Status as of 8/3/2026 9:19 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Austin R. Beck		abeck@dtrglaw.com	8/1/2026 10:24:34 AM	SENT
Lea A. Ream		lream@dtrglaw.com	8/1/2026 10:24:34 AM	SENT
Marla Dial		mdial@dtrglaw.com	8/1/2026 10:24:34 AM	SENT