## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA TALLAHASSEE DIVISION

AUGUST DEKKER, et al.,

Plaintiffs,

Case No. 4:22-cv-00325-RH-MAF

v.

JASON WEIDA, et al.,

Defendants.

## PLAINTIFFS' SECOND MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND FOR EXPEDITED BRIEFING AND RULING

Pursuant to Fed. R. Civ. P. 37(a)(3)(b) and N.D. Local Rs. 7.1(L) and 26.1, Plaintiffs move this Court for an order compelling Defendants Jason Weida, in his official capacity as Secretary of the Agency for Health Care Administration (AHCA), and AHCA to produce documents in response to Plaintiffs' Requests for Production, and for an expedited briefing schedule and ruling on this Motion. As grounds, Plaintiffs state:

1. This lawsuit challenges Defendants' adoption of Fla. Admin. Code R. 59G-1.050(7) (the "Challenged Exclusion"), which prohibits Medicaid coverage of medically necessary treatments for gender dysphoria.

- 2. On January 30, 2023, in response to Plaintiffs' Motion to Compel, this Court entered an Order overruling Defendants' claims of attorney-client and work product privileges for certain documents prepared as part of Defendants' formal adoption of the Challenged Exclusion, which it modified on January 31, 2023. (Dkt. Nos. 86, 89). Specifically, the Court found that Defendants were required to produce those documents Defendants created and relied on prior to August 21, 2022 as part of the rule adoption process. (Dkt. No. 89, at 4 ¶3).
- 3. After the Court entered its Order, counsel for Defendants have, for the most part, responded diligently and timely to Plaintiffs' requests. However, the Parties have reached an impasse regarding Defendants' obligation to produce two specific sets of documents: (1) a 17-page memo created on or around July 19, 2022 summarizing AHCA's analysis of and response to public comments receiving during the rule comment period (hereinafter, "17-page memo"), and any drafts thereof, and (2) draft scripts of the July 8th, 2022 public hearing for the Challenged Exclusion (hereinafter, "July 8th script drafts") and e-mail communications between AHCA employees regarding the July 8th script drafts. The July 8th script drafts themselves

<sup>&</sup>lt;sup>1</sup> See also Ex. A which is an email dated July 19, 2022 from Secretary Weida to Defendants' consultants stating that "you will each be overnighted a binder that contain a handful of the substantive comments (e.g., Yale, APP, Endocrine Society) that will be appended to a 17-page document summarizing the Agency's responses/positions with respect to the points raised in those substantive [public] comments.").

contains track-change edits and comments made by AHCA staff, including AHCA counsel.

- 4. Plaintiffs' counsel has conferred with Defendants' counsel regarding Plaintiffs' entitlement to these documents. (*See* Exs. C, D). On February 28, 2023, Defendants responded with their position that the 17-page memo is covered by attorney-client and work-product privilege because Defendant is not required, under Chapter 120, Fla. Stat., to respond to public comments during the rule-making process and, additionally, the document was "created at the direction of counsel, under the threat of litigation." (*See* Ex. B). Counsel for Defendants suggested that, to resolve the Parties' disagreement, the 17-page memo be submitted "for in camera review in order to get additional guidance [from the Court]."
- 5. As set forth in the Memorandum of Law below, Plaintiffs' position is that, based on the Court's previous ruling, this document is not shielded by privilege because it was created as part of Defendants' rulemaking process, *i.e.*, the process undertaken to adopt the Challenged Exclusion, and not for the purpose of giving legal advice or to assist future Defendants in litigation. Moreover, the 17-page memo, by Defendants' *own words*, concerns AHCA's views on the controlling question in this case, i.e., AHCA's views on the evidence base for gender-affirming care. Indeed, Defendant Weida described the document as "summarizing the

Agency's responses/positions with respect to the points raised in" "a handful of the substantive comments (e.g., Yale, APP, Endocrine Society)." (See Ex. A).

- 6. With respect to the second set of documents at issue the July 8th script drafts and related AHCA employee email communications Defendants initially only claimed work product privilege to withhold these documents. (*See* Ex. D.) They now state that they intend to amend their privilege log and assert that the documents are also subject to the attorney-client privilege. (*See* Ex. B). As is the case for the 17-page memo, Plaintiffs contend that this document is not afforded privileged status simply because it includes comments made by an agency attorney, particularly because the comments were made in the development of agency policy and not for the primary purpose of providing legal advice.
- 7. Due, in part, to Defendants' past delays in responding to discovery, the Parties jointly sought, and the Court granted, an Order to Extend Discovery and 26(a)(2) Deadlines, which extended the fact discovery deadline to March 10, 2023. (Dkt. No. 107).
- 8. In line with that deadline, Plaintiffs have scheduled a final re-convening of their Rule 30(b)(6) deposition for March 8, 2023. Plaintiffs will, once again, be prejudiced in preparation for this Rule 30(b)(6) deposition because Defendants have, once again, delayed Plaintiffs ability to review documents pertinent to a controlling issue in this case: whether the process Defendants used and the conclusion they drew

in adopting the Challenged Exclusion was reasonable. *See Rush v. Parham*, 625 F.2d 1150 (5th Cir. 1980); *KG ex rel. Garrido v. Dudek*, 864 F. Supp. 2d 1314, 1321 (S.D. Fla. 2012).

9. Plaintiffs therefore seek an expedited briefing schedule and ruling from the Court.

WHEREFORE, Plaintiffs Request that the Court grant their motion to compel the production of documents, impose an expedited briefing schedule, and issue a ruling in an expedited manner.

#### MEMORANDUM OF LAW

## I. LEGAL STANDARD GOVERNING DISCOVERY OBLIGATIONS UNDER RULE 26.

Rule 26 entitles Plaintiffs to reasonable discovery of materials and evidence relevant to the issues raised in their Complaint. *See* Fed. R. Civ. P. 26(b)(1) (2015); *see GHMC Holding Co., Inc. v. Sickle*, No. 3:14cv614, 2016 WL 7757522, at \*2 (N.D. Fla. Feb. 23, 2016). As a general matter, the purpose of discovery under the Federal Rules of Civil Procedure "is to require the disclosure of all relevant information so that the ultimate resolution of disputed issues in any civil action may be based on a full and accurate understanding of the true facts, and therefore[,] embody a fair and just result." *Pitts v. Francis*, No. 5:07cv169, 2008 WL 2229524, at \*1 (N.D. Fla. May 28, 2008). Indeed, discovery is intended to allow each party to obtain information to best prepare for their respective cases. *DeepGulf, Inc. v.* 

Moszkowski, 330 F.R.D. 600, 605 (N.D. Fla. 2019). The information sought "need not be admissible in evidence" to be discoverable. See Fed. R. Civ. P. 26(b)(1); Oppenheimer Fund, Inc. v. Sanders, 437 U.S. 340, 351-52 (1978). Taken together, Rules 26(g)(1)(A) and 34(1)(1), "place a burden on a party and the party's counsel to ensure that a reasonable and complete search is conducted and that all responsive material is either produced or withheld under a proper objection." Waddell v. HW3 Inv. Grp., LLC, No. 5:21cv55, 2021 WL 9781801, at \*2 (N.D. Fla. Dec. 23, 2021) (internal citation and quotations marks omitted) (emphasis added). Motions to compel discovery brought pursuant to Rule 37 are committed to the sound discretion of the trial court. Commercial Union Ins. Co. v. Westrope, 730 F.2d 729, 731 (11th Cir. 1984).

### II. REQUESTS AT ISSUE

Pursuant to Local Rule 26.1(d), Plaintiffs set forth their Requests for Production that the requested documents fall under as well as Defendants' responses to Plaintiffs' Requests. The relevant row numbers for Defendants' amended privilege log are additionally cited in footnote 2, *infra*.

## Plaintiffs' Requests Nos.

**13:** All Communications between Defendants and any Person who participated in promulgating the GAPMS Memo by advising Defendants, conducting research, or drafting, editing, or reviewing the GAPMS Memo.

**17:** All Documents relating to Defendants' contacting or consulting any Person for guidance, recommendations, or assessments relevant to the development of the Challenged Exclusion.

**25:** All Documents reflecting policies, procedures, or practices related to the implementation, application, or enforcement of the Challenged Exclusion.

**26:** All Communications relating to the implementation, enforcement, and/or impact of the Challenged Exclusion.

**41:** All Documents related to the planning, coordination, and content of the July 8th Hearing.

## Defendants' Response to Request Nos. 13, 17, 25, 26, 41:<sup>2</sup>

Defendants object to this request. The requested documents may be subject to the attorney-client privilege, the work product doctrine, and prohibitions on disclosing healthcare information. The time period of the request, between January 1, 2015 to present, is overly broad, in that Rule 59G-1.050(7) was promulgated in 2022.

Defendants will produce all non-privileged responsive documents on January 6, 2023. The time period of these documents is between January 1, 2022 to present.

## III. NEITHER SET OF DOCUMENTS IS SUBJECT TO ATTORNEY-CLIENT OR WORK PRODUCT PRIVILEGES.

## A. The documents are not entitled to attorney-client privilege.

The attorney-client privilege exists to protect confidential communications between client and lawyer made for the purpose of securing legal advice. *In re Grand Jury Matter No. 91-01386*, 969 F.2d 995, 997 (11th Cir. 1992). To claim

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<sup>&</sup>lt;sup>2</sup> Defendants' asserted privileges for the 17-page memo can be found at Ex. D, Row 143. Additionally, Defendants' asserted privileges for the draft July 8th script and corresponding email communications can be found at Ex. D, Rows 98-107, 112-125.

attorney-client privilege, the proponent of the privilege must prove that what is sought to be protected is (1) a communication (2) made between privileged persons (3) in confidence (4) for the purpose of obtaining or providing legal assistance for the client. *Diamond Resorts U.S. Collection Dev., LLC v. US Consumer Att'ys, P.A.,* 519 F. Supp. 3d 1184, 1197 (S.D. Fla. 2021). No privilege attaches to a communication made in the presence of a third party unless the agency exception applies. *Id.* at 1198-99. For the agency exception to apply, "the third party's involvement must be reasonably necessary for the effective representation of the client." *Id.* at 1199 (internal quotations and citations omitted).

Defendants cite attorney-client privilege with respect to both the 17-page memo as well as the July 8th script drafts and related e-mail communications. But no such privilege is attached to either set of documents.

First, the 17-page memo contains summaries and analysis made by Defendants about substantive public comments from medical organizations collected during the adoption process of the Challenged Exclusion. Under Florida law, Defendants were required to collect and consider public comment prior to adopting the Challenged Exclusion as a final rule. See Fla. Stat. 120.54(c)(1) ("any

<sup>&</sup>lt;sup>3</sup> Defendants suggest in their email to Plaintiffs asserting attorney-client privilege for the 17-page memo that there is no obligation for state agencies to consider public comment under Florida's Administrative Procedures Act. This is not only contrary to the Florida statutory language but would also render the submission of public comment as part of state rule adoption meaningless.

material pertinent to the issues under consideration submitted to the agency within 21 days after the date of the public of notice or submitted to the agency between the date of publication...and the final public hearing *shall be considered by the agency* and made a part of the record....").

Here, Defendants wrote a substantive response to comments submitted by medical organizations—organizations from whom Defendants have sought discovery surrounding the underlying rationales for their positions. See, e.g., Order, In re subpoenas served on American Academy of Pediatrics, et al., Case No. 23-MC-00004 (CJN) (D.D.C. Feb. 28, 2023) (ECF No. 26). Not only is the memo "part of the record" in this rulemaking by Florida law, but it is an undoubtedly relevant document that sets forth Defendants' views on the scientific and medical basis supporting the provision and coverage of gender-affirming medical care. In other words, it is the clearest contemporaneous representation of Defendants' views of the substantive rationale for the Challenged Exclusion beyond the publicly released GAPMS memo. There is no indication the 17-page memo contains any legal advice, which in any event could be redacted. Nor have Defendants represented that it does. So, it simply is not protected by attorney-client privilege. What is more, Defendants mailed the 17-page memo to its outside consultants, whom Defendants retained to draft the GAPMS report and to participate in the July 8th public hearing on the Challenged Exclusion. (See Ex. A).

The attorney-client privilege protects confidential communications related to the provision of legal advice; it does not protect communications between agency counsel and employees when counsel is participating in the ordinary business of the agency. See Andritz Sprout-Bauer, Inc. v. Beazer E., Inc., 174 F.R.D. 609, 633 (M.D. Pa. 1997) ("Only communications made for the express purpose of obtaining or giving legal advice are protected."); see also In re Int'l Oil Trading Co., LLC, 548 B.R. 825, 834 (Bankr. S.D. Fla. 2016). In-house legal counsel often "participates in and renders decisions about business, technical, scientific, public relations, and advertising issues, as well as purely legal issues," and such advice is not cloaked in privilege merely because it is given by an attorney. In re Vioxx Prod. Liab. Litig., 501 F. Supp. 2d 789, 797 (E.D. La. 2007); see also U.S. ex rel. Baklid-Kunz v. Halifax Hosp. Med. Ctr., No. 6:09-CV-1002-ORL-31, 2012 WL 5415108, at \*3 (M.D. Fla. Nov. 6, 2012) ("simply funneling non-privileged information through an attorney does not automatically encase the document in the privilege"). Defendants cannot avoid disclosure of a document they created in the course of performing their obligations under Chapter 120 of the Florida Statutes simply because Defendants decided to involve an attorney in the document's creation. See Motley v. Marathon Oil Co., 71 F.3d 1547, 1550–51 (10th Cir. 1995) ("the mere fact that an attorney was involved in a communication does not automatically render the communication subject to the attorney-client privilege").

Defendants' argument that these documents are shrouded in privilege merely because an attorney was consulted in their creation "goes way too far." *See In re Seroquel Prod. Liab. Litig.*, No. 606MD1769-ORL-22DAB, 2008 WL 1995058, at \*7 (M.D. Fla. May 7, 2008). Agency action often "carries the potential for running afoul of some law or regulation or giving rise to a civil action," but such consultations do "not make the everyday business activities legally privileged from discovery." *See id.* Defendants have not met their burden of showing that the attorneys' involvement in the documents and communications at issue was more than "simply grammatical, editorial, technological, scientific, public relations, or marketing suggestions, and are specifically in the nature of legal advice." *See id.* (*See also* Ex. B.)

Furthermore, the fact that Defendants provided the 17-page memo to third parties, namely the outside consultants Defendants paid to assist with adoption of the Challenged Exclusion (*see* Ex. A), waives any attorney-client privilege that Defendants may have been able to assert. *Diamond Resorts U.S. Collection Dev.*, 519 F. Supp. 3d at 1198-99; *see also In re Seroquel Prod. Liab. Litig.*, 2008 WL 1995058, at \*3 ("Documents prepared for dissemination to third parties are not protected from discovery by either the attorney-client or the work product privilege.").

Second, Defendants have not asserted why any of the comments contained as part of the July 8th script drafts – which were written, in part, by counsel for AHCA - were intended "for the express purpose of obtaining or giving legal advice." See Andritz Sprout-Bauer, Inc., 174 F.R.D. at 633. Given that these drafts were presumably used as an outline for the substance of what AHCA employees and its consultants would say during the July 8th public hearing about the Challenged Exclusion, it is difficult to envision in what capacity legal advice was necessary. Instead, the comments contained on the July 8th script drafts (and the e-mail communications surrounding them) should be considered part of the Defendants' standard course of operations in organizing a public hearing in furtherance of adopting an agency rule. See Andritz Sprout-Bauer, 174 F.R.D. at 633; In re Seroquel Prod. Liab. Litig., 2008 WL 1995058, at \*7 ("Routine inclusion of attorneys in the corporate effort of creating marketing and scientific documents does not support the inference that the underlying communications were created and transmitted primarily to obtain legal advice as is required to justify a privilege.").

## B. The documents are not entitled to the work product privilege.

The work product privilege only applies if the "primary motivating purpose behind the creation of the document was to aid in possible future litigation." (Dkt. No. 89 (citing *United States v. Davis*, 636 F.2d 1028 (5th Cir. 1981))). It is not enough that future litigation was "certainly possible," that the document "may also

be helpful in the event of litigation," or that it was prepared "with an eye toward litigation." Wyndham Vacation Ownership, Inc. v. Reed Hein & Assocs., LLC, No. 6:18cv2171, 2019 WL 9091666, at \*14-15 (M.D. Fla. Dec. 9, 2019). Here, Defendants bear the burden of establishing protection by a preponderance of the evidence, and they must "provide the Court with underlying facts demonstrating the existence of the privilege." Diamond Resorts, 519 F. Supp. 3d at 1200. In this case, rule promulgation is ordinary agency business, and documents prepared in the ordinary course of business or other non-litigation purposes are not protected as work product. See U.S. Fid. & Guar. Co. v. Liberty Surplus Ins. Corp., 630 F. Supp. 2d 1332, 1336 (M.D. Fla. 2007); see also Dkt. No. 89, at 2-3.

The fact that "an agency document was written by a lawyer does not necessarily make it 'work product.'" *Kent Corp. v. N.L.R.B.*, 530 F.2d 612, 623 (5th Cir. 1976). The work product privilege does not extend to attorneys acting in primarily political or policy roles on behalf of a government agency. *Texas v. United States*, 279 F.R.D. 24, 33 (D.D.C. 2012) ("Texas has failed to show that [its attorneys] were acting in a primarily legal role as map-drawers instead of in political or policy roles, as to which no work-product doctrine would apply in any event.").

First, regarding the 17-page memo, by Defendants' own admission the document was created not by counsel, but at most at counsel's direction. The document was created to "summarize[] AHCA's responses to comments received

during the rulemaking process," (Ex. B), prior to the finalization of the rule at issue. Indeed, it was shared with Defendants' outside consultants to assist in advising Defendants about the final development and adoption of the Challenged Exclusion. (See Ex. A). And the Court already found that "[t]he experts provided opinions ostensibly relied on as a basis for the rule that was later adopted and that the plaintiffs now challenge." (Dkt. No. 89, at 1-2). As a result, the Court already held and ordered in the clearest of terms that: "The defendants' claim of attorney-client privilege or work-product protection for communications with or documents prepared by or provided to experts prior to August 21, 2022 is overruled; the requested documents must be produced." (Dkt. No. 89, at 4 ¶ 3). Given the Court's Order, Defendants cannot withhold the 17-page memo.

