Filed: 9/18/2026 7:30 AM
Carin Carroll
District Clerk
Titus County, Texas
Jeffrey McClendon

CAUSE NO. 44437

KYLE DOUGLAS MORING *Petitioner,*	§ §	IN THE DISTRICT COURT
vs.	§	TITUS COUNTY, TEXAS
CITY OF MOUNT PLEASANT, TEXAS *Respondent.*	§ §	76th JUDICIAL DISTRICT

RESPONDENT'S OBJECTIONS AND RESPONSES TO PETITIONER'S PROPOSED EXHIBITS FOR SEPTEMBER 18 HEARING

TO THE HONORABLE JUDGE OF SAID COURT:

Subject to Respondent's Plea to the Jurisdiction, now comes the City of Mount Pleasant, Texas (hereinafter, "the City"), Respondent in the above-styled and -numbered cause, the City hereby provides its Objections and Responses to Petitioner's proposed exhibits for a September 18, 2026, hearing on his First Amended Petition for a Writ of Mandamus and in support thereof shows as follows:

1. Following the hearing on September 4, 2026, the Court ordered Petitioner to provide his proposed exhibits to Respondent for the City's review and to allow Petitioner and Respondent to confer regarding the admissibility of his proposed exhibits.

2. On September 8, 2026, Petitioner delivered proposed exhibits to the City. On September 11, 2026, Petitioner and Respondent conferred regarding his proposed exhibits. Counsel for the City informed Petitioner that the exhibits were not in acceptable form and that he needed to prepare them in a form that would allow the City to consider and respond to the exhibits. In this regard, counsel for the City explained to Petitioner that the exhibits needed to be both admissible and authenticated. Looking at the first few exhibits, Respondent explained to Petitioner that (1) each document needed to be identified as one exhibit, (2) that the document needed to be complete, not a portion of a document; in other words the documented needed to be a true, correct

and complete copy of the original, (3) pages from multiple documents could not simply be put together as one exhibit, (4) all extraneous information needed to be removed from the exhibits – specifically, all additional information included on the exhibits that was added by Mr. Moring or by his use of AI needed to be removed, and (5) documents created by AI are not evidence. Petitioner indicated that he understood and would promptly revise the exhibits to conform to these requirements.

3. On Tuesday, September 15, 2026, Petitioner provided three PDFs that were his revised exhibits. Rather than marking each exhibit with an exhibit sticker or other reference number, Petitioner "bookmarked" the exhibits.

4. On Thursday, September 17, 2026, the City contacted Petitioner by email and advised him that Respondent had begun its review of his proposed exhibits, but the exhibits did not comply with the discussion that the parties had on Friday, September 11, 2026. The exhibits remain as an array of pages and incomplete documents. Additionally, the City reminded Petitioner of the Court's order to mark each exhibit with an exhibit sticker and number. Respondent advised Petitioner that in the form that the proposed exhibits were provided to the City, the parties could not confer regarding the documents because it was nearly impossible to determine the document in issue and if they were looking at the same document. Making matters further complicated, the PDFs that Petitioner provided utilized a very odd identification system. The first PDF is 76 pages and purports to be 41 exhibits. Each exhibit was assigned a "bookmark" with a label, such as C(a), C(b), C(c), AB(a), AB(b), R(b), E(a), E(b), F(a), F(b), E(c), E(d), E(g), Y(c), Y(d), Y(f), etc. Fundamentally, the proposed exhibits delivered to the City are not comprehensible from an evidentiary standpoint.

5. As such, the City cannot reasonably object to each proposed exhibit that Petitioner bookmarked. Instead, the City generally objects to all of Petitioner's proposed exhibits as follows:

a. These documents are not relevant to the Court's limited jurisdiction in this case. The Court has jurisdiction only to the extent that the City has refused to provide public information to Petitioner under the Texas Public Information Act. Rather than demonstrating that the City has not responded or refused to respond to Petitioner's requests, these documents demonstrate that the City **has** responded to his requests. As such, absent some foundation or other proof to establish that the City has refused to provide records to which Petitioner is entitled, the proposed exhibits are not relevant. *See* Tex. R. Civ. Evid. 401.

b. The documents are not authenticated. They are not true and correct copies of the original documents between Petitioner and the City, and they are not self-authenticating. *See* Tex. R. Civ. Evid. 901 and 902.

c. Some of the documents may not be records from the City and are not authenticated, nor are they self-authenticating. *See* Tex. R. Civ Evid. 901 and 902.

d. The documents constitute hearsay for which there is no exception. The exhibits contain statements made outside of the courtroom hearing and are offered for the truth of the matter asserted. *See* Tex. R. Civ. Evid. 801 and 802.

WHEREFORE, PREMISES CONSIDERED, Respondent, the City of Mount Pleasant, requests that the Court sustain its objections and not admit Petitioner's proposed exhibits.

Respectfully submitted,

DAVIDSON TROILO REAM & GARZA, PC
601 NW Loop 410, Suite 100
San Antonio, Texas 78216
Telephone (210) 349-6484
Facsimile (210) 349-0041

By: ***/s/ Lea A. Ream***
Lea A. Ream
Texas Bar No. 16636750
Email: lream@dtrglaw.com
Austin R. Beck
Texas Bar No. 24095881
Email: abeck@dtrglaw.com

ATTORNEYS FOR RESPONDENT,
CITY OF MOUNT PLEASANT, TEXAS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Respondent's First Amended Answer was served upon the person(s) listed below in the manner(s) listed below on this the 18th day of September, 2026.

Kyle Douglas Moring *Via E-file Notification*
[redacted]

PETITIONER, pro se

[s] Lea A. Ream
Lea A. Ream

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.

Lea Ream on behalf of Lea Ream
Bar No. 16636750
lream@davidsontroilo.com
Envelope ID: 120080966
Filing Code Description: No Fee Documents
Filing Description: No Fee Documents
Status as of 9/18/2026 8:49 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Austin R. Beck		abeck@dtrglaw.com	9/18/2026 7:30:04 AM	SENT
Lea A. Ream	16636750	lream@dtrglaw.com	9/18/2026 7:30:04 AM	SENT
Marla Dial		mdial@dtrglaw.com	9/18/2026 7:30:04 AM	SENT
Kyle DMoring		[redacted]	9/18/2026 7:30:04 AM	SENT