

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT  
ALACHUA COUNTY, FLORIDA  
CIVIL ACTION**

US RIGHT TO KNOW,

Plaintiff,

v.

CASE NO: 01-2017-CA-2426

THE UNIVERSITY OF FLORIDA  
BOARD OF TRUSTEES,

Defendant.

and

DREW KERSHEN,

Intervener.

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**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff, US Right to Know, by and through undersigned counsel and pursuant to Rule 1.350, Florida Rules of Civil Procedure, hereby requests the Defendant The University of Florida Board of Trustees to produce and permit Plaintiff or its agents or attorneys to inspect and copy the following documents in the offices of counsel for Plaintiff at 131 North Gadsden Street, Tallahassee, Florida 32301, within thirty (30) days of service of this request.

**DEFINITIONS**

1. "Dr. Folta" means Kevin M. Folta, Ph.D., an employee of Defendant The University of Florida Board of Trustees.

2. "Outside activity" means outside activity as defined in University of Florida Regulation 1.011(2)(a): "any private practice, private consulting, employment, teaching, research, business (including managerial interests or positions), or other activity, compensated or

uncompensated, which is not part of the employee's assigned duties and for which the University provides no compensation.”

3. The “University” means the University of Florida.

### **REQUESTS**

1. All written employment expectations and responsibilities described in University Regulation 7.010(1)(b), or documents containing this information no matter how titled, provided by the University to Dr. Folta applicable to academic years 2011-12, 2012-13, 2013-14, 2014-15, 2015-16, and 2016-17.

2. All written employment expectations and responsibilities described in University Regulation 7.010(1)(b), or documents containing this information no matter how titled, provided by the University to Dr. Folta specifically pertaining to his responsibilities as interim chair (from 2012 to 2014) and chair (from 2014 to 2017) of the University's horticultural sciences department.

3. The statement of situation described in University Regulation 6.008(2)(a), or documents containing this information no matter how titled, prepared by Dr. Folta for academic years 2011-12, 2012-13, 2013-14, 2014-15, 2015-16, and 2016-17.

4. The statement of annual goals and plan of work described in University Regulation 6.008(2)(b), or documents containing this information no matter how titled, prepared by Dr. Folta for academic years 2011-12, 2012-13, 2013-14, 2014-15, 2015-16, and 2016-17.

5. The annual faculty report of accomplishment statement described in University Regulation 6.008(2)(c), or documents containing this information no matter how titled, prepared by Dr. Folta for academic years 2011-12, 2012-13, 2013-14, 2014-15, 2015-16, and 2016-17.

6. All outside activities reported by Dr. Folta to the University pursuant to University Regulations 1.011 and/or 6.015 applicable to the academic years 2011-12, 2012-13, 2013-14, 2014-15, 2015-16, and 2016-17.

*/s/Lynn C. Hearn*

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**CERTIFICATE OF SERVICE**

Pursuant to Rules 2.516(b)(1) and (f) of the Florida Rules of Judicial Administration, I certify that the foregoing document has been furnished to the following individuals by email via the Florida Courts e-filing Portal this 14<sup>th</sup> day of December, 2017, to:

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