Second, Defendants assert the work-product privilege with respect to communications in drafts of the script for the July 8th, 2022 hearing and the emails exchanging the script drafts (See fn. 2, supra). Like the 17-page memo, Defendants fail to make the proper showing that these communications and documents were made in anticipation of litigation rather than as a part of the rule promulgation

<sup>&</sup>lt;sup>4</sup> In ordering that Defendants produce documents similar to the ones at issue in this Motion, the Court observed "Either the experts were retained to assist in an honest evaluative process—in which event their communications were not within work-product protection—or the rulemaking process was a sham and the real goal was to prevail in the anticipated litigation—a possibility the defendants could embrace to win the discovery battle only by acknowledging that the rulemaking process was fatally flawed, or nearly so." (Dkt. No. 89, at 2-3).

process. See P. & B. Marina, Ltd. P'ship v. Logrande, 136 F.R.D. 50, 58 (E.D.N.Y. 1991), aff'd sub nom. P&B Marina Ltd. v. LoGrande, 983 F.2d 1047 (2d Cir. 1992) (refusing to extend the work product privilege to letters and memoranda related to administrative actions). Thus, as with previous documents created to aid in the adoption of the Challenged Exclusion, Defendants' "claim of attorney-client privilege or work-product protection for ... documents ... provided to experts prior to August 21, 2022," (Dkt. No. 89, at 4 ¶3), were "an essential part of the mandated rulemaking process" and should be overruled. (Id.).

### IV. PLAINTIFFS' MOTION REQUIRES A PROMPT RULING.

Due to Defendants refusal to produce the 17-page memo and the July 8th script drafts (including the AHCA employee email exchanges regarding the July 8th script drafts), Plaintiffs are and will continue to be prejudiced in their ability to complete fact discovery in a timely manner. Due to the impending discovery deadline of March 10, 2023, and the Rule 30(b)(6) deposition scheduled for March 8, 2023, Plaintiffs seek "a ruling more promptly than would occur in the ordinary course of business." *See* N.D. Fla. Local Rule 7.01(L). Though this Motion is not labeled as an "Emergency," Plaintiffs will orally advise the Clerk's office that the motion seeking an expedited briefing schedule and ruling has been filed. *Id*.

#### V. CONCLUSION

Defendants once again assert attorney-client and work product privileges for documents that should have produced in accordance with this Court's January 30, 2023 Order, as modified (Dkt. Nos. 86, 89), and which, for all intents and purposes, Defendants created as part of what *should* have been Defendants' regular course of agency business in formally adopting Medicaid policy. These documents are important to Plaintiffs' case as they provide insight into why Defendants reached the conclusion that adopting the Challenged Exclusion was or was not reasonable. As such, Plaintiffs respectfully request that this Court grant their Motion to Compel and order an expedited briefing and ruling schedule.

### **Certificate of Conferral**

Counsel for Plaintiffs conferred with Defendants counsel during telephone conferences on February 21 and 28, 2023 and March 1, 2023, and through email correspondence on February 16, 27, and 28, 2023 and March 2, 2023, but were unable to resolve the issues addressed in this Motion.

On March 2, 2023, after being notified of Plaintiffs' intent to file the instant motion, Defendants wrote: "If you could wait to file until Monday [March 6, 2023], we would appreciate that. Andrew Sheeran [AHCA General Counsel] will be back in the office then and I'd like to discuss this issue with him in greater detail." Given the existing timeline and deadlines (with the remainder of the Rule 30(b)(6)

deposition scheduled for March 8 and the close of fact discovery scheduled for March 10), and the multiple meets and confers that have already taken place, Plaintiffs' counsel informed Defendants' counsel they could not accommodate the request but would include it in the instant motion.

Dated: March 2, 2023

/s/ Omar Gonzalez-Pagan

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Counsel for Plaintiffs

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of March, 2023, a true copy of the foregoing has been filed with the Court utilizing its CM/ECF system, which will transmit a notice of electronic filing to counsel of record for all parties in this matter registered with the Court for this purpose.

## **CERTIFICATE OF WORD COUNT**

As required by Local Rule 7.1(F), I certify that this Motion contains 3,752 words.

/s/ Omar Gonzalez-Pagan
Counsel for Plaintiffs

# Exhibit A

Re: Yale (Privileged & Confidential)



Wed 7/20/2022 6:53 PM

To: Weida, Jason < Jason. Weida@ahca.myflorida.com>

Cc: Tamayo, Josefina <Josefina.Tamayo@ahca.myflorida.com>;mjazil@holtzmanvogel.com <mjazil@holtzmanvogel.com>;gperko@holtzmanvogel.com <gperko@holtzmanvogel.com>

Hi, I can do Monday at 10am but is this about the Alstott letter? Is it still important that I review it? I'm very pressed for time.

Miriam

Sent from my iPad

On Jul 20, 2022, at 3:30 PM, Weida, Jason < Jason. Weida@ahca.myflorida.com > wrote:

Hi Miriam,

No problem. Would you be available for a quick call at some point the morning of Monday, July 25? We are trying to wrap up and it would be helpful to connect with you on Monday morning, if you can make that work?

Thanks!

Jason

From: miriam grossman <

**Sent:** Tuesday, July 19, 2022 10:53 PM

To: Andre Van Mol <95andrev@gmail.com>; Weida, Jason <Jason.Weida@ahca.myflorida.com>
Cc: Van Meter Quentin <kidendo@comcast.net>; Tamayo, Josefina

<Josefina.Tamayo@ahca.myflorida.com>; mjazil@holtzmanvogel.com; gperko@holtzmanvogel.com
Subject: Re: Yale (Privileged & Confidential)

Jason,

I can't get to any of this until next week, sorry.



Miriam Grossman MD Board-Certified in Child, Adolescent and Adult Psychiatry

This message and any included attachments are intended only for the addressee. The information contained in this message is confidential GROSSMAN0067

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and may constitute proprietary or non-public information under international, federal, or state laws. Unauthorized forwarding, printing, copying, distribution, or use of such information is strictly prohibited and may be unlawful. If you are not the addressee, please promptly delete this message and notify the sender of the delivery error by e-mail.

From: Andre Van Mol < 95andrev@gmail.com >

Sent: Tuesday, July 19, 2022 9:51 PM

To: Weida, Jason < <u>Jason.Weida@ahca.myflorida.com</u>>

**Cc:** Van Meter Quentin < <u>kidendo@comcast.net</u>>; miriam grossman

>; Tamayo, Josefina < <u>Josefina.Tamayo@ahca.myflorida.com</u>>;

<u>mjazil@holtzmanvogel.com</u> < <u>mjazil@holtzmanvogel.com</u> >; <u>gperko@holtzmanvogel.com</u>

<gperko@holtzmanvogel.com>

**Subject:** Re: Yale (Privileged & Confidential)

By the way, Friday at 7 or 8 AM Pacific time start time would work for me.

Andre

Sent from my iPhone

On Jul 19, 2022, at 2:33 PM, Andre Van Mol < 95andrev@gmail.com > wrote:

Hi, Jason and team.

47 pages. Yikes. I'll see what I can do this evening. Quentin may well be on a flight back from Europe in the next day or two. Not sure what Miriam's busy schedule looks like. My oldest gets married this Saturday, so the week is a bit full, and I am on vacation next week. But, I'll do what I can.

Andre

Sent from my iPhone

On Jul 19, 2022, at 12:33 PM, Weida, Jason <<u>Jason.Weida@ahca.myflorida.com</u>> wrote:

PRIVILEGED & CONFIDENTIAL
ATTORNEY WORK PRODUCT PROTECTED

Andre, Quentin, and Miriam,

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Please see the attached report from Yale. You may or may not have seen this one already. Would you be able to review it and give me your preliminary thoughts? Happy to set up a call if that's what you prefer. If I could get some high-level comments on Yale's report by 2:00 PM Eastern tomorrow I would be very grateful.

In addition, you will each be overnighted a binder that contain a handful of the substantive comments (e.g., Yale, APP, Endocrine Society) that will be appended to a 17-page document summarizing the Agency's responses/positions with respect to the points raised in those substantive comments. Please review those materials as well so we can discuss as soon as you are able this week.

Thanks, Jason

## Jason C. Weida

Assistant Deputy Secretary for Medicaid Policy & Quality

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Jason.Weida@ahca.myflorida.com

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<Alstott et al FULL comment proposed rule re gender dysphoria ACCESSIBLE.pdf>

# Exhibit B

From: Michael Beato <mbeato@HoltzmanVogel.com>

Sent: Tuesday, February 28, 2023 4:19 PM

**To:** Omar Gonzalez-Pagan; chelsea.dunn@southernlegal.org; Little, Joe; Simone Chriss

Cc: John Cycon; Mohammad O. Jazil; Gary V. Perko; Zack Bennington

**Subject:** Dekker v. Weida: Follow Up on Two Documents

#### Counsel,

Following your February 27, 2023 email, and our meet and confer this morning, we agreed to provide you with our written position regarding two matters: (1) a 17-page document that was sent from AHCA to its experts; and (2) the communications and draft transcripts of the July 8, 2022 hearing.

With respect to the 17-page document, we first note that the document was included on our privilege log. (AHCA Priv. Log Row 143). The document was created around July 19, 2022. It summarizes AHCA's responses to comments received during the rulemaking process. While the federal Administrative Procedure Act requires federal agencies to respond to public comments during the rulemaking process, see 5 U.S.C. § 553(c) ("After consideration of the relevant matter presented, the agency shall incorporate in the rules adopted a concise general statement of their basis and purpose." (emphasis added)); see also Perez v. Mortg. Bankers Ass'n, 575 U.S. 92, 97 (2015) ("An agency must consider and respond to significant comments received during the period for public comment."), we note that the Florida Administrative Procedure Act does not require this for state agencies, see ch. 120, Fla. Stat.

We further note that the document was created *after* the July 8, 2022 hearing, where several members of the public, including opposing counsel, threatened to sue AHCA if it promulgated the at-issue rule. *See, e.g.*, Defendants' Response in Opposition to Preliminary Injunction Motion Appendix 285-86 (Transcript of the July 8 Hearing) ("And this litigation that the state will certainly find itself embroiled in is wasting valuable state resources that could be better utilized enhancing the lives of Floridians rather than attacking them." (Simone Chriss)); App. 317 (stating that the challenged rule violates the Affordable Care Act and U.S. Constitution (Carl Charles)).

We can represent to you the that 17-page document was created at the direction of counsel, under the threat of litigation. AHCA believed that a written, internal response to the public comments would assist in future litigation.

While we understand that Judge Hinkle stated that, for work-product purposes, litigation was imminent at the end of August 2022, we believe that these additional facts weigh in favor of not produce this document. Since the Parties disagree, we believe that it would make sense for us to submit the document for *in camera* review in order to get additional guidance. We welcome your thoughts though. We will also be discussing this issue further with our client to see whether the need to protect similar documents in future rulemakings outweighs the benefits of producing it here.

With respect to the communications and July 8 script drafts, as we have stated during our meet and confers, AHCA staff, including attorneys, provided comments and edits on the July 8 hearing script. It is difficult to redact or separate edits and comments, many of which were provided by attorneys. While our privilege log states that these communications and drafts are protected by the work-product privilege, we can amend our privilege log and state that these are attorney-client protected documents. We believe that these documents are protected by the attorney-client privilege because AHCA attorneys provided edits and comments on the July 8 draft script. Again, we note that in March 2022, the Biden Department of Justice threatened to sue states that address gender-affirming-care issues. We are happy to discuss this further at your convenience.

Michael Beato

Office: (850) 354-5645

mbeato@HoltzmanVogel.com // www.HoltzmanVogel.com



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#### DISCLAIMER

Any accounting, business or tax advice contained in this communication, including attachments and enclosures, is not intended as a thorough, in-depth analysis of specific issues, nor a substitute for a formal opinion, nor is it sufficient to avoid tax-related penalties. If desired, Holtzman Vogel, PLLC would be pleased to perform the requisite research and provide you with a detailed written analysis. Such an engagement may be the subject of a separate engagement letter that would define the scope and limits of the desired consultation services.

# Exhibit C

**BALANCING THE SCALES SINCE 1977** 

1229 N.W. 12th Avenue ◆ Gainesville, Florida 32601-4113 ◆ PHONE (352) 271-8890 FAX (352) 271-8347 ◆ slc@southernlegal.org ◆ www.southernlegal.org

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Jodi Siegel, Executive Director
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Chelsea Dunn

Daniel Marshall

February 16, 2023

#### Via Email

Mohammad Jazil, mjazil@holtzmanvogel.com Gary Perko, gperko@holtzmanvogel.com Michael Beato, mbeato@holtzmanvogel.com

Re: Privilege Assertions by Defendants

Dekker v. Weida, Case No. 4:22-cv-00325-RH-MAF (N.D. Fla.)

Dear Counsel,

This letter addresses Plaintiff's disagreement with Defendants' assertions of privilege in their Amended Privilege Log served February 2, 2023. Attached with this letter is a re-organized version of the Privilege log in PDF form. Plaintiffs had difficulty matching email correspondence with its attachments in the version served by Defendants, so Plaintiffs resorted the columns to match parent and attachment. The rows identified in this letter reference the attachment.

Plaintiffs believe that, despite the Court's order on the Motion to Compel (ECF 86), Defendants still take an overly broad approach to privilege. Specifically, Plaintiffs take issue with the following:

(1) Claims of Work Product Privilege that pre-date the implementation of Rule 59G-1.050(7) (**Rows 3-13; 22-23; 30-31; 98-107; 112-125, 171**)

Work Product Privilege only applies when if the "primary motivating purpose behind the creation of the document was to aid in possible future litigation." ECF 86 (citing *United States v. Davis*, 636 F.2d 1028 (5th Cir. 1981). Defendant's assertion of this privilege to protect AHCA's analysis of the HHS Notice and Guidance on Gender Affirming Care (Rows 22-23), drafts of the remarks/scripts for the rule hearing (Rows 98-107¹, 112-125), discussions amongst high level employees about the rule revisions (Rows 30-31), and the Adoption Packet for 59G-1.050 (Row 171) is, in our view, misplaced. If, indeed, these communications related to the GAPMS and rule promulgation process and their attachments are work product, it would suggest that the Agency engaged in a sham rulemaking process rather than an honest evaluative process. For similar reasons, we do not believe that the Medicare and Medicaid Decision Memo for Gender Dysphoria circulated amongst attorneys at the General Counsel office months before the Agency decided to undertake the GAPMS would be protected by Work Product privilege as documents whose "primary motivating purpose" was to "aid in possible future litigation."

(2) Documents claiming Attorney Client Privilege without a confidential communication by a client to an attorney (**Rows 30-31, 249-250**)

Defendants claim Attorney Client Privilege to protect communications made between then Assistant Deputy Secretary for Medicaid Weida and AHCA Program Administrator Cole Giering related to the rule revisions (Rows 30-31). Attorney-client privilege applies to confidential communications made between a client and their lawyer for the purposes of securing legal advice. It is unclear how a communication between two high-level employees, with no attorney included, regarding the rule process would qualify as such. AHCA similarly claim Attorney Client Privilege related to communications amongst General Counsel's Office attorneys in response to "Senator Book's AHCA Rule Letter" (Rows 249-250). Defendants do not justify how these communications were related to the giving or receiving of legal advice.

(3) Emails between AHCA General Counsel's Office and EOG General Counsel's Office (Rows 40-43, 46-47, 52-53, 58-59)

Defendants claim both Attorney-Client Privilege and Work Product Privilege as to communications between AHCA General Counsel and the General Counsel for the Executive Office of the Governor (Rows 40-43, 46-47, 52-53, 58-59). It is unclear how these emails and their attachments, all of which pre-date the rule promulgation, would be work product. Plaintiffs also do not understand how Defendants can assert that these communications are protected by Attorney-Client privilege, when there is no indication that they were related to the provision of legal advice to a client.

(4) Documents between General Counsel at DOH (**Rows 127-141, 204, 207-210**)

<sup>&</sup>lt;sup>1</sup> Note that Plaintiffs have explicitly excluded communications from litigation counsel.

Similarly, Defendants claim both Attorney-Client Privilege and Work Product Privilege as to communications between AHCA General Counsel staff attorneys about a "DOH Petition" (Rows 127-141, 204, 207-210). We fail to comprehend how AHCA General Counsel staff emails, comments, and notes related to a DOH petition could be communications made for the purposes of seeking legal advice to its client—AHCA—or in furtherance of any litigation to which AHCA would be a party. Accordingly, we do not believe these communications are protected.

(5) Emails regarding a public event invitation from ADF (211, 251-257)

Lastly, Defendants claim both Attorney-Client Privilege and Work Product Privilege as to communications about a public invitation to speak at an ADF event (211, 251-257). There is clearly no Work Product Privilege at issue here – these communications cannot be claimed to be in furtherance of any litigation. And Defendants also fail to explain how these emails were for the purposes of giving or seeking legal advice.

We look forward to discussing these at our conference scheduled for February 17, 2023, at 1pm, and appreciate defense counsel's continued efforts to work cooperatively through the discovery process.

Sincerely,

/s/ Chelsea Dunn
Chelsea Dunn
Counsel for Plaintiffs

# Exhibit D

## Case 4:22-cv-00325-RH-MAF Document 109-4 Filed 03/02/23 Page 2 of 19

	Α	В	С	D	E	F	G	Н	ı	J
1					Defendant	s' Amended Privilege L	.og			
	Bates	Document	Privilege							
2	Number	Type	Tags	Privilege Note	Sent Date	Subject	From	Recipients	То	CC
3	AHCA0003348	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	1/5/2022 4:28 PM	Sending to you for future reference and to obtain latest version for you.	Bunton, Samuel	""Sheeran"","" Andrew; <andrew.sheeran@a hca.myflorida.com&gt;</andrew.sheeran@a 	""Sheeran"","" Andrew; <andrew.sheeran@ ahca.myflorida.com&gt;</andrew.sheeran@ 	
				Email between AHCA General Counsel staff regarding Medicare and Medicaid		FW: Sending to you for future reference and to obtain latest		""Sheeran"","" Andrew; <andrew.sheeran@a< td=""><td>""Sheeran"","" Andrew;<andrew.sheeran@< td=""><td></td></andrew.sheeran@<></td></andrew.sheeran@a<>	""Sheeran"","" Andrew; <andrew.sheeran@< td=""><td></td></andrew.sheeran@<>	
4	AHCA0003349	Pdf	Work-Product	Decision Memo for Gender Dysphoria.  Attachment to email between AHCA	1/5/2022 4:34 PM	version for you.	Bunton, Samuel	hca.myflorida.com>	ahca.myflorida.com>	
				General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria; Decision						
5	AHCA0003350	Pdf	Work-Product	Summary.						
6	AHCA0003461	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.  Attachment to email between AHCA	1/5/2022 4:34 PM	FW: Sending to you for future reference and to obtain latest version for you.	Bunton, Samuel	""Sheeran"","" Andrew; <andrew.sheeran@a hca.myflorida.com=""></andrew.sheeran@a>	""Sheeran"","" Andrew; <andrew.sheeran@ ahca.myflorida.com=""></andrew.sheeran@>	
7	AHCA0003462	Pdf	Work-Product	General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria; Decision Summary.						
8	AHCA0073790	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	3/21/2022 6:52 PM	Gender Dysphoria Discrimination - The ADA Project	Josie	Josie Tamayo	Josie Tamayo	
9	AHCA0075195	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria and ADA Project.	3/22/2022 12:17 PM	FW: Gender Dysphoria Discrimination - The ADA Project	Tamayo, Josefina	""Sheeran"","" Andrew;" "Kellum"","" Kim;" "Bunton"","" Samuel; <andrew.sheeran@a hca.myflorida.com="">;<kim.kell um@ahca.myflorida.com=""></kim.kell></andrew.sheeran@a>	""Sheeran"", "" Andrew," "Kellum"", "" Kim;" "Bunton"", "" Samuel; <andrew-sheeran@ ahca.myflorida.com="">;<kim.k ellum@ahca.myflorida.com=""></kim.k></andrew-sheeran@>	
10	AHCA0075196	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	3/22/2022 3:15 PM	FW: Gender Dysphoria Discrimination - The ADA Project	Bunton, Samuel	""Sheeran"","" Andrew; <andrew.sheeran@a hca.myflorida.com=""></andrew.sheeran@a>	""Sheeran"","" Andrew; <andrew.sheeran@ ahca.myflorida.com=""></andrew.sheeran@>	
11	AHCA0076567	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	3/25/2022 7:12 AM	FW: Claire v. Florida Department of Management Services, 504 F.Supp.3d 1328, N.D. Florida	Bunton, Samuel	""Sheeran"","" Andrew; <andrew.sheeran@a hca.myflorida.com=""></andrew.sheeran@a>	""Sheeran"","" Andrew; <andrew.sheeran@ ahca.myflorida.com=""></andrew.sheeran@>	
12	AHCA0076568	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.						
13	AHCA0076576	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.						
14	AHCA0076584	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similiar case.	3/25/2022 7:14 AM	FW: Claire v. Florida Department of Management Services, 504 F.Supp.3d 1328, N.D. Florida	Bunton, Samuel	""Templeton"","" Mary Gay; <marygay.templeton@a hca.myflorida.com&gt;</marygay.templeton@a 	""Templeton"","" Mary Gay; <marygay.templeton@ ahca.myflorida.com&gt;</marygay.templeton@ 	
15	AHCA0076585	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.						
16	AHCA0076593	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.				WTanalate W W Me-	WT amplete: W W A4-	
17	AHCA0076601	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case. Email between AHCA General Counsel	3/25/2022 8:20 AM	Cases of interest	Bunton, Samuel	""Templeton"","" Mary Gay; <marygay.templeton@a hca.myflorida.com&gt;</marygay.templeton@a 	""Templeton"","" Mary Gay; <marygay.templeton@ ahca.myflorida.com&gt;</marygay.templeton@ 	
18	AHCA0076602	Pdf	Work-Product	staff regarding similar case.						
10	AHCA0076607	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.						
18				Email between AHCA General Counsel						
20	AHCA0076618	Pdf	Work-Product	staff regarding similar case.  Email between AHCA General Counsel staff and outside counsel concerning				Andy Bardos - 2825 (Andy Bardos@gray-	Andy Bardos - 2825	
21	AHCA0077010	Pdf	Attorney- Client;Work-Product	HHS notice and guidance concerning gender-affirming care.	3/25/2022 11:21 AM	US v Fl Confidential	Tamayo, Josefina	robinson.com);Sheeran, Andrew	(Andy.Bardos@gray- robinson.com)	Sheeran, Andrew

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	А	В	С	D	Е	F	G	Н	I	J
				Attachment to Email between AHCA						
				General Counsel staff regarding similar case; HHS Notice and Guidance on						
				gender Affirming Care, Civil Rights, and						
22	AHCA0077011	Pdf	Work-Product	Patient Privacy.						
				Email between AHCA General Counsel				""Kellum"",""	""Kellum"",""	
1	****	5.11		staff regarding relevant statutory				Kim; <kim.kellum@ahca.myflo< td=""><td></td><td></td></kim.kellum@ahca.myflo<>		
23	AHCA0084244	Pdf	Work-Product	provisions. Email between AHCA General Counsel	4/4/2022 4:20 PM		Templeton, Mary Gay	rida.com>	orida.com>	
24	AHCA0084245	Pdf	Work-Product	staff regarding similar case.						
				Email between AHCA General Counsel				""Sheeran"",""	""Sheeran"",""	
				and outside counsel concerning				Andrew; <andrew.sheeran@ah< td=""><td></td><td></td></andrew.sheeran@ah<>		
25	AHCA0087361	Pdf	Work-Product	information on potential experts.	4/18/2022 11:11 AM	FW: Conference with Dr. Cantor	Ashley Hoffman Lukis	ca.myflorida.com>	hca.myflorida.com>	
				Email between AHCA General Counsel						
				and outside counsel concerning						
26	AHCA0087362	Pdf	Work-Product	information on potential experts.						
								""Weida"",""		
				Email from AHCA Program				Jason; <jason.weida@ahca.m< td=""><td></td><td></td></jason.weida@ahca.m<>		
				Administrator to Assistant Deputy Secretary for Medicaid, AHCA Chief of				yflorida.com>;Farrill, Cody;Sheeran,		Farrill, Cody;Sheeran,
				Staff, AHCA Bureau Chief, and Office of				Andrew;Dalton,		Andrew;Dalton,
				General Counsel re: revised rule, notice				Ann;Grantham,	""Weida"",""	Ann;Grantham,
			Attorney-	of rule development, and finalizing				Shena;Tamayo,	Jason; <jason.weida@ahca.< td=""><td>Shena;Tamayo,</td></jason.weida@ahca.<>	Shena;Tamayo,
27	AHCA0141306	Pdf	Client;Work-Product		6/1/2022 1:09 PM	RE: Discussion [Privileged]	Giering, Cole	Josefina;Kellum, Kim	myflorida.com>	Josefina;Kellum, Kim
				Attachment to email from AHCA Program Administrator to Assistant						
				Deputy Secretary for Medicaid, AHCA						
				Chief of Staff, AHCA Bureau Chief, and						
				Office of General Counsel re: revised						
				rule, notice of rule development, and						
			Attorney-	finalizing recommendation regarding the						
28	AHCA0141308	Pdf	Client;Work-Product	rule. Attachment to email from AHCA						
				Program Administrator to Assistant						
				Deputy Secretary for Medicaid, AHCA						
				Chief of Staff, AHCA Bureau Chief, and						
				Office of General Counsel re: revised						
				rule, notice of rule development, and						
29	AHCA0141309	Pdf	Attorney- Client;Work-Product	finalizing recommendation regarding the rule.						
29	AHCA0141309	Fui	Ciletit, WOIK-FTOGUCI	Email from AHCA Program						
				Administrator to Assistant Deputy						
				Secretary for Medicaid re: revisions to				""Weida"",""	""Weida"",""	
			Attorney-	rule as part of broader legal and policy				Jason; <jason.weida@ahca.m< td=""><td></td><td></td></jason.weida@ahca.m<>		
30	AHCA0141315	Pdf	Client;Work-Product	review.  Attachment to email from AHCA	6/1/2022 3:15 PM	RE: Discussion [Privileged]	Giering, Cole	yflorida.com>	myflorida.com>	
				Program Administrator to Assistant						
			Attorney-	Deputy Secretary for Medicaid re:						
31	AHCA0141317	Pdf	Client;Work-Product	revisions to rule.						
								""Kellum"","" Kim;"	""Kellum"","" Kim;"	
								"Grantham"","" Shena;"	"Grantham"","" Shena;"	
								"Sheeran"","" Andrew; <andrew.sheeran@a< td=""><td>"Sheeran"","" Andrew;<andrew.sheeran@< td=""><td></td></andrew.sheeran@<></td></andrew.sheeran@a<>	"Sheeran"","" Andrew; <andrew.sheeran@< td=""><td></td></andrew.sheeran@<>	
				Email exchange between counsel in				hca.myflorida.com>; <kim.kell< td=""><td>ahca.mvflorida.com&gt;:<kim.k< td=""><td></td></kim.k<></td></kim.kell<>	ahca.mvflorida.com>: <kim.k< td=""><td></td></kim.k<>	
1 1				AHCA General Counsel's Office re: legal				um@ahca.myflorida.com>; <s< td=""><td>ellum@ahca.myflorida.com&gt;;</td><td></td></s<>	ellum@ahca.myflorida.com>;	
				analysis and review of public records				hena.Grantham@ahca.myflori	<shena.grantham@ahca.my< td=""><td></td></shena.grantham@ahca.my<>	
32	AHCA0144360	Pdf	Attorney-Client	request responses.	6/3/2022 8:24 AM	FW: Public Records Daily Log	George, Tracy	da.com>;Shoop,	florida.com>	Shoop,
				Email exchange between counsel in AHCA General Counsel's Office re: legal				""George"",""	""George"",""	
				analysis and review of public records				Tracy; <tracy.george@ahca.< td=""><td>Tracy;<tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<></td></tracy.george@ahca.<>	Tracy; <tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<>	
33	AHCA0144377	Pdf	Attorney-Client	request responses.	6/3/2022 8:35 AM	RE: Public Records Daily Log	Shoop, Richard	myflorida.com>	myflorida.com>	
Ħ	-		,	· '		,		""George"","" Tracy;" "Kellum"","" Kim;"	""George"","" Tracy;" "Kellum"","" Kim;"	
				Email exchange between counsel in				"Grantham"",""	"Grantham"",""	
				AHCA General Counsel's Office re: legal analysis and review of public records		RE: Public Records Daily Log [ATTORNEY WORK PRODUCT		Shena; <kim.kellum@ahca.my< td=""><td></td><td></td></kim.kellum@ahca.my<>		
34	AHCA0144384	Pdf	Attorney-Client	request responses.	6/3/2022 8:42 AM	PRIVILEGED AND EXEMPT	Sheeran, Andrew	florida.com>; <tracy.george@ ahca.myflorida.com&gt;</tracy.george@ 	myflorida.com>; <tracy.geor ge@ahca.myflorida.com&gt;</tracy.geor 	
34	/ 11 IOAU 144304	i ui	Autorney-Orient	Email exchange between counsel in	0/0/2022 0.42 AW	THIVILLOED AND EXEMPT	Griecian, Andrew	anca.mynonua.com/	go@anoa.mynonua.com/	
				AHCA General Counsel's Office re: legal		RE: Public Records Daily Log		""Sheeran"",""	""Sheeran"",""	
			Attorney-	analysis and review of public records		[ATTORNEY WORK PRODUCT	_	Andrew; <andrew.sheeran@a< td=""><td>Andrew;<andrew.sheeran@< td=""><td></td></andrew.sheeran@<></td></andrew.sheeran@a<>	Andrew; <andrew.sheeran@< td=""><td></td></andrew.sheeran@<>	
35	AHCA0144404	Pdf	Client;Work-Product	request responses.	6/3/2022 9:28 AM	PRIVILEGED AND EXEMPT]	George, Tracy	hca.myflorida.com>	ahca.myflorida.com>	

## Case 4:22-cv-00325-RH-MAF Document 109-4 Filed 03/02/23 Page 4 of 19

П	Α	В	С	D	E	F	G	Н	ı	J
								""Dalton"","" Ann;"	""Dalton"","" Ann;" "Sheeran"","" Andrew;"	
				Email from AHCA Administrator to				"Sheeran"","" Andrew;"	"Kellum"",""	
				AHCA General Counsel's Office; AHCA				"Kellum"",""	Kim; <ann.dalton@ahca.myfl< td=""><td></td></ann.dalton@ahca.myfl<>	
				Bureau Chief, Assistant Deputy				Kim; <ann.dalton@ahca.myflo< td=""><td>orida.com&gt;;<andrew.sheera< td=""><td></td></andrew.sheera<></td></ann.dalton@ahca.myflo<>	orida.com>; <andrew.sheera< td=""><td></td></andrew.sheera<>	
				Secretary for Medicaid, and AHCA Senior Pharmacist re: legal analysis of		Follow Up from Friday Gender		rida.com>; <andrew.sheeran @ahca.myflorida.com&gt;;<kim.< td=""><td>n@ahca.myflorida.com&gt;;<ki m.Kellum@ahca.myflorida.co</ki </td><td></td></kim.<></andrew.sheeran 	n@ahca.myflorida.com>; <ki m.Kellum@ahca.myflorida.co</ki 	
36	AHCA0151614	Pdf	Attorney-Client	governing statutory provision.	6/6/2022 11:35 AM	Dysphoria Meeting	Peterson, Ashley	Kellum@ahca.myflorida.com>	m>	
				Attachment to email from AHCA Administrator to AHCA General						
				Counsel's Office; AHCA Bureau Chief,						
				Assistant Deputy Secretary for Medicaid,						
37	AHCA0151615	Pdf	Attornay Client	and AHCA Senior Pharmacist re: legal						
3/	AHCAUISIBIS	Pui	Attorney-Client	analysis of governing statutory provision.						
				Attachment to email from AHCA						
				Administrator to AHCA General						
				Counsel's Office; AHCA Bureau Chief, Assistant Deputy Secretary for Medicaid,						
				and AHCA Senior Pharmacist re: legal						
38	AHCA0151617	Pdf	Attorney-Client	analysis of governing statutory provision.		5W B 1 " B				
			1	Email from AHCA General Counsel's Office to Public Records Office re: public		FW: Public Records Request   GAPMS Memo & Related		""Gavins"","" Alexandra; <alexandra.gavins< td=""><td>""Gavins"","" Alexandra;<alexandra.gavin< td=""><td></td></alexandra.gavin<></td></alexandra.gavins<>	""Gavins"","" Alexandra; <alexandra.gavin< td=""><td></td></alexandra.gavin<>	
39	AHCA0159399	Pdf	Attorney-Client	records request response.	6/9/2022 3:48 PM	Documents	George, Tracy	@ahca.myflorida.com>	s@ahca.myflorida.com>	
									-	
				Email from AHCA Assistant Deputy Secretary for Medicaid to EOG's General				""Furino"",""	""Furino"",""	
			Attorney-	Counsel's Office re: discussion of				Maureen; <maureen.furino@e< td=""><td>Maureen;<maureen.furino@< td=""><td></td></maureen.furino@<></td></maureen.furino@e<>	Maureen; <maureen.furino@< td=""><td></td></maureen.furino@<>	
40	AHCA0159580	Pdf	Client;Work-Product		6/10/2022 3:47 PM	Privileged & Confidential	Weida, Jason	og.myflorida.com>	eog.myflorida.com>	
				Attachment to email from AHCA						
				Assistant Deputy Secretary for Medicaid						
			Attorney-	to EOG's Office re: discussion of						
41	AHCA0159581	Pdf	Client;Work-Product	caselaw and legal developments.						
				Attachment to email from AHCA						
				Assistant Deputy Secretary for Medicaid						
4.0	ALIO A 0.4 F0.000	D-If	Attorney-	to EOG's Office re: discussion of caselaw and legal developments.						
42	AHCA0159622	Pdf	Client;Work-Product	caseiaw and legal developments.						
				Attachment to email from AHCA						
				Assistant Deputy Secretary for Medicaid						
43	AHCA0159640	Pdf	Attorney- Client;Work-Product	to EOG's Office re: discussion of caselaw and legal developments.						
				Email from AHCA General Counsel's				""Weida"",""	""Weida"",""	
l l		5.4	Attorney-	Office to Assistant Deputy Secretary for	0/40/0000 0 40 444		0	Jason; <jason.weida@ahca.m< td=""><td></td><td></td></jason.weida@ahca.m<>		
44	AHCA0160500	Pdf	Client;Work-Product	Medicaid re: legal developments.  Attachment to email from AHCA General	6/13/2022 8:43 AM	Lange v. Houston County	Sheeran, Andrew	yflorida.com>	myflorida.com>	
			1	Counsel's Office to Assistant Deputy						
[ <u>,  </u> ]		D.:	Attorney-	Secretary for Medicaid re: legal						
45	AHCA0160501	Pdf	Client;Work-Product	developments.  Email from AHCA Assistant Deputy						
			1	Secretary to EOG General Counsel's				""Furino"",""	""Furino"",""	
			Attorney-	Office re: discussion of legal				Maureen; <maureen.furino@e< td=""><td>Maureen;<maureen.furino@< td=""><td></td></maureen.furino@<></td></maureen.furino@e<>	Maureen; <maureen.furino@< td=""><td></td></maureen.furino@<>	
46	AHCA0160534	Pdf	Client;Work-Product	developments.  Attachment to email from AHCA	6/13/2022 8:53 AM	Georgia Case	Weida, Jason	og.myflorida.com>	eog.myflorida.com>	
			Attorney-	Assistant Deputy Secretary to EOG re:						
47	AHCA0160535	Pdf	Client;Work-Product	discussion of legal developments.						
			Attornov	Email between General Counsel's office				""Sheeran"","" Andrew; <andrew.sheeran@a< td=""><td>""Sheeran"","" Andrew;<andrew.sheeran@< td=""><td></td></andrew.sheeran@<></td></andrew.sheeran@a<>	""Sheeran"","" Andrew; <andrew.sheeran@< td=""><td></td></andrew.sheeran@<>	
48	AHCA0162930	Pdf	Attorney- Client;Work-Product	and outside counsel concerning ongoing litigation.	6/13/2022 1:20 PM	claire v florida complaint.pdf	Christopher Lunny	hca.myflorida.com>	ahca.myflorida.com>	
			,	Attachment to email between General			,	,	,	
			Attorna	Counsel's office and outside counsel						
49	AHCA0162931	Pdf	Attorney- Client;Work-Product	concerning ongoing litigation; complaint attached.						
<u> </u>				Email between General Counsel's office				""Sheeran"",""	""Sheeran"",""	
		5.4	Attorney-	and outside counsel concerning ongoing	0/40/0000 4 05			Andrew; <andrew.sheeran@a< td=""><td>Andrew;<andrew.sheeran@< td=""><td></td></andrew.sheeran@<></td></andrew.sheeran@a<>	Andrew; <andrew.sheeran@< td=""><td></td></andrew.sheeran@<>	
50	AHCA0162984	Pdf	Client;Work-Product	litigation.  Attachment to email between General	6/13/2022 1:22 PM	Keohane v Jones.rtf	Christopher Lunny	hca.myflorida.com>	ahca.myflorida.com>	
			Attorney-	Counsel's office and outside counsel						
51	AHCA0162985	Pdf	Client;Work-Product	concerning ongoing litigation.						

## Case 4:22-cv-00325-RH-MAF Document 109-4 Filed 03/02/23 Page 5 of 19

	А	В	С	D	E	F	G	Н	I	J
				Email from Assistant Deputy Secretary				""Furino"",""	""Furino"",""	
			Attorney-	for Medicaid to EOG General Counsel's				Maureen; <maureen.furino@e< td=""><td></td><td></td></maureen.furino@e<>		
52	AHCA0163009	Pdf	Client;Work-Product	Office regarding amicus brief.	6/13/2022 3:45 PM		Weida, Jason	og.myflorida.com>	eog.myflorida.com>	
				Attachment to email from Assistant Deputy Secretary for Medicaid to EOG						
			Attorney-	General Counsel's Office regarding						
53	AHCA0163010	Pdf	Client;Work-Product	amicus brief.						
				Email between AHCA Chief of Staff and				""Sheeran"",""	""Sheeran"",""	
54	AHCA0163217	Pdf	Attorney- Client;Work-Product	General Counsel's Office regarding similiar litigation.	6/14/2022 9:33 AM	FW: Privileged & Confidential	Weida, Jason	Andrew; <andrew.sheeran@a hca.myflorida.com&gt;</andrew.sheeran@a 	Andrew; <andrew.sheeran@ ahca.myflorida.com&gt;</andrew.sheeran@ 	
54	AITOAUTUUZIT	i ui	Client, Work-i Toddci	Attachment to Email between AHCA	0/14/2022 9.33 AW	1 W. 1 Hvileged & Corilideritial	Weida, Jason	nca.mynonda.com>	anca.mynonda.com>	
				Chief of Staff and General Counsel's						
	ALIO A 04 00040	Date	Attorney-	Office regarding similar litigation;						
55	AHCA0163218	Pdf	Client;Work-Product	pleadings. Attachment to Email between AHCA						
				Chief of Staff and General Counsel's						
			Attorney-	Office regarding similar litigation;						
56	AHCA0163259	Pdf	Client;Work-Product	pleadings.						
				Attachment to Email between AHCA Chief of Staff and General Counsel's						
			Attorney-	Office regarding similar litigation;						
57	AHCA0163277	Pdf	Client;Work-Product	pleadings.						
1 [			Attornov	Email between AHCA Chief of Staff and EOG General Counsel's Office				""Sheeran"","" Andrew; <andrew.sheeran@a< td=""><td>""Sheeran"","" Andrew;<andrew.sheeran@< td=""><td></td></andrew.sheeran@<></td></andrew.sheeran@a<>	""Sheeran"","" Andrew; <andrew.sheeran@< td=""><td></td></andrew.sheeran@<>	
58	AHCA0163309	Pdf	Attorney- Client;Work-Product	regarding similar litigation.	6/14/2022 9:33 AM	FW: Georgia Case	Weida, Jason	hca.myflorida.com>	ahca.myflorida.com>	
				Attachment to Email between AHCA		===igia oaco	, 000011			
				Chief of Staff and EOG General						
59	AHCA0163310	Pdf	Attorney- Client;Work-Product	Counsel's Office regarding similar litigation.						
59	ALICAGIDOSTO	rui	OHERIC, VVOIK-PRODUCT	nugation.						
			Attorney-	Email by lawyer to himself regarding				<jason.weida@ahca.myflorida.< td=""><td></td><td></td></jason.weida@ahca.myflorida.<>		
60	AHCA0163343	Pdf	Client;Work-Product	similar litigation.	6/14/2022 9:34 AM		Jason Weida	com>	a.com>	
			Attorney-	Attachment (court opinion) of email by lawyer to himself regarding similar						
61	AHCA0163344	Pdf	Client;Work-Product	litigation.						
				Email between AHCA Chief of Staff and				""Sheeran"",""	""Sheeran"",""	
62	AHCA0163367	Pdf	Attorney- Client;Work-Product	General Counsel's Office regarding similar litigation.	6/14/2022 9:34 AM	FW:	Weida, Jason	Andrew; <andrew.sheeran@a hca.myflorida.com&gt;</andrew.sheeran@a 	Andrew; <andrew.sheeran@ ahca.myflorida.com&gt;</andrew.sheeran@ 	
02	ATUAU 103307	Pai	Ciletit, VVOFK-Product	Attachment to Email between AHCA	U/ 14/2U22 9:34 AM	FVV:	vveiua, Jason	nca.mynonda.com>	anca.mynorida.com>	
			Attorney-	Chief of Staff and General Counsel's						
63	AHCA0163368	Pdf	Client;Work-Product	Office regarding similar litigation.				HHIZ II HH HH		
			Attorney-	Email between AHCA General Counsel's Office regarding similar				""Kellum"","" Kim; <kim.kellum@ahca.myflo< td=""><td>""Kellum"","" Kim:<kim kellum@ahca="" mvfl<="" td=""><td></td></kim></td></kim.kellum@ahca.myflo<>	""Kellum"","" Kim: <kim kellum@ahca="" mvfl<="" td=""><td></td></kim>	
64	AHCA0164568	Pdf	Client;Work-Product	litigation.	6/14/2022 11:34 AM	ATTORNEY WORK PRODUCT	Sheeran, Andrew	rida.com>	orida.com>	
				Email between Chief of Staff and AHCA						
0.5	ALICA0464560	Dat	Attorney-	General Counsel's Office regarding	6/44/2022 0-22 AM	FIM. Debiloged & Confidential	Maida Jasan	Chassan Andrew	Chasses Andrew	
65	AHCA0164569	Pdf	Client;Work-Product	similar litigation. Attachment to Email between AHCA	6/14/2022 9:33 AM	FW: Privileged & Confidential	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
			Attorney-	General Counsel's Office regarding						
66	AHCA0164570	Pdf	Client;Work-Product	similar litigation.						
			Attorney-	Attachment to Email between AHCA General Counsel's Office regarding						
67	AHCA0164611	Pdf	Client;Work-Product	similar litigation.						
				Attachment to Email between AHCA						
60	ALICA0404000	D-14	Attorney-	General Counsel's Office regarding						
68	AHCA0164629	Pdf	Client;Work-Product	similar litigation.						
				Email between AHCA Assistant Deputy						
			Attorney-	Secretary and AHCA General Counsel's				l		
69	AHCA0164661	Pdf	Client;Work-Product	Office regarding similar litigation.  Attachment to Email between AHCA	6/14/2022 9:33 AM	FW: Georgia Case	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
				Assistant Deputy Secretary and AHCA						
			Attorney-	General Counsel's Office regarding						
70	AHCA0164662	Pdf	Client;Work-Product	similar litigation.						
				Email between AHCA Assistant Deputy						
			Attorney-	Secretary and AHCA General Counsel's						
71	AHCA0164695	Pdf	Client;Work-Product	Office regarding similar litigation.	6/14/2022 9:33 AM	FW: WV	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
				Attachment to Email between AHCA Assistant Deputy Secretary and AHCA						
			Attorney-	General Counsel's Office regarding						
72	AHCA0164696	Pdf	Client;Work-Product							
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				Attachment to Email between AHCA						
			A.44	Assistant Deputy Secretary and AHCA						
72	AHCA0164741	Pdf	Attorney- Client;Work-Product	General Counsel's Office regarding similar litigation.						
73	ARCA0104741	Pul	Client, Work-Product	similar liugation.						
				Email between AHCA Assistant Deputy						
			Attorney-	Secretary and AHCA General Counsel's						
74	AHCA0164773	Pdf	Client;Work-Product	Office regarding similar litigation.	6/14/2022 9:34 AM	FW:	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
				Attachment to Email between AHCA						
				Assistant Deputy Secretary and AHCA						
75	AHCA0164774	Pdf	Attorney- Client;Work-Product	General Counsel's Office regarding similar litigation.						
13	AHCA0104774	Fui	Ciletit, VVOIK-FTOUUCE	Email between AHCA General				""Grantham"",""	""Grantham"",""	
			Attorney-	Counsel's Office staff regarding similar		FW: ATTORNEY WORK		Shena; <shena.grantham@ah< td=""><td></td><td></td></shena.grantham@ah<>		
76	AHCA0164797	Pdf	Client;Work-Product	litigation.	6/14/2022 1:23 PM	PRODUCT	Kellum, Kim	ca.myflorida.com>	hca.myflorida.com>	
				Email between AHCA Assistant Deputy						
	ALIO A 04 0 4 7 0 0	Date	Attorney-	Secretary and AHCA General Counsel's	0/44/0000 0:00 444	FM: Drivita and 0 Confidential	10/-:	Observed Andrews	Observe Andrews	
77	AHCA0164798	Pdf	Client;Work-Product	Office regarding similar litigation.  Attachment to Email between AHCA	6/14/2022 9:33 AM	FW: Privileged & Confidential	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
				Assistant Deputy Secretary and AHCA						
			Attorney-	General Counsel's Office regarding						
78	AHCA0164799	Pdf	Client;Work-Product	similar litigation.						
				Attachment to Email between AHCA						
				Assistant Deputy Secretary and AHCA						
79	AHCA0164840	Pdf	Attorney- Client;Work-Product	General Counsel's Office regarding similar litigation.						
79	ARCA0104040	Pui	Client, Work-Product	Attachment to Email between AHCA						
				Assistant Deputy Secretary and AHCA						
			Attorney-	General Counsel's Office regarding						
80	AHCA0164858	Pdf	Client;Work-Product	similar litigation.						
				Email between AHCA Assistant Deputy						
0.4	AHCA0164890	Pdf	Attorney- Client;Work-Product	Secretary and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: Georgia Case	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
81	ARCA0104690	Pui	Client, Work-Product	Attachment to Email between AHCA	0/ 14/2022 9.33 AIVI	FW. Georgia Case	weida, Jason	Sneeran, Andrew	Sheeran, Andrew	
				Assistant Deputy Secretary and AHCA						
			Attorney-	General Counsel's Office regarding						
82	AHCA0164891	Pdf	Client;Work-Product	similar litigation.						
			A 44	Email between AHCA Assistant Deputy						
83	AHCA0164924	Pdf	Attorney- Client;Work-Product	Secretary and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: WV	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
00	71110710104324	ı uı	Olichi, Work-1 Toddot	Attachment to Email between AHCA	0/14/2022 3:00 / twi	1 ***. ***	Wolda, Bason	Oncoran, Andrew	Oncoran, Andrew	
				Assistant Deputy Secretary and AHCA						
			Attorney-	General Counsel's Office regarding						
84	AHCA0164925	Pdf	Client;Work-Product	similar litigation.						
				Attachment to Email between AHCA						
			Attorney-	Assistant Deputy Secretary and AHCA General Counsel's Office regarding						
85	AHCA0164970	Pdf	Client;Work-Product							
30				ommar nagadom						
				Email between AHCA Assistant Deputy						
			Attorney-	Secretary and AHCA General Counsel's						
86	AHCA0165002	Pdf	Client;Work-Product	Office regarding similar litigation.	6/14/2022 9:34 AM	FW:	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
				Attachment to Email between AHCA Assistant Deputy Secretary and AHCA						
			Attorney-	General Counsel's Office regarding						
87	AHCA0165003	Pdf	Client;Work-Product	similar litigation.						
			,	Email between General Counsel and				""Tamayo"",""	""Tamayo"",""	
			Attorney-	General Counsel staff regarding				Josefina; <josefina.tamayo@< td=""><td>Josefina;<josefina.tamayo< td=""><td></td></josefina.tamayo<></td></josefina.tamayo@<>	Josefina; <josefina.tamayo< td=""><td></td></josefina.tamayo<>	
88	AHCA0165028	Pdf	Client;Work-Product	caselaw research.	6/14/2022 5:19 PM	RE: Cases	Sheeran, Andrew	ahca.myflorida.com>	@ahca.myflorida.com>	
				5				""Tamayo"",""	WTWW	
				Email between EOG General Counsel's Office and AHCA General Counsel				Josefina; <josefina.tamayo@ ahca.myflorida.com="">;Sheeran,</josefina.tamayo@>	""Tamayo"","" Josefina; <josefina.tamayo< td=""><td></td></josefina.tamayo<>	
- 1			Work-Product	relating to similar litigation.	6/28/2022 7:28 PM	FW: Doe v. Snyder	Furino, Maureen	Andrew	@ahca.myflorida.com>	Sheeran, Andrew
89	AHCA0178543	Pdf				555 v. Onydor	. ao, maaroon	, and ove	Garroanny normanooning	5.155.a.i., / tilalott
89	AHCA0178543	Pdf	WOIK-FIOUUCI	Attachment to Email between EOG						
89	AHCA0178543	Pdf	WOIK-Floudet							
89	AHCA0178543 AHCA0178544	Pdf	Work-Product	Attachment to Email between EOG						

### Case 4:22-cv-00325-RH-MAF Document 109-4 Filed 03/02/23 Page 7 of 19

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								"Weida"","" Jason;"	"Weida"","" Jason;"	
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				Email between AHCA General Counsel				eran@ahca.myflorida.com>;<	eeran@ahca.myflorida.com>;	
			Attorney-	and outside counsel relating to similar				Shena.Grantham@ahca.myflo	<shena.grantham@ahca.my< td=""><td></td></shena.grantham@ahca.my<>	
91	AHCA0178580	Pdf	Client;Work-Product	litigation.	6/29/2022 5:28 AM	Fwd: Doe v. Snyder	Tamayo, Josefina	rida.com>	florida.com>	
				Attachment to Email between AHCA						
92	AHCA0178582	Pdf	Attorney- Client;Work-Product	General Counsel and outside counsel						
92	AUCA01/0002	Pui	Client, Work-Product	relating to similar litigation.				Mohammad O. Jazil; Gary V.	Mohammad O. Jazil; Gary V.	
								Perko;" "Kellum"","" Kim;"	Perko;" "Kellum"","" Kim;"	
				Email between General Counsel's				"Grantham"","" Shena;"	"Grantham"","" Shena;"	
				Office, staff, and outside counsel				"Tamayo"","" Josefina;"	"Tamayo"","" Josefina;"	
00	ALICA040404	Dat	Attorney-	regarding compliance with federal	7/4/2022 4-E4 DM	ATTORNEY WORK PRODUCT	Chassan Andrew	Weida"," Jason;"Brackett"",""	Weida"," Jason;"Brackett"",""	
93	AHCA0180494	Pdf	Client;Work-Product	statutory requirements.	7/1/2022 1:51 PM	PRIVILEGED AND EXEMPT	Sheeran, Andrew	Matt ""Tamayo"","" Josefina;"	Matt ""Tamayo"","" Josefina;"	
				Email between outside counsel and		Attorney Client Privileged &		"Weida"","" Jason;"	"Weida"","" Jason;"	
			Attorney-	General Counsel's Office regarding draft		Confidential / Attorney Work		"Sheeran"","" Andrew;"	"Sheeran"","" Andrew;"	
94	AHCA0181336	Pdf	Client;Work-Product	script.	7/4/2022 9:25 AM	Product / July 8th Hearing	Mohammad O. Jazil	"Grantham"","" Shena	"Grantham"","" Shena	
1 [				Double and a family about 1						
95	AHCA0181337	Pdf	Attorney- Client;Work-Product	Draft remarks/script. shared with counsel for review and comment.						
55				The second secon				<mjazil@holtzmanvogel.com></mjazil@holtzmanvogel.com>	<mjazil@holtzmanvogel.com< td=""><td></td></mjazil@holtzmanvogel.com<>	
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			Attorney-	Email between General Counsel and outside counsel regarding comments				Grantham"," Shena;"Kellum"","" Kim;"	Grantham"," Shena;"Kellum"","" Kim;"	
96	AHCA0181345	Pdf	Client;Work-Product	and strategy for rulemaking.	7/4/2022 10:57 AM	Rule hearing edits (confidential	Tamayo, Josefina	"Giering"","" Cole	"Giering"","" Cole	
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1	**********	D.16	Attorney-	Draft remarks/script provided to counsel						
97	AHCA0181346	Pdf	Client;Work-Product	for review and comments.						
								""Tamayo"",""	""Tamayo"",""	
								Josefina; <mjazil@holtzmanvo< td=""><td>Josefina;<mjazil@holtzmanv< td=""><td></td></mjazil@holtzmanv<></td></mjazil@holtzmanvo<>	Josefina; <mjazil@holtzmanv< td=""><td></td></mjazil@holtzmanv<>	
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								vogel.com>;" "Sheeran"",""	anvogel.com>;" "Sheeran"",""	
				Email between counsel regarding		RE: Rule hearing edits		Andrew;" Grantham"," Shena;"Kellum"","" Kim;"	Andrew;" Grantham"," Shena;"Kellum"","" Kim;"	
98	AHCA0181390	Pdf	Work-Product	preparation for rulemaking proceedings.	7/5/2022 9:53 AM	(confidential	Weida, Jason	"Giering"","" Cole;Zack	"Giering"","" Cole	Zack
99	AHCA0181391	Pdf	Work-Product	Draft remarks/script.		,	,			
								""Tamayo"","" Josefina;"	""Tamayo"","" Josefina;"	
								"Kellum"","" Kim;" "Sheeran"",""	"Kellum"","" Kim;" "Sheeran"",""	
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		D.16		Email between counsel regarding edits	7/5/0000 40 50	55.51.1		>; <kim.kellum@ahca.myflorid< td=""><td>om&gt;;<kim.kellum@ahca.myf< td=""><td></td></kim.kellum@ahca.myf<></td></kim.kellum@ahca.myflorid<>	om>; <kim.kellum@ahca.myf< td=""><td></td></kim.kellum@ahca.myf<>	
100	AHCA0181397 AHCA0181398	Pdf Pdf	Work-Product Work-Product	to hearing script.  Draft remarks/script.	7/5/2022 10:50 AM	RE: Rule document	Grantham, Shena	a.com>	lorida.com>	
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								"Sheeran"","" Andrew;"	"Sheeran"","" Andrew;"	
								"Kellum"",""	"Kellum"",""	
								Kim; <andrew.sheeran@ahca.< td=""><td>Kim;<andrew.sheeran@ahc< td=""><td></td></andrew.sheeran@ahc<></td></andrew.sheeran@ahca.<>	Kim; <andrew.sheeran@ahc< td=""><td></td></andrew.sheeran@ahc<>	
								myflorida.com>; <kim.kellum @ahca.myflorida.com&gt;;<shen< td=""><td>a.myflorida.com&gt;;<kim.kellu m@ahca.myflorida.com&gt;;<s< td=""><td></td></s<></kim.kellu </td></shen<></kim.kellum 	a.myflorida.com>; <kim.kellu m@ahca.myflorida.com&gt;;<s< td=""><td></td></s<></kim.kellu 	
				Email between counsel regarding edits				a.Grantham@ahca.myflorida.c		
102	AHCA0181404	Pdf	Work-Product	to hearing script.	7/5/2022 11:08 AM	Edits	Tamayo, Josefina	om>	ida.com>	
103	AHCA0181405	Pdf	Work-Product	Draft remarks/script for hearing.				""Tomovo"" ""		
								""Tamayo"","" Josefina; <josefina.tamayo@< td=""><td>""Tamayo"",""</td><td></td></josefina.tamayo@<>	""Tamayo"",""	
				Email between counsel regarding edits				ahca.myflorida.com>;Sheeran,	Josefina; <josefina.tamayo< td=""><td>Sheeran, Andrew; Kellum,</td></josefina.tamayo<>	Sheeran, Andrew; Kellum,
104	AHCA0181411	Pdf	Work-Product	to hearing script.	7/5/2022 11:14 AM	RE: Edits	Grantham, Shena	Andrew;Kellum, Kim	@ahca.myflorida.com>	Kim
105	AHCA0181412	Pdf	Work-Product	Draft remarks and script for hearing.						
106	AHCA0181423	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 11:14 AM	RE: Edits	Grantham, Shena	Tamayo, Josefina;Sheeran, Andrew;Kellum, Kim	Tamayo, Josefina	Sheeran, Andrew;Kellum, Kim
106	AHCA0181423 AHCA0181424	Pdf	Work-Product Work-Product	Draft remarks and script for hearing.	11012022 11.14 AM	RE. EUIS	Graninam, Snena	Andrew, Nellum, NIM	ramayo, Josenna	NIII
								1	l	

## Case 4:22-cv-00325-RH-MAF Document 109-4 Filed 03/02/23 Page 8 of 19

	Α	В	С	D	E	F	G	Н	1	J
				Email between counsel regarding edits				""Tamayo"","" Josefina;Gary V Perko;Zack Bennington;" "Grantham"","" Shena;" "Sheeran"","" Andrew;" Weida"," Jason;"Kellum'",""	""Tamayo"","" Josefina;Gary V. Perko;Zack Bennington;" "Grantham"","" Shena;" "Sheeran"","" Andrew;" Weida"," Jason:"Kellum"",""	
108	AHCA0181431	Pdf	Work-Product	to hearing script.	7/5/2022 2:05 PM	RE: Rule Document (Confidential	Mohammad O. Jazil	Kim;" "Giering"","" Cole	Kim;" "Giering"","" Cole	
109	AHCA0181432	Pdf	Work-Product	Attachment to email, notes on quality of evidence and discrimination questions and answers.						
110	AHCA0181456	Pdf	Work-Product	Email between counsel regarding edits Quality of Evidence Discrimination QA.	7/5/2022 3:39 PM	Quality of Evidence Discrimination QA / Attorney Work Product / Confidential	Mohammad O. Jazil	Michael Beato;" "Sheeran"","" Andrew;Gary V. Perko;" "Tamayo"","" Josefina;" "Weida"","" Jason; <jason.weida@ahca.m< td=""><td>Michael Beato;" "Sheeran"","" Andrew;Gary V. Perko;" "Tamayo"","" Josefina;" "Weida"","" Jason;SJason,Weida@ahca. myflorida.com&gt;</td><td></td></jason.weida@ahca.m<>	Michael Beato;" "Sheeran"","" Andrew;Gary V. Perko;" "Tamayo"","" Josefina;" "Weida"","" Jason;SJason,Weida@ahca. myflorida.com>	
110				Attachment to email, notes and redlines on Quality of Evidence and	77372022 3.39 T W	work i routet/ confidential	Worldmind C. Jazii	yiioiida.com>	mynorida.com	
111	AHCA0181457 AHCA0181468	Pdf Pdf	Work-Product  Work-Product	Discrimination QA.  Email between counsel regarding edits to hearing script.	7/5/2022 3:50 PM	Edits to the Meeting	Grantham, Shena	Tamayo, Josefina;Templeton, Mary Gay;Sheeran, Andrew;Kellum, Kim;Brackett"," Matt;"Weida"","" Jason;" "Kellum"",""	Tamayo, Josefina;Templeton, Mary Gay;Sheeran, Andrew;Kellum, Kim;Brackett"," Matt;"Weida"","" Jason;" "Kellum"",""	
113	AHCA0181469	Pdf	Work-Product	Draft remarks and script for hearing.						
114	AHCA0181482	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 5:46 PM	FW: Edits to the Meeting	Tamayo, Josefina	<pre><mjazil@holtzmanvogel.com> ;<pperko@holtzmanvogel.com>;" "Sheeran";" "Andrew;" "Grantham""," "Shena;" Giering"," Cole;"Brackett","" Matti," "Weida"","" Jason;" "Kellum"," "Kim</pperko@holtzmanvogel.com></mjazil@holtzmanvogel.com></pre>	<pre><mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.c om="">;""Sheeran","""Andrew," "Grantham"",""Shena;" Gierting","Cole;"Brackett","" Matti,"Weida"","" Jason;" "Kellum","" Kim</gperko@holtzmanvogel.c></mjazil@holtzmanvogel.com></pre>	
115	AHCA0181483	Pdf	Work-Product	Draft remarks and script for hearing.						
116	AHCA0181495	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 7:27 PM	FW: Edits to the Meeting	Tamayo, Josefina	Mohammad O. Jazil;Gary Perko;" "Sheeran"", "" Andrew; "Grantham", "" Shena;" "Giering"", "" Cole;" Brackett"," Matt; Weida"", "" Jason;" "Kellum"', "" Kim	Mohammad O. Jazil;Gary Perko;" "Sheeran""; "" Andrew;" "Grantham"; "" Shena;" "Giering"", "" Cole;" Brackett", "Matt; "Weida"", "" Jason;" "Kellum"', "" Kim	
117	AHCA0181496	Pdf	Work-Product	Draft remarks and script for hearing.				""Grantham"",""	""Grantham"",""	
118	AHCA0181525	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/6/2022 8:40 AM	FW: Edits to the Meeting	Giering, Cole	Shena; <shena.grantham@ah ca.myflorida.com&gt;</shena.grantham@ah 	Shena; <shena.grantham@a hca.myflorida.com&gt;</shena.grantham@a 	
119	AHCA0181526	Pdf	Work-Product	Draft remarks and script for hearing.	1,5/2022 0.40 AW	Edito to the Westing	Sicring, cole	Sa.mynonaa.com>		
120	AHCA0181531	Pdf	Attorney- Client;Work-Product	Email between counsel regarding edits to hearing script.	7/6/2022 8:46 AM	RE: Edits to the Meeting	Grantham, Shena	""Giering"","" Cole;" "Tamayo"","" Josefina;Mohammad O. Jazil;Gary V. Perko;" "Sheeran"","" Andrew;" Mattson"," John;"Kellum","" Kim;" "Weida"","" Jason	""Glering"","" Cole;" "Tamayo"","" Josefina;Mohammad O. Jazii;Gary V. Perko;" "Sheeran"","" Andrew;" Mattson"," John;"Kellum","" Kim;" "Weida"","" Jason	
121	AHCA0181532	Pdf	Work-Product	Draft remarks and script for hearing.				""Grantham"",""	""Grantham"",""	
122 123	AHCA0181594 AHCA0181596	Pdf Pdf	Work-Product Work-Product	Email between counsel regarding edits to hearing script.  Draft remarks and script for hearing.	7/7/2022 10:51 AM	RE: Edits to the Meeting	Giering, Cole	Shena; <shena.grantham@ah ca.myflorida.com&gt;</shena.grantham@ah 		
124	AHCA0181627 AHCA0181628	Pdf Pdf	Work-Product Work-Product	Email between counsel regarding edits to hearing script.  Draft remarks and script for hearing.	7/7/2022 12:35 PM	CONFIDENTIAL WORK PRODUCT: Draft Script Revised	Grantham, Shena	Mohammad O. Jazil;Gary V. Perko;" "Sheeran","" Andrew;" "Tamayo"","" Josefina;" "Giering"","" Cole;"	Mohammad O. Jazil;Gary V. Perko;" "Sheeran"", "" Andrew;" "Tamayo"", "" Josefina;" "Giering"", "" Cole;"	
126	AHCA0183889	Pdf	Attorney- Client;Work-Product	Email between General Counsel's Office staff regarding submission of public comments for rulemaking hearing.	7/12/2022 9:03 AM	FW: Comments	Grantham, Shena	""Sheeran"","" Andrew; <andrew.sheeran@a hca.myflorida.com&gt;</andrew.sheeran@a 	""Sheeran"","" Andrew; <andrew.sheeran@ ahca.myflorida.com=""></andrew.sheeran@>	

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П	А	В	С	D	E	F	G	Н	I	J
127	AHCA0192681	Pdf	Attorney- Client;Work-Product	Email between General Counsel's office staff regarding comments on DOH Petition.	7/18/2022 9:33 AM	proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Sheeran, Andrew	""Tamayo"","" Josefina;" "Kellum"","" Kim;" "Grantham"","" Shena; <josefina.tamayo@ah ca.myflorida.com="">;<kiim.kellu m@ahca.myflorida.com=""></kiim.kellu></josefina.tamayo@ah>	""Tamayo"","" Josefina;" "Kellum"","" Kim;" "Grantham"","" Shena; <josefina.tamayo@a hca.myflorida.com="">;<kim.kel lum@ahca.myflorida.com=""></kim.kel></josefina.tamayo@a>	
128	AHCA0192682	Pdf	Attorney- Client;Work-Product	Attachment, proposed language by DOH.						
129	AHCA0192706	Pdf	Attorney- Client;Work-Product	Email between General Counsel's office staff regarding board proposal.	7/18/2022 10:02 AM	RE: proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Sheeran, Andrew	""Tamayo"", "" Josefina;" "Kellum"", "' Kim;" "Grantham": "" Shena; <josefina. ca.myflorida.com="" tamayo@ah="">; Kim. Kellu m@ahca.myflorida.com&gt;</josefina.>	""Tamayo"", "" Josefina;" "Kellum"", "' Kim;" "Grantham": "" Shena; <josefina.tamayo@a hca.myflorida.com="">;<kim.kel lum@ahca.myflorida.com=""></kim.kel></josefina.tamayo@a>	
130	AHCA0192707	Pdf	Attorney- Client;Work-Product	Attachment, proposed language by DOH.						
131	AHCA0192721	Pdf	Attorney- Client;Work-Product	Email between General Counsel office staff regarding board proposal.	7/18/2022 10:13 AM		Grantham, Shena	""Sheeran"","" Andrew;" "Tamayo"","" Josefina;" "Kellum"","" Kim; <josefina. myflorida.com="" tamayo@ahca.="">:<andrew.she< td=""><td>""Sheeran"", "" Andrew;" "Tamayo", "" Josefina;" "Kellum"", "" Kim;<josefina.tamayo@ahc a.myflorida.com="">;<andrew.s heeran@ahca.myflorida.com<="" td=""><td></td></andrew.s></josefina.tamayo@ahc></td></andrew.she<></josefina.>	""Sheeran"", "" Andrew;" "Tamayo", "" Josefina;" "Kellum"", "" Kim; <josefina.tamayo@ahc a.myflorida.com="">;<andrew.s heeran@ahca.myflorida.com<="" td=""><td></td></andrew.s></josefina.tamayo@ahc>	
132	AHCA0196165	Pdf	Attorney- Client;Work-Product	Email between General Counsel and staff regarding DOH petition.	7/18/2022 1:58 PM	FW: proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Tamayo, Josefina	""Templeton"","" Mary Gay; <marygay.templeton@a hca.myflorida.com&gt;</marygay.templeton@a 	""Templeton"","" Mary Gay; <marygay.templeton@ ahca.myflorida.com&gt;</marygay.templeton@ 	
133	AHCA0196166	Pdf	Attorney- Client;Work-Product	Attachment, DOH proposed language.						
134	AHCA0196168	Pdf	Attorney- Client;Work-Product	Email between General Counsel and staff regarding DOH petition.	7/18/2022 1:58 PM	FW: proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Templeton, Mary Gay	""Tamayo"","" Josefina; <josefina.tamayo@ ahca.myflorida.com=""></josefina.tamayo@>	""Tamayo"","" Josefina; <josefina.tamayo @ahca.myflorida.com=""></josefina.tamayo>	
135	AHCA0196169	Pdf	Attorney- Client;Work-Product	Attachment, language proposed by DOH.			, , , , ,	,	,	
136	AHCA0196171	Pdf	Attorney- Client;Work-Product	Email between General Counsel and staff regarding DOH petition.	7/18/2022 2:01 PM	Proposal [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Templeton, Mary Gay	""Tamayo"","" Josefina; <josefina.tamayo@ ahca.myflorida.com=""></josefina.tamayo@>	""Tamayo"","" Josefina; <josefina.tamayo @ahca.myflorida.com=""></josefina.tamayo>	
137	AHCA0196172	Pdf	Attorney- Client;Work-Product	Attachment, language proposed by DOH.						
138	AHCA0196207	Pdf	Attorney- Client;Work-Product	Email between General Counsel and staff regarding DOH petition.	7/18/2022 2:26 PM	FW: proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Templeton, Mary Gay	""Tamayo"","" Josefina; <josefina.tamayo@ ahca.myflorida.com=""></josefina.tamayo@>	""Tamayo"","" Josefina; <josefina.tamayo @ahca.myflorida.com=""></josefina.tamayo>	
139	AHCA0196208	Pdf	Attorney- Client;Work-Product	Attachment, notes and comments on language proposed by DOH.						
140	AHCA0196210	Pdf	Attorney- Client;Work-Product	Email between General Counsel and staff regarding DOH petition.	7/18/2022 2:33 PM	FW: proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Templeton, Mary Gay	""Tamayo"","" Josefina; <josefina.tamayo@ ahca.myflorida.com=""></josefina.tamayo@>	""Tamayo"","" Josefina; <josefina.tamayo @ahca.myflorida.com=""></josefina.tamayo>	
141	AHCA0196211	Pdf	Attorney- Client;Work-Product	Attachment, notes and comments on language proposed by DOH. Email between Matt Brackett and		Comment Summary				
142	AHCA0199136	Pdf	Attorney- Client;Work-Product	Email between Matt Brackett and General Counsel regarding comments and responses to GAPMS report comments.	7/19/2022 2:45 PM	(ATTORNEY WORK PRODUCT CONFIDENTIAL - PURSUANT TO §119.071(1)(d)1.,F.S.)	Brackett, Matt	""Tamayo"","" Josefina; <josefina.tamayo@ ahca.myflorida.com=""></josefina.tamayo@>	""Tamayo"","" Josefina; <josefina.tamayo @ahca.myflorida.com&gt;</josefina.tamayo 	
143	AHCA0199137	Pdf	Attorney- Client;Work-Product	Attachment, 59G-1.050 summary.						
144	AHCA0205234	Pdf	Attorney- Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research and comments that may be used in litigation.	7/20/2022 3:29 PM	RE: Yale (Privileged & Confidential)	Gary V. Perko	""Weida"","" Jason; <jason.weida@ahca.m yflorida.com&gt;</jason.weida@ahca.m 	""Weida"","" Jason; <jason.weida@ahca. myflorida.com&gt;</jason.weida@ahca. 	
145	AHCA0205236	Pdf	Attorney- Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research and comments that may be used in litigation.	7/20/2022 3:30 PM	RE: Yale (Privileged & Confidential)	Weida, Jason	Gary V. Perko	Gary V. Perko	

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	A	В	С	I D	E	F	G	Н	1	
H	^	ь	Ŭ	Email exchange between AHCA			9			J
				Program Administrator and counsel re:						
l l			Attorney-	comments regarding Proposed Rule No.						
146	AHCA0206637	Pdf	Client;Work-Product	59G-1.050.	7/21/2022 10:12 AM	RE: Public comments Comments by Lambda Legal	Giering, Cole	Gary V. Perko; Weida, Jason	Gary V. Perko	Weida, Jason
						regarding Notice of Proposed				
						Rule Changes to Rule No. 59G-				
				Attachment to email exchange between		1.050: General Medicaid Policy				
				AHCA Program Administrator and		(Notice No. 25979915),				
		5.4	Attorney-	counsel re: comments regarding	7/0/0000 5 05 514	Prohibiting Coverage of		MEDICAID DINE		
147	AHCA0206638	Pdf	Client;Work-Product	Proposed Rule No. 59G-1.050.  Attachment to email exchange between	7/8/2022 5:05 PM	Treatment for Gender Dysphoria	Omar Gonzalez-Pagan	MEDICAID RULE	MEDICAID RULE	
				AHCA Program Administrator and						
			Attorney-	counsel re: comments regarding						
148	AHCA0206639	Pdf	Client;Work-Product	Proposed Rule No. 59G-1.050.						
								""Tamayo"","" Josefina;"		
								"Weida"","" Jason;" "Grantham"","" Shena;"	""Tamayo"","" Josefina;" "Weida"","" Jason;"	
				Email from counsel to AHCA General				"Sheeran"",""	"Grantham"","" Shena;"	
				Counsel's Office and Assistant Deputy				Andrew; <josefina.tamayo@a< td=""><td>"Sheeran"",""</td><td></td></josefina.tamayo@a<>	"Sheeran"",""	
			Attorney-	Secretary for Medicaid with legal				hca.myflorida.com>;Mohamm	Andrew; <josefina.tamayo@< td=""><td></td></josefina.tamayo@<>	
149	AHCA0209851	Pdf	Client;Work-Product		7/21/2022 10:39 AM	PRIVILEGED & CONFIDENTIAL	Gary V. Perko	ad O. Jazil	ahca.myflorida.com>	Mohammad O. Jazil
				Attachment to email from counsel to						
				AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid						
			Attorney-	with legal analysis in anticipation of						
150	AHCA0209852	Pdf	Client;Work-Product							
$\Box$									Gary V. Perko;" "Weida"",""	
								Gary V. Perko;" "Weida"",""	Jason;" "Grantham"",""	
								Jason;" "Grantham"","" Shena;" "Sheeran"",""	Shena;" "Sheeran"","" Andrew; <jason.weida@ahc< td=""><td></td></jason.weida@ahc<>	
				Email between counsel and AHCA				Andrew; <jason.weida@ahca.< td=""><td>a.myflorida.com&gt;;<andrew.s< td=""><td></td></andrew.s<></td></jason.weida@ahca.<>	a.myflorida.com>; <andrew.s< td=""><td></td></andrew.s<>	
			Attorney-	General Counsel's Office regarding legal		Re: PRIVILEGED &		myflorida.com>; <andrew.she< td=""><td>heeran@ahca.myflorida.com</td><td></td></andrew.she<>	heeran@ahca.myflorida.com	
151	AHCA0211232	Pdf	Client;Work-Product	analysis in anticipation of litigation.	7/21/2022 11:19 AM	CONFIDENTIAL	Tamayo, Josefina	eran@ahca.myflorida.com>	>	
				Email from AHCA General Counsel's						
			A 44	Office and AHCA Secretary regarding		Fresh DDIV/II FOED 4		""Marstiller"",""	""Marstiller"",""	
152	AHCA0211234	Pdf	Attorney- Client;Work-Product	counsel's legal analysis in anticipation of litigation.	7/21/2022 11:20 AM	Fwd: PRIVILEGED & CONFIDENTIAL	Tamayo, Josefina	Simone; <simone.marstiller@a hca.myflorida.com&gt;</simone.marstiller@a 	Simone; <simone.marstiller@ ahca.myflorida.com&gt;</simone.marstiller@ 	
102	71110710211201		Chorn, Front Froudo	Attachment to email from AHCA General	772 172022 11120 7441	001111111111111111111111111111111111111	rumayo, occomia	noamynonaa.som	andamynonda.com	
				Counsel's Office and AHCA Secretary						
ll			Attorney-	regarding counsel's legal analysis in						
153	AHCA0211235	Pdf	Client;Work-Product	anticipation of litigation. Email between AHCA General				Ryan D. Newman;"	Ryan D. Newman;"	
				Counsel's Office counsel and EOG				"Furino"",""	"Furino"",""	
			Attorney-	regarding legal analysis in anticipation of		Fwd: PRIVILEGED &		Maureen; <maureen.furino@eo< td=""><td></td><td></td></maureen.furino@eo<>		
154	AHCA0211282	Pdf	Client;Work-Product	litigation.	7/21/2022 4:50 PM	CONFIDENTIAL	Tamayo, Josefina	g.myflorida.com>	og.myflorida.com>	
				Attachment to email between AHCA						
			Attorney-	General Counsel's Office counsel						
155	AHCA0211283	Pdf	Client;Work-Product	regarding legal analysis in anticipation of litigation.						
			,							
				Email exchange between AHCA				miriam grossman;Tamayo,		Tamayo,
				Assistant Deputy Secretary for Medicaid		DE: V-I- /B : "		Josefina; <mjazil@holtzmanvo< td=""><td></td><td>Josefina;<mjazil@holtzmanv< td=""></mjazil@holtzmanv<></td></mjazil@holtzmanvo<>		Josefina; <mjazil@holtzmanv< td=""></mjazil@holtzmanv<>
156	AHCA0226988	Pdf	Attorney- Client;Work-Product	and counsel concerning research and comments that may be used in litigation.	7/25/2022 9:01 AM	RE: Yale (Privileged & Confidential)	Weida, Jason	gel.com>; <gperko@holtzman vogel.com&gt;</gperko@holtzman 	miriam grossman	ogel.com>; <gperko@holtzm anvogel.com&gt;</gperko@holtzm 
130	, 11 IOA0220300	i ui	Onent, VVOIR-FIDUUCI	oomments that may be used in highlion.	TIZUIZUZZ S.U I AIVI	Oomideridar)	vvciua, Jasuii	vogei.com/	minam grossman	anvogel.com/
				Email exchange between AHCA				""Weida"",""		
				Assistant Deputy Secretary for Medicaid				Jason; <josefina.tamayo@ah< td=""><td>""Weida"",""</td><td></td></josefina.tamayo@ah<>	""Weida"",""	
	411040000004	D.11	Attorney-	and counsel concerning research and	7/05/0005 5 55 4::	RE: Yale (Privileged &	0	ca.myflorida.com>;Tamayo,	Jason; <josefina.tamayo@a< td=""><td>Tamayo,</td></josefina.tamayo@a<>	Tamayo,
157	AHCA0226991	Pdf	Client;Work-Product	comments that may be used in litigation.	7/25/2022 9:02 AM	Confidential)	Gary V. Perko	Josefina;Mohammad O. Jazil	hca.myflorida.com>	Josefina;Mohammad O. Jazil
				Email exchange between AHCA						
				Assistant Deputy Secretary for Medicaid						
			Attorney-	and counsel concerning research and		RE: Yale (Privileged &		Gary V. Perko; Tamayo,		Tamayo,
158	AHCA0226994	Pdf	Client;Work-Product	comments that may be used in litigation.	7/25/2022 9:13 AM	Confidential)	Weida, Jason	Josefina;Mohammad O. Jazil	Gary V. Perko	Josefina;Mohammad O. Jazil
				Email evaluance between ALICA				""Weida"",""		
				Email exchange between AHCA Assistant Deputy Secretary for Medicaid				Jason; <josefina.tamayo@ah< td=""><td>""Weida"",""</td><td></td></josefina.tamayo@ah<>	""Weida"",""	
			Attorney-	and counsel concerning research and		RE: Yale (Privileged &		ca.myflorida.com>;Tamayo,	Jason; <josefina.tamayo@a< td=""><td>Tamayo,</td></josefina.tamayo@a<>	Tamayo,
159	AHCA0226998	Pdf	Client;Work-Product		7/25/2022 9:16 AM	Confidential)	Gary V. Perko	Josefina;Mohammad O. Jazil	hca.myflorida.com>	Josefina;Mohammad O. Jazil
				Email exchange between AHCA Assistant Deputy Secretary for Medicaid						
			Attorney-	and counsel concerning research and		RE: Yale (Privileged &		Gary V. Perko;Tamayo,		Tamayo,
1400	AHCA0227002	Pdf		comments that may be used in litigation.	7/25/2022 9:17 AM	Confidential)	Weida, Jason	Josefina; Mohammad O. Jazil	Gary V. Perko	Josefina;Mohammad O. Jazil
160										

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П	Λ	В	С	D	F	F	G	Н	1	1
	Α			Email exchange between General		'		Gary V. Perko;" "Weida"",""		J
				Counsel's Office and counsel concerning				Jason; <jason.weida@ahca.m< th=""><th>Gary V. Perko;" "Weida"",""</th><th></th></jason.weida@ahca.m<>	Gary V. Perko;" "Weida"",""	
			Attorney-	research and comments that may be		RE: Yale (Privileged &		yflorida.com>;Mohammad O.	Jason; <jason.weida@ahca.< th=""><th></th></jason.weida@ahca.<>	
161	AHCA0227014	Pdf	Client;Work-Product	used in litigation.	7/25/2022 9:23 AM	Confidential)	Tamayo, Josefina	Jazil	myflorida.com>	Mohammad O. Jazil
								""Tamayo"","" Josefina;"		
				Email exchange between General				"Weida"",""	""Tamayo"","" Josefina;"	
				Counsel's Office and counsel concerning				Jason; <jason.weida@ahca.m< th=""><th></th><th></th></jason.weida@ahca.m<>		
			Attorney-	research and comments that may be		RE: Yale (Privileged &		yflorida.com>;Mohammad O.		
162	AHCA0227019	Pdf	Client;Work-Product	used in litigation.	7/25/2022 9:25 AM	Confidential)	Gary V. Perko	Jazil	myflorida.com>	Mohammad O. Jazil
								Mohammad O.		
				F				Jazil; <gperko@holtzmanvogel< th=""><th></th><th></th></gperko@holtzmanvogel<>		
				Email exchange between AHCA Assistant Deputy Secretary for Medicaid				.com>;Tamayo,	Mohammad O	Tamayo, Josefina;Sheeran,
			Attorney-	and counsel concerning research that				Josefina;Sheeran, Andrew;Grantham,	Mohammad O. Jazil; <gperko@holtzmanvog< th=""><th>Andrew;Grantham,</th></gperko@holtzmanvog<>	Andrew;Grantham,
163	AHCA0232369	Pdf	Client;Work-Product	may be used in litigation.	7/28/2022 10:37 AM	Privileged & Confidential	Weida, Jason	Shena;Kellum, Kim	el.com>	Shena;Kellum, Kim
100	7410710202000		Ollotti, Tronk Troudot	may be assa in magazion.	772072022 10:01 7411	1 mineged & communical	Wolda, Gason	Grieria, remain, rum	onsom:	onona, ronam, ram
				Attachment to email exchange between						
				AHCA Assistant Deputy Secretary for						
			Attorney-	Medicaid and counsel concerning						
164	AHCA0232370	Pdf	Client;Work-Product	research that may be used in litigation.						
				Attachment to email exchange between				1		
				AHCA Assistant Deputy Secretary for				1		
1	*****	5.4	Attorney-	Medicaid and counsel concerning				1		
165	AHCA0232381	Pdf	Client;Work-Product	research that may be used in litigation.				1		
				Email exchange between AHCA		DE DOMESCED *		1		
				Program Administrator and counsel		RE: PRIVILEGED & CONFIDENTIAL - ATTORNEY		1		
166	AHCA0242768	Pdf	Attorney-Client	concerning written comments on Proposed Rule 59G-1.050.	8/1/2022 9:13 AM	WORK PRODUCT	Giering, Cole	Gary V. Perko;Weida, Jason	Gary V. Perko	Weida, Jason
100	AHCA0242700	Fui	Attorney-Client	Froposed Rule 39G-1.030.	0/1/2022 9.13 AW	WORK FRODUCT	Glerring, Cole	Gary V. Ferko, Weida, Jason	Galy V. Felko	Welda, Jason
				Attachment to email exchange between						
				AHCA Program Administrator and		Comment: Proposal Amending				
				counsel concerning written comments		Rule 59G-1:050, General		MEDICAID RULE	MEDICAID RULE	
167	AHCA0242769	Pdf	Attorney-Client	on Proposed Rule 59G-1.050.	7/9/2022 3:18 PM	Medicaid Policy	Jon Harris Maurer	COMMENTS	COMMENTS	
			,			,				
				Attachment to email exchange between						
				AHCA Program Administrator and						
				counsel concerning written comments						
168	AHCA0242770	Pdf	Attorney-Client	on Proposed Rule 59G-1.050.						
									""George"","" Tracy;"	
								""George"","" Tracy;"	"Tamayo"",""	
				Email exchange between AHCA Public				"Tamayo"",""	Josefina; <josefina.tamayo< th=""><th></th></josefina.tamayo<>	
				Records Office and General Counsel's		040040		Josefina; <josefina.tamayo@< th=""><th>@ahca.myflorida.com&gt;;<tra< th=""><th></th></tra<></th></josefina.tamayo@<>	@ahca.myflorida.com>; <tra< th=""><th></th></tra<>	
169	AHCA0243143	Pdf	Attorney-Client	Office re: draft response to records request.	8/1/2022 1:40 PM	349948 public records request review	Gavins, Alexandra	ahca.myflorida.com>; <tracy.g eorge@ahca.myflorida.com&gt;</tracy.g 	cy.George@ahca.myflorida.c om>	
109	AFICA0243143	Fui	Attorney-Cilent	Attachment to email exchange between	0/1/2022 1.40 FW	review	Gavillo, Alexandra	eorge@arica.myriorida.com>	OIII>	
				AHCA Public Records Office and						
				General Counsel's Office re: draft						
170	AHCA0243144	Pdf	Attorney-Client	response to records request.				1		
H		wr	.,	,				""Grantham"","" Shena;"		
								"Kellum"",""	""Grantham"","" Shena;"	
								Kim; <kim.kellum@ahca.myflo< th=""><th>"Kellum"",""</th><th></th></kim.kellum@ahca.myflo<>	"Kellum"",""	
1				Email exchange between AHCA General		FW: Adoption Packet for 59G-		rida.com>; <shena.grantham< th=""><th>Kim;<kim.kellum@ahca.myfl< th=""><th></th></kim.kellum@ahca.myfl<></th></shena.grantham<>	Kim; <kim.kellum@ahca.myfl< th=""><th></th></kim.kellum@ahca.myfl<>	
			Attorney-	Counsel's Office counsel re: adoption		1.050 [PRIVILEGED &		@ahca.myflorida.com>;Sheer	orida.com>; <shena.grantha< th=""><th></th></shena.grantha<>	
171	AHCA0243300	Pdf	Client;Work-Product	packet for Rule 59G-1.050.	8/1/2022 2:02 PM	CONFIDENTIAL]	Tamayo, Josefina	an, Andrew	m@ahca.myflorida.com>	Sheeran, Andrew
								""Grantham"","" Shena;"	""Grantham"","" Shena;"	
				Email exchange between AHCA General				"Tamayo"","" Josefina; <josefina.tamayo@< th=""><th>"Tamayo"","" Josefina;<josefina.tamayo< th=""><th></th></josefina.tamayo<></th></josefina.tamayo@<>	"Tamayo"","" Josefina; <josefina.tamayo< th=""><th></th></josefina.tamayo<>	
				Counsel's Office counsel re: legal inquiry				ahca.myflorida.com>; <shena.< th=""><th>@ahca.myflorida.com&gt;;<she< th=""><th></th></she<></th></shena.<>	@ahca.myflorida.com>; <she< th=""><th></th></she<>	
				concerning public records request		FW: 349948 public records		Grantham@ahca.myflorida.co	ma.Grantham@ahca.myflorid	
172	AHCA0243332	Pdf	Attorney-Client	response.	8/1/2022 2:20 PM	request review	George, Tracy	m>	a.com>	
	. 11.07.0240002	. ui	,o.r.oy-Onorit	10000100.	-/ ./ LOLL 2.20 1 WI	1040001104104	Coorgo, Huoy	1.05	G. SOITE	
				Attachment to email exchange between				1		
				AHCA General Counsel's Office counsel				1		
				re: legal inquiry concerning public				1		
173	AHCA0243333	Pdf	Attorney-Client	records request response.				1		
								""Helton"","" Joseph;"	""Helton"","" Joseph;"	
								"Tamayo"","" Josefina;"	"Tamayo"","" Josefina;"	
1								"Grantham"","" Shena;"	"Grantham"","" Shena;"	
								"Kellum"","" Kim;"	"Kellum"","" Kim;"	
				Email exchange between AHCA General				"Hoeler"","";Thomas; <thomas.< th=""><th>"Hoeler"","";Thomas;<thoma< th=""><th></th></thoma<></th></thomas.<>	"Hoeler"","";Thomas; <thoma< th=""><th></th></thoma<>	
				Counsel's Office and AHCA Public				Hoeler@ahca.myflorida.com>;	s.Hoeler@ahca.myflorida.co	
[,_,]	***********	5.4		Records Office re: legal review of public	0/0/0000 0 0 4			<josefina.tamayo@ahca.myfl< th=""><th></th><th></th></josefina.tamayo@ahca.myfl<>		
174	AHCA0243949	Pdf	Attorney-Client	records request responses.	8/2/2022 9:34 AM	FW: Public Records Daily Log	George, Tracy	orida.com>	.myflorida.com>	

## Case 4:22-cv-00325-RH-MAF Document 109-4 Filed 03/02/23 Page 12 of 19

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	A	В		Email exchange between AHCA General		F	G	П	'	3
				Counsel's Office and AHCA Public				""George"",""	""George"",""	
				Records Office re: legal review of public				Tracy; <tracy.george@ahca.< td=""><td>Tracy;<tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<></td></tracy.george@ahca.<>	Tracy; <tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<>	
175	AHCA0243956	Pdf	Attorney-Client	records request responses.	8/2/2022 9:37 AM	RE: Public Records Daily Log	Gavins, Alexandra	myflorida.com>	myflorida.com>	
				Email exchange between AHCA General						
				Counsel's Office and AHCA Public				""Gavins"","" Alexandra: <alexandra.gavins< th=""><th>""Gavins"","" Alexandra:<alexandra.gavin< th=""><th></th></alexandra.gavin<></th></alexandra.gavins<>	""Gavins"","" Alexandra: <alexandra.gavin< th=""><th></th></alexandra.gavin<>	
176	AHCA0243964	Pdf	Attorney-Client	Records Office re: legal review of public records request responses.	8/2/2022 10:03 AM	RE: Public Records Daily Log	George, Tracy	@ahca.myflorida.com>	s@ahca.myflorida.com>	
176	AFICA0243904	rui	Attorney-Client	records request responses.	0/2/2022 10.03 AIVI	RE. Fublic Recolds Daily Log	George, macy	@arica.myllorida.com>	s@arica.myllorida.com>	
				Email between counsel and AHCA				""Weida"",""	""Weida"",""	
				Assistant Deputy Secretary for Medicaid				Jason;Mohammad O.	Jason;Mohammad O.	
			Attorney-	regarding legal analysis and expert				Jazil; <jason.weida@ahca.my< td=""><td>Jazil;<jason.weida@ahca.m< td=""><td></td></jason.weida@ahca.m<></td></jason.weida@ahca.my<>	Jazil; <jason.weida@ahca.m< td=""><td></td></jason.weida@ahca.m<>	
177	AHCA0243972	Pdf	Client;Work-Product		8/2/2022 10:15 AM	Experts in Arizona case	Gary V. Perko	florida.com>	yflorida.com>	
				Attachment to email exchange between						
				counsel and AHCA Assistant Deputy						
			Attomosy	Secretary for Medicaid regarding legal						
178	AHCA0243973	Pdf	Attorney- Client;Work-Product	analysis and expert testimony in anticipation of litigation.						
170	71110710240070	i ui	Olicht, FFORCT Todder	Attachment to email exchange between						
				counsel and AHCA Assistant Deputy						
				Secretary for Medicaid regarding legal				1		
1			Attorney-	analysis and expert testimony in				1		
179	AHCA0243991	Pdf	Client;Work-Product					ļ		
				Email exchange between counsel and				1		
1				AHCA Assistant Deputy Secretary for				1		
			Attorney-	Medicaid regarding legal analysis and expert testimony in anticipation of				Gary V. Perko;Mohammad O.	Gary V. Perko;Mohammad	
180	AHCA0244061	Pdf	Client;Work-Product	litigation.	8/2/2022 10:19 AM	RE: Experts in Arizona case	Weida, Jason	Jazil	O. Jazil	
100	7410740211001		Onone, Work Froduct	Email exchange between counsel and	0/2/2022 10:10 / 1111	The Exports III / II Esta sace	rroida, dadoii	our.	O. Gazii	
1				AHCA Assistant Deputy Secretary for				""Weida"",""	""Weida"",""	
				Medicaid regarding legal analysis and				Jason;Mohammad O.	Jason;Mohammad O.	
			Attorney-	expert testimony in anticipation of				Jazil; <jason.weida@ahca.my< td=""><td></td><td></td></jason.weida@ahca.my<>		
181	AHCA0244063	Pdf	Client;Work-Product		8/2/2022 10:23 AM	RE: Experts in Arizona case	Gary V. Perko	florida.com>	yflorida.com>	
				Email exchange between AHCA General				""C a a r g a "" ""	""Coormo"" ""	
				Counsel's Office and AHCA Public Records Office re: legal review of public				""George"","" Tracy; <tracy.george@ahca.< td=""><td>""George"","" Tracy;<tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<></td></tracy.george@ahca.<>	""George"","" Tracy; <tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<>	
182	AHCA0244065	Pdf	Attorney-Client	records request responses.	8/2/2022 10:39 AM	RE: Public Records Daily Log	Gavins, Alexandra	myflorida.com>	myflorida.com>	
102	ALICAUZ44003	i ui	Attorney-Client	Email between counsel and AHCA	0/2/2022 10.39 AW	TCE. 1 ublic records bally Edg	Gavins, Alexandra	""Weida"",""	""Weida"",""	
				Assistant Deputy Secretary for Medicaid				Jason;Mohammad O.	Jason;Mohammad O.	
			Attorney-	regarding analysis of caselaw in				Jazil; <jason.weida@ahca.my< td=""><td>Jazil;<jason.weida@ahca.m< td=""><td></td></jason.weida@ahca.m<></td></jason.weida@ahca.my<>	Jazil; <jason.weida@ahca.m< td=""><td></td></jason.weida@ahca.m<>	
183	AHCA0244073	Pdf	Client;Work-Product		8/2/2022 10:48 AM	UK Decision	Gary V. Perko	florida.com>	yflorida.com>	
				Attachment to email between counsel						
			Attorney-	and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis in						
184	AHCA0244074	Pdf	Client;Work-Product	anticipation of litigation.						
									""George"","" Tracy;"	
								""George"","" Tracy;"	"Tamayo"",""	
				Email exchange between AHCA General				"Tamayo"",""	Josefina; <josefina.tamayo< td=""><td></td></josefina.tamayo<>	
				Counsel's Office and AHCA Public				Josefina; <josefina.tamayo@< td=""><td>@ahca.myflorida.com&gt;;<tra< td=""><td></td></tra<></td></josefina.tamayo@<>	@ahca.myflorida.com>; <tra< td=""><td></td></tra<>	
405		5.16		Records Office re: legal review of public	0/0/0000 44 00 444	5.4. 5 . 1. 5 .		ahca.myflorida.com>; <tracy.g< td=""><td>cy.George@ahca.myflorida.c</td><td></td></tracy.g<>	cy.George@ahca.myflorida.c	
185	AHCA0244113	Pdf	Attorney-Client	records request responses.	8/2/2022 11:00 AM	FW: Public Records Daily Log	Gavins, Alexandra	eorge@ahca.myflorida.com>	om>	
				Email between counsel and AHCA				1		
1				Assistant Deputy Secretary for Medicaid				Gary V. Perko;" "Weida"",""	Gary V. Perko;" "Weida"",""	
			Attorney-	regarding legal analysis and expert				Jason; <jason.weida@ahca.m< td=""><td>Jason;<jason.weida@ahca.< td=""><td></td></jason.weida@ahca.<></td></jason.weida@ahca.m<>	Jason; <jason.weida@ahca.< td=""><td></td></jason.weida@ahca.<>	
186	AHCA0244121	Pdf	Client;Work-Product		8/2/2022 11:00 AM	RE: UK Decision	Mohammad O. Jazil	yflorida.com>	myflorida.com>	
П										
				Email between counsel and AHCA				Mohammad O. Jazil;"	Mohammad O. Jazil;"	
			Attornov	Assistant Deputy Secretary for Medicaid				"Weida"",""	"Weida"",""	
187	AHCA0244123	Pdf	Attorney- Client;Work-Product	regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 11:25 AM	RE: UK Decision	Gary V. Perko	Jason; <jason.weida@ahca.m yflorida.com&gt;</jason.weida@ahca.m 	Jason; <jason.weida@anca. myflorida.com&gt;</jason.weida@anca. 	
107	ALIONO244 123	i ui	Olietit, VVOIR-FTODUCI	cosmicing in anticipation of itigation.	UIZIZUZZ II.ZU AIVI	IL. ON DECISION	Gary V. Feiku	ynonua.com/	mynonua.com/	
				Email exchange between AHCA General				""George"",""	""George"",""	
				Counsel's Office counsel re: legal review				Tracy; <tracy.george@ahca.< td=""><td>Tracy;<tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<></td></tracy.george@ahca.<>	Tracy; <tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<>	
188	AHCA0244125	Pdf	Attorney-Client	of public records request responses.	8/2/2022 11:28 AM	FW: Public Records Daily Log	Tamayo, Josefina	myflorida.com>	myflorida.com>	
ıΤ				Email exchange between AHCA General			<u> </u>			
				Counsel's Office and AHCA Public				Tamana las director of	Tamana las-fire-Cont	
100	AUCA0244420	Dat	Attorney Client	Records Office re: legal review of public records request responses.	0/2/2022 42:40 5*4	DE: Dublio Bosseda Dailu I	Coorge Trans	Tamayo, Josefina; Gavins,	Tamayo, Josefina; Gavins,	
189	AHCA0244139	Pdf	Attorney-Client	Email exchange between counsel and	8/2/2022 12:18 PM	RE: Public Records Daily Log	George, Tracy	Alexandra	Alexandra	
				AHCA Assistant Deputy Secretary for				""Weida"".""	""Weida"".""	
				Medicaid regarding legal analysis and				Jason;Mohammad O.	Jason;Mohammad O.	
1			Attorney-	expert testimony in anticipation of				Jazil; <jason.weida@ahca.my< td=""><td>Jazil;<jason.weida@ahca.m< td=""><td></td></jason.weida@ahca.m<></td></jason.weida@ahca.my<>	Jazil; <jason.weida@ahca.m< td=""><td></td></jason.weida@ahca.m<>	
190	AHCA0244147	Pdf	Client;Work-Product	litigation.	8/2/2022 12:27 PM	RE: Experts in Arizona case	Gary V. Perko	florida.com>	yflorida.com>	

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	Α	В	С	D	Е	F	G	Т	l ı	J
				Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public				""George"", "" Tracy;" "Tamayo"", "" Josefina; < Josefina. Tamayo@ ahca.myflorida.com; < Tracy. G	""George"","" Tracy;" "Tamayo"","" Josefina; <josefina.tamayo @ahca.myflorida.com="">;<tra cy.george@ahca.myflorida.c<="" td=""><td></td></tra></josefina.tamayo>	
191	AHCA0244159	Pdf	Attorney-Client	records request responses.	8/2/2022 1:22 PM	RE: Public Records Daily Log	Gavins, Alexandra	eorge@ahca.myflorida.com>	om>	
192	AHCA0244168	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/2/2022 2:47 PM	RE: Public Records Daily Log	Gavins, Alexandra	""George"","" Tracy;" "Tamayo"","" Josefina; <josefina.tamayo@ ahca.myflorida.com="">;<tracy.g eorge@ahca.myflorida.com=""></tracy.g></josefina.tamayo@>	""George"","" Tracy;" "Tamayo"","" Josefina; <josefina.tamayo @ahca.myflorida.com="">;<tra cy.george@ahca.myflorida.c<="" th=""><th></th></tra></josefina.tamayo>	
				Email exchange between AHCA General Counsel's Office and AHCA Public		, ,				
193	AHCA0244177	Pdf	Attorney-Client	Records Office re: legal review of public records request responses.	8/2/2022 2:52 PM	RE: Public Records Daily Log	George, Tracy	Gavins, Alexandra; Tamayo, Josefina	Gavins, Alexandra; Tamayo, Josefina	
100	7410710244177	i ui	7 ttorriey-Olient	Email exchange between AHCA General	O/Z/ZOZZ Z.OZ I W	TKE. I ubile recooled bully Eog	occige, macy			
194	AHCA0244186	Pdf	Attorney-Client	Counsel's Office and AHCA Public Records Office re: pending public records requests.	8/2/2022 4:09 PM	Information Needed in the Morning	George, Tracy	""Gavins"","" Alexandra; <alexandra.gavins @ahca.myflorida.com=""></alexandra.gavins>	""Gavins"","" Alexandra; <alexandra.gavin s@ahca.myflorida.com=""></alexandra.gavin>	
195	AHCA0244197	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: pending public records requests.	8/3/2022 7:29 AM	RE: Information Needed in the Morning	Gavins, Alexandra	""George"","" Tracy; <tracy.george@ahca. myflorida.com=""></tracy.george@ahca.>	""George"","" Tracy; <tracy.george@ahca. myflorida.com=""></tracy.george@ahca.>	
				Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: pending public		RE: Information Needed in the		""Gavins"","" Alexandra; <alexandra.gavins< td=""><td>""Gavins"","" Alexandra;<alexandra.gavin< td=""><td></td></alexandra.gavin<></td></alexandra.gavins<>	""Gavins"","" Alexandra; <alexandra.gavin< td=""><td></td></alexandra.gavin<>	
196	AHCA0244198	Pdf	Attorney-Client	records requests. Email exchange between AHCA General	8/3/2022 8:24 AM	Morning Pending Public Records	George, Tracy	@ahca.myflorida.com> ""Tamayo"",""	s@ahca.myflorida.com> ""Tamayo"",""	
197	AHCA0244200	Pdf	Attorney-Client	Counsel's Office counsel re: pending public records requests.  Email exchange between AHCA General	8/3/2022 8:33 AM	Requests related to proposed rule 59G-1.050 Fwd: Pending Public Records	George, Tracy	Josefina; <josefina.tamayo@ ahca.myflorida.com&gt;</josefina.tamayo@ 	Josefina; <josefina.tamayo @ahca.myflorida.com=""> ""Sheeran"",""</josefina.tamayo>	
198	AHCA0244205	Pdf	Attorney-Client	Counsel's Office counsel re: pending public records requests.	8/3/2022 8:34 AM	Requests related to proposed rule 59G-1.050	Tamayo, Josefina	Andrew; <andrew.sheeran@a hca.myflorida.com&gt;</andrew.sheeran@a 	Andrew; <andrew.sheeran@ ahca.myflorida.com&gt;</andrew.sheeran@ 	
199	AHCA0244210	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/3/2022 9:01 AM	RE: Public Records Daily Log	Gavins, Alexandra	""George"","" Tracy; <tracy.george@ahca. myflorida.com&gt;</tracy.george@ahca. 	""George"","" Tracy; <tracy.george@ahca. myflorida.com=""></tracy.george@ahca.>	
200	AHCA0244218	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/3/2022 9:04 AM	RE: Public Records Daily Log	George, Tracy	""Gavins"","" Alexandra; <alexandra.gavins @ahca.myflorida.com="">;Tamay o, Josefina;Hoeler, Thomas</alexandra.gavins>	""Gavins"","" Alexandra; <alexandra.gavin s@ahca.myflorida.com&gt;</alexandra.gavin 	Tamayo, Josefina;Hoeler, Thomas
201	AHCA0244226	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: legal review of public records request responses.	8/3/2022 9:47 AM	RE: Public Records Daily Log	Hoeler, Thomas	""George"","" Tracy;" "Gavins"","" Alexandra; <alexandra.gavins @ahca.myflorida.com="">;<tracy .george@ahca.myflorida.com<="" td=""><td>""George"","" Tracy;" "Gavins"","" Alexandra;<alexandra.gavin s@ahca.myflorida.com="">;<tr acy.george@ahca.myflorida.="" com=""></tr></alexandra.gavin></td><td></td></tracy></alexandra.gavins>	""George"","" Tracy;" "Gavins"","" Alexandra; <alexandra.gavin s@ahca.myflorida.com="">;<tr acy.george@ahca.myflorida.="" com=""></tr></alexandra.gavin>	
202	AHCA0244234	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: pending public records requests.	8/3/2022 10:03 AM	FW: Pending Public Records Requests related to proposed rule 59G-1.050	George, Tracy	""Tamayo"","" Josefina;" "Sheeran"","" Andrew; <josefina.tamayo@a hca.myflorida.com="">;<andrew. sheeran@ahca.myflorida.com<="" td=""><td>""Tamayo"","" Josefina;" "Sheeran"","" Andrew; <li>Josefina.Tamayo@ ahca.myflorida.com&gt;;<andre om="" w.sheeran@ahca.myflorida.c=""></andre></li> </td><td></td></andrew.></josefina.tamayo@a>	""Tamayo"","" Josefina;" "Sheeran"","" Andrew; <li>Josefina.Tamayo@ ahca.myflorida.com&gt;;<andre om="" w.sheeran@ahca.myflorida.c=""></andre></li>	
202	AHOAU244204	T UI	Automey-client	Email exchange between AHCA General Counsel's Office counsel re: legal review	0/3/2022 10.03 AW	Tule 390-1.000	George, Tracy	""Hoeler"","" Thomas; <thomas.hoeler@ah< th=""><th>""Hoeler"","" Thomas;<thomas.hoeler@a< th=""><th></th></thomas.hoeler@a<></th></thomas.hoeler@ah<>	""Hoeler"","" Thomas; <thomas.hoeler@a< th=""><th></th></thomas.hoeler@a<>	
203	AHCA0244239	Pdf	Attorney-Client	of public records request responses.	8/3/2022 10:23 AM	RE: Public Records Daily Log	George, Tracy	ca.myflorida.com>	hca.myflorida.com> ""Weida"","" Jason;"	
204	AHCA0244515	Pdf	Attorney- Client;Work-Product	Email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid regarding DOH's Petition to Initiate Rulemaking and regarding expert.	8/3/2022 3:32 PM	RE: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Tamayo, Josefina	""Weida"","" Jason;" "Sheeran"","" Andrew; <jason.weida@ahca. myflorida.com="">;<andrew.she eran@ahca.myflorida.com=""></andrew.she></jason.weida@ahca.>	"Sheeran"","" Andrew; <jason.weida@ahc a.myflorida.com="">;<andrew.s heeran@ahca.myflorida.com=""></andrew.s></jason.weida@ahc>	
205	AHCA0244526	Pdf	Attorney- Client;Work-Product	Email exchange between AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid regarding DOH's Petition to Initiate Rulemaking and regarding expert.	8/3/2022 3:42 PM	RE: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Weida, Jason	""Tamayo"","" Josefina;" "Sheeran"","" Andrew; <josefina.tamayo@a hca.myflorida.com="">;<andrew. sheeran@ahca.myflorida.com=""></andrew.></josefina.tamayo@a>	""Tamayo"","" Josefina;" "Sheeran"","" Andrew; Josefina. Tamayo@ ahca.myflorida.com>; <andre td="" w.sheeran@ahca.myflorida.c<=""><td></td></andre>	

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214 AHCA0245128 Pdf Altomey-Client Per legal review of public records request responses. 8/4/2022 1:26 PM Morning George, Tracy											
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217 AHCA0245168 Pdf Client;Work-Product litigation. 8/4/2022 3:10 PM WORK PRODUCT Tamayo, Josefina um@ahca.myflorida.com> ellum@ahca.myflorida.com>				Attorney-							
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218 AHCA0245169 Pdf Client;Work-Product Client;Work-Product Attorney-Office with counsel's legal analysis in anticipation of litigation.  Email from AHCA General Counsel's Office to General Counsel'				,						G	
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219  AHCAU245200   Pdt   Client;Work-Product  anticipation of litigation.   8/4/2022 3:12 PM   Case law Update   Tamayo, Josefina   <john.wilson@fhealth.gov>   <john.wilson@fhealth.gov>  </john.wilson@fhealth.gov></john.wilson@fhealth.gov>											
	219	AHCA0245200	Pdf	Client;Work-Product	anticipation of litigation.	8/4/2022 3:12 PM	Case law Update	Famayo, Josefina	<john.wilson@flhealth.gov></john.wilson@flhealth.gov>	<pre><john.wilson@flhealth.gov></john.wilson@flhealth.gov></pre>	

# Case 4:22-cv-00325-RH-MAF Document 109-4 Filed 03/02/23 Page 15 of 19

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				Attachment to email from AHCA General						
				Counsel's Office to General Counsel for						
220	AHCA0245201	Pdf	Attorney- Client;Work-Product	Florida Department of Health re: caselaw in anticipation of litigation.						
220	71110710210201			Email from AHCA General Counsel's				""Furino"",""	""Furino"",""	
221	AHCA0245231	Pdf	Attorney- Client;Work-Product	Office to EOG counsel re: caselaw in anticipation of litigation.	8/4/2022 3:13 PM	Case Law Update	Tamayo, Josefina	Maureen; <maureen.furino@ed g.myflorida.com&gt;</maureen.furino@ed 	Maureen; <maureen.furino@e og.myflorida.com&gt;</maureen.furino@e 	
221	AI 10A0243231	i ui	Client, WOIK-I TOUGH	anticipation of nugation.	0/4/2022 3.13 T W	Case Law Opuate	ramayo, soseima	g.mynonda.com>	og.mynorida.com>	
			Attorney-	Attachment to email from AHCA General Counsel's Office to EOG counsel re:						
222	AHCA0245232	Pdf	Client;Work-Product	caselaw in anticipation of litigation.						
				Email exchange between AHCA General						
				Counsel's Office and Public Records Office re: legal review of public records				""George"","" Tracy; <tracy.george@ahca.< td=""><td>""George"","" Tracy;<tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<></td></tracy.george@ahca.<>	""George"","" Tracy; <tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<>	
223	AHCA0246875	Pdf	Attorney-Client	request responses.	8/9/2022 8:41 AM	RE: Public Records Daily Log	Gavins, Alexandra	myflorida.com>	myflorida.com>	
				Email exchange between AHCA General Counsel's Office and Public Records						
				Office re: legal review of public records				Gavins, Alexandra; Hoeler,	Gavins, Alexandra; Hoeler,	
224	AHCA0246883	Pdf	Attorney-Client	request responses.  Attachment to email regarding status	8/9/2022 9:26 AM	RE: Public Records Daily Log	George, Tracy	Thomas;Tamayo, Josefina	Thomas;Tamayo, Josefina	
				updates of public records and media						
225	AHCA0246938	Excel	Attorney-Client	requests; request tracker.						
				Attachment to email regarding status updates of public records and media						
226	AHCA0246939	Excel	Attorney-Client	requests; request tracker.						
				Attachment to email regarding status updates of public records and media						
227	AHCA0246940	Excel	Attorney-Client	requests; request tracker.						
				Attachment to email regarding status updates of public records and media						
228	AHCA0246941	Excel	Attorney-Client	requests; request tracker.						
				Attachment to email regarding status						
229	AHCA0246942	Excel	Attorney-Client	updates of public records and media requests; request tracker.						
220										
				Email exchange between AHCA General				""Wallace"","" Thomas J.; <thomas.wallace@ahca.m< td=""><td></td><td></td></thomas.wallace@ahca.m<>		
				Counsel's Office, Public Records Office,				yflorida.com>;Tamayo,	""Wallace"","" Thomas	Tamayo, Josefina;Kellum,
000	ALIO A 00 40070	Pdf	A44 Oli4	and Deputy Secretary for Medicaid re: public records request.	0/0/0000 44.04 484	Public Records Request	O T	Josefina; Kellum, Kim; Sheeran		Kim;Sheeran,
230	AHCA0246970	Par	Attorney-Client	Email exchange between Medicaid Data	8/9/2022 11:34 AM	Public Records Request	George, Tracy	Andrew;Weida, Jason	myflorida.com>	Andrew;Weida, Jason
				Analytics and Deputy Secretary for						
				Medicaid re: questions from General Counsel's Office about public records				""Barry"","" Joycee; <joycee.barry@ahca.< td=""><td>""Barry"","" Joycee;<joycee.barry@ahca< td=""><td></td></joycee.barry@ahca<></td></joycee.barry@ahca.<>	""Barry"","" Joycee; <joycee.barry@ahca< td=""><td></td></joycee.barry@ahca<>	
231	AHCA0247295	Pdf	Attorney-Client	request.	8/10/2022 11:52 AM	FW: Public Records Request	Wallace, Thomas J.	myflorida.com>	.myflorida.com>	
				Attachment to email exchange between Medicaid Data Analytics and Deputy						
				Secretary for Medicaid re: questions						
	****	5.1		from General Counsel's Office about	7/00/0000 40 00 444	Pediatric Gender Dysphoria		PublicRecordsReq;Haller,Mich	5.17.5	
232	AHCA0247296	Pdf	Attorney-Client	public records request. Email exchange between AHCA General	7/30/2022 12:08 AM	Treated in Florida	Haller,Michael James	ael James	PublicRecordsReq	Haller,Michael James
				Counsel's Office and Public Records				""George"",""	""George"",""	
233	AHCA0247297	Pdf	Attorney-Client	Office re: legal review of public records request responses.	8/10/2022 12:33 PM	FW: Public Records Daily Log	Gavins, Alexandra	Tracy; <tracy.george@ahca. myflorida.com&gt;</tracy.george@ahca. 	Tracy; <tracy.george@ahca. myflorida.com&gt;</tracy.george@ahca. 	
200	107 102 17 237		. atomoj onom	Email exchange between Medicaid Data		abiio riccordo Bally Log		mynoriaa.com	mynoriaa.com	
				Analytics and Deputy Secretary for Medicaid re: questions from General				""Creel"",""	""Creel"",""	
				Counsel's Office about public records				Victoria; <victoria.creel@ahca< td=""><td></td><td></td></victoria.creel@ahca<>		
234	AHCA0247320	Pdf	Attorney-Client	request.	8/10/2022 12:47 PM	Fwd: Public Records Request	Barry, Joycee	myflorida.com>	a.myflorida.com>	
				Attachment to email exchange between Medicaid Data Analytics and Deputy						
				Secretary for Medicaid re: questions						
235	AHCA0247321	Pdf	Attorney-Client	from General Counsel's Office about public records request.	7/30/2022 12:08 AM	Pediatric Gender Dysphoria Treated in Florida	Haller, Michael James	PublicRecordsReq;Haller,Mich ael James	PublicRecordsReq	Haller,Michael James
200	, 10/102-1/02 1	1 41	, morney-onem	Email exchange between AHCA General	7,0072022 12.00 AW	Trouted III I Iorida	. iaor,iviloridor darries		·	. iaor, who had our les
				Counsel's Office and Public Records				""George"",""	""George"",""	
236	AHCA0247336	Pdf	Attorney-Client	Office re: legal review of public records request responses.	8/10/2022 1:59 PM	350062 review	Gavins, Alexandra	Tracy; <tracy.george@ahca. myflorida.com&gt;</tracy.george@ahca. 	Tracy; <tracy.george@ahca. myflorida.com&gt;</tracy.george@ahca. 	
				Attachment to email exchange between AHCA General Counsel's Office and						
				Public Records Office re: legal review of						
237	AHCA0247337	Pdf	Attorney-Client	public records request responses.		l			l	

# Case 4:22-cv-00325-RH-MAF Document 109-4 Filed 03/02/23 Page 16 of 19

	Α	В	С	I n	F	F	G	н	1	J
								""Tamayo"","" Josefina;"	""Tamayo"","" Josefina;"	· ·
								"Juarez"","" Brock;"	"Juarez"","" Brock;"	
				Email exchange between AHCA General				"Gavins"","" Alexandra; <brock.juarez@ah< td=""><td>"Gavins"","" Alexandra;<brock.juarez@a< td=""><td></td></brock.juarez@a<></td></brock.juarez@ah<>	"Gavins"","" Alexandra; <brock.juarez@a< td=""><td></td></brock.juarez@a<>	
				Counsel's Office and Public Records				ca.myflorida.com>; <alexandra< td=""><td></td><td></td></alexandra<>		
				Office re: legal review of public records		Response to Public Records		.Gavins@ahca.myflorida.com	dra.Gavins@ahca.myflorida.	
238	AHCA0247430	Pdf	Attorney-Client	request responses.	8/10/2022 2:18 PM	Request - CorrFlow #350062	George, Tracy	>	com>	
				Attachment to email exchange between						
				AHCA General Counsel's Office and						
				Public Records Office re: legal review of						
239	AHCA0247432	Pdf	Attorney-Client	public records request responses.  Email exchange between AHCA General						
				Counsel's Office and Public Records				""Colson"",""	""Colson"",""	
				Office re: legal review of public records		FW: Response to Public Records		Max; <max.colson@ahca.myfl< td=""><td>Max;<max.colson@ahca.myf< td=""><td></td></max.colson@ahca.myf<></td></max.colson@ahca.myfl<>	Max; <max.colson@ahca.myf< td=""><td></td></max.colson@ahca.myf<>	
240	AHCA0247539	Pdf	Attorney-Client	request responses.	8/10/2022 3:08 PM	Request - CorrFlow #350062	Gavins, Alexandra	orida.com>	lorida.com>	
				Attachment to email exchange between						
				AHCA General Counsel's Office and						
				Public Records Office re: legal review of						
241	AHCA0247541	Pdf	Attorney-Client	public records request responses.						
			1	Email exchange between AHCA General Counsel's Office and Public Records				""George"",""	""George"",""	
			1	Office re: pending public records				Tracy; <tracy.george@ahca.< td=""><td>Tracy;<tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<></td></tracy.george@ahca.<>	Tracy; <tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<>	
242	AHCA0247742	Pdf	Attorney-Client	requests.	8/10/2022 4:55 PM	records requests	Gavins, Alexandra	myflorida.com>	myflorida.com>	
				Attachment to email exchange between						
				AHCA General Counsel's Office and Public Records Office re: pending public						
243	AHCA0247743	Excel	Attorney-Client	records requests.						
	-		, , , , ,	Email exchange between AHCA General						
				Counsel's Office and Public Records				""George"",""	""George"",""	
244	AHCA0247749	Pdf	Attorney-Client	Office re: legal review of public records request responses.	8/11/2022 9:34 AM	FW: Public Records Daily Log	Gavins, Alexandra	Tracy; <tracy.george@ahca. myflorida.com&gt;</tracy.george@ahca. 	Tracy; <tracy.george@ahca. myflorida.com&gt;</tracy.george@ahca. 	
2-7-7	741070211710		7 Montey Chark	Email exchange between AHCA General	0/11/2022 0:01/441	Titti usiio Heeerae Baily Leg	Gavino, 7 aoxanara	mynonad.com	mynoriaa.com	
				Counsel's Office and Public Records						
245	ALICA0247760	Pdf	Attornov Client	Office re: legal review of public records	8/11/2022 9:45 AM	FM/s Dublic December Deiby Los	Cassas Trass	Gavins, Alexandra; Hoeler,	Gavins, Alexandra; Hoeler,	
245	AHCA0247760	Pui	Attorney-Client	request responses.	6/11/2022 9.45 AW	FW: Public Records Daily Log	George, Tracy	Thomas ""George"","" Tracy;"	Thomas ""George"","" Tracy;"	
								"Gavins"",""	"Gavins"",""	
				Email exchange between AHCA General				Alexandra; <alexandra.gavins< td=""><td></td><td></td></alexandra.gavins<>		
				Counsel's Office and Public Records Office re: legal review of public records				@ahca.myflorida.com>; <tracy .George@ahca.myflorida.com</tracy 		
246	AHCA0247769	Pdf	Attorney-Client	request responses.	8/11/2022 10:17 AM	RE: Public Records Daily Log	Hoeler, Thomas	> Seorge@anca.mynonua.com	com>	
				Email exchange between AHCA General						
				Counsel's Office and Public Records				""Belmont"","" Catherine; <catherine.belmont< td=""><td>""Belmont"","" Catherine;<catherine.belmo< td=""><td></td></catherine.belmo<></td></catherine.belmont<>	""Belmont"","" Catherine; <catherine.belmo< td=""><td></td></catherine.belmo<>	
247	AHCA0247782	Pdf	Attorney-Client	Office re: pending public records requests.	8/11/2022 1:41 PM	FW: records requests	George, Tracy	@ahca.myflorida.com>	nt@ahca.myflorida.com>	
			7 Monthly Gillonia	Internal notes and tracker for Agency	O/TIVEOLE TITLE	1 W. Todorac Toquosis	Coorgo, macy	(garioum) nonautom	nice and any normal comme	
248	AHCA0247783	Excel	Attorney-Client	media responses.				HIII Z - 11 HII HII 1 Z "		
			1					""Kellum"","" Kim;" "Grantham"",""	""Kellum"","" Kim;"	
			ĺ					Shena; <kim.kellum@ahca.my< td=""><td>"Grantham"",""</td><td></td></kim.kellum@ahca.my<>	"Grantham"",""	
			1	Email between General Counsel's Office				florida.com>; <shena.grantha< td=""><td>Shena;<kim.kellum@ahca.< td=""><td></td></kim.kellum@ahca.<></td></shena.grantha<>	Shena; <kim.kellum@ahca.< td=""><td></td></kim.kellum@ahca.<>	
240	AHCA0259805	Pdf	Attorney-Client	regarding Senator Book's AHCA Rule Letter.	8/15/2022 10:35 AM	FW: Letter from Senate Minority Leader Book	Tamayo, Josefina	m@ahca.myflorida.com>;She eran, Andrew	myflorida.com>; <shena.gran tham@ahca.myflorida.com&gt;</shena.gran 	Shooron Androus
249	ATICAU259805	rai	Attorney-Client	Letter.  Attachment to email between General	0/13/2022 10:35 AM	Leauer Book	ramayo, Josefina	eran, Andrew	паншанса.myпопаа.com>	Sheeran, Andrew
			1	Counsel's Office regarding Senator						
250	AHCA0259806	Pdf	Attorney-Client	Book's AHCA Rule Letter.						
			1	Email between Chief of Staff and General Counsel regarding ADF's		FW: ADF Celebration of Promise to America's Parents (Privileged		""Tamayo"","" Josefina; <josefina.tamayo@< td=""><td>""Tamayo"","" Josefina;<josefina.tamayo< td=""><td></td></josefina.tamayo<></td></josefina.tamayo@<>	""Tamayo"","" Josefina; <josefina.tamayo< td=""><td></td></josefina.tamayo<>	
251	AHCA0260387	Pdf	Attorney-Client	request for interview.	8/15/2022 3:01 PM	& Confidential)	Weida, Jason	ahca.myflorida.com>	@ahca.myflorida.com>	
- ·				Email between Chief of Staff and		Re: ADF Celebration of Promise	,	""Weida"",""	""Weida"",""	
		D.:	l	General Counsel regarding ADF's	0/40/000= = == ==	to America's Parents (Privileged		Jason; <jason.weida@ahca.m< td=""><td></td><td></td></jason.weida@ahca.m<>		
252	AHCA0260443	Pdf	Attorney-Client	request for interview. Email between Chief of Staff and	8/16/2022 6:28 AM	& Confidential) Fwd: ADF Celebration of	Tamayo, Josefina	yflorida.com> ""Marstiller"",""	myflorida.com> ""Marstiller"",""	
			Attorney-	General Counsel regarding ADF's		Promise to America's Parents		Simone; <simone.marstiller@a< td=""><td></td><td></td></simone.marstiller@a<>		
253	AHCA0260446	Pdf	Client;Work-Product	request for interview.	8/16/2022 6:45 AM	(Privileged & Confidential)	Tamayo, Josefina	hca.myflorida.com>	ahca.myflorida.com>	
			1	Empil between ALICA Comment Co.		Funds ADE College 4	1	!!!Clamman - !!-!!!! !!!	III Clause and I I - i - III III	
			1	Email between AHCA General Counsel and EOG General Counsel's Office		Fwd: ADF Celebration of Promise to America's Parents		""Clemmons-Haire"","" Mary; <mary.haire@ahca.myfl< td=""><td>""Clemmons-Haire"","" Mary;<mary.haire@ahca.myf< td=""><td></td></mary.haire@ahca.myf<></td></mary.haire@ahca.myfl<>	""Clemmons-Haire"","" Mary; <mary.haire@ahca.myf< td=""><td></td></mary.haire@ahca.myf<>	
254	AHCA0260718	Pdf	Attorney-Client	regarding ADF's request for interview.	8/16/2022 7:49 AM	(Privileged & Confidential)	Tamayo, Josefina	orida.com>	lorida.com>	
			1	Email between AHCA General		RE: ADF Celebration of Promise		""Tamayo"",""	""Tamayo"",""	
055	411040000764	D-If	A# O!! :	Counsel's Office regarding ADF's	0/40/0000 0.07 ***	to America's Parents (Privileged	01	Josefina; <josefina.tamayo@< td=""><td></td><td></td></josefina.tamayo@<>		
255	AHCA0260721	Pdf	Attorney-Client	request for interview.	8/16/2022 8:07 AM	& Confidential)	Clemmons-Haire, Mary	ahca.myflorida.com>	@ahca.myflorida.com>	

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	Δ	В	С	D	E			Н	1	J
H	A	В	C	Email between AHCA General		Re: ADF Celebration of Promise	G	""Clemmons-Haire"",""	""Clemmons-Haire"",""	J
				Counsel's Office regarding ADF's		to America's Parents (Privileged		Mary; <mary.haire@ahca.myfl< td=""><td></td><td></td></mary.haire@ahca.myfl<>		
256	AHCA0260724	Pdf	Attorney-Client	request for interview.	8/16/2022 8:08 AM	& Confidential)	Tamayo, Josefina	orida.com>	lorida.com>	
				Email between AHCA General Counsel		·				
				and EOG General Counsel's Office		FW: ADF Celebration of Promise		""Furino"",""	""Furino"",""	
			Attorney-	regarding ADF request to interview		to America's Parents (Privileged		Maureen; <maureen.furino@eo< td=""><td></td><td></td></maureen.furino@eo<>		
257	AHCA0260917	Pdf	Client;Work-Product		8/16/2022 9:48 AM	& Confidential)	Tamayo, Josefina	g.myflorida.com>	og.myflorida.com>	
				Email between Holtzman Vogel and				""Weida"",""	""Weida"",""	
050	AHCA0262301	Pdf	Attorney- Client;Work-Product	Chief of Staff regarding court order in	8/16/2022 2:19 PM	ATTORNEY WORK PRODUCT	Gary V. Perko	Jason; <jason.weida@ahca.m yflorida.com&gt;</jason.weida@ahca.m 	Jason; <jason.weida@ahca. myflorida.com&gt;</jason.weida@ahca. 	
258	AHCAU2023UT	Pui	Client, Work-Product	litigation. Attachment to email between Holtzman	0/10/2022 2.19 PW	ATTORNET WORK PRODUCT	Gary V. Perko	yilorida.com>	mynorida.com>	
			Attorney-	Vogel and Chief of Staff regarding court						
259	AHCA0262302	Pdf	Client;Work-Product							
				Email between Public Records and T.				""George"",""	""George"",""	
				George regarding outstanding records				Tracy; <tracy.george@ahca.< td=""><td>Tracy;<tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<></td></tracy.george@ahca.<>	Tracy; <tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<>	
260	AHCA0263186	Pdf	Attorney-Client	requests and media requests.	8/17/2022 9:56 AM		Gavins, Alexandra	myflorida.com>	myflorida.com>	
				Attachment to email between Public						
				Records and T. George regarding						
				outstanding records requests and media						
261	AHCA0263187	Excel	Attorney-Client	requests.						
				For all his town on Orange 1 Orange 1 1 1 11					WIO	
				Email between General Counsel staff				""Gavins"",""	""Gavins"",""	
262	AHCA0264995	Pdf	Attorney-Client	and public records regarding outstanding records and media requests.	8/17/2022 11:04 AM	FW: records requests	Belmont, Catherine	Alexandra; <alexandra.gavins @ahca.myflorida.com&gt;</alexandra.gavins 	Alexandra; <alexandra.gavin s@ahca.myflorida.com&gt;</alexandra.gavin 	
202	ANUAUZ04990	FUI	Automey-Client	Attachment to email between General	0/11/2022 11.04 AM	rw. records requests	Dennon, Camenne	@anca.mynonda.com>	awanca.mynonua.com>	
				Counsel staff and public records						
				regarding outstanding records and						
263	AHCA0264997	Excel	Attorney-Client	media requests; media tracker.						
- 1			,	Email between General Counsel staff				""Clemmons-Haire"",""	""Clemmons-Haire"",""	
				regarding staff duties for media				Mary; <mary.haire@ahca.myfl< td=""><td>Mary;<mary.haire@ahca.myf< td=""><td></td></mary.haire@ahca.myf<></td></mary.haire@ahca.myfl<>	Mary; <mary.haire@ahca.myf< td=""><td></td></mary.haire@ahca.myf<>	
264	AHCA0266505	Pdf	Work-Product	response.	8/18/2022 2:27 PM	RE: Draft memo	Grantham, Shena	orida.com>	lorida.com>	
								""George"",""	""George"",""	
				Email between General Counsel staff				Tracy; <tracy.george@ahca.< td=""><td>Tracy;<tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<></td></tracy.george@ahca.<>	Tracy; <tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<>	
265	AHCA0267158	Pdf	Attorney-Client	regarding public records requests.	8/22/2022 1:42 PM	RE: Public Records Daily Log	Gavins, Alexandra	myflorida.com>	myflorida.com>	
				Email between General Counsel staff				""Gavins"","" Alexandra: <alexandra.gavins< td=""><td>""Gavins"","" Alexandra:<alexandra.gavin< td=""><td></td></alexandra.gavin<></td></alexandra.gavins<>	""Gavins"","" Alexandra: <alexandra.gavin< td=""><td></td></alexandra.gavin<>	
266	AHCA0267173	Pdf	Attorney-Client	regarding public records requests.	8/22/2022 2:15 PM	RE: Public Records Daily Log	George, Tracy	@ahca.myflorida.com>	s@ahca.myflorida.com>	
200	AHCA0207173	Fui	Attorney-Cilent	regarding public records requests.	0/22/2022 2.13 FW	RE. Fublic Records Daily Log	George, Tracy	""George"",""	""George"",""	
				Email between General Counsel staff				Tracy; <tracy.george@ahca.< td=""><td>Tracy;<tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<></td></tracy.george@ahca.<>	Tracy; <tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<>	
267	AHCA0267200	Pdf	Attorney-Client	regarding public records requests.	8/22/2022 3:08 PM	status check of records requests	Gavins, Alexandra	myflorida.com>	myflorida.com>	
			,	Attachment to email between General		·			j	
				Counsel staff regarding public records						
268	AHCA0267201	Excel	Attorney-Client	requests; request tracker.						
								""George"",""	""George"",""	
				Email between General Counsel staff				Tracy; <tracy.george@ahca.< td=""><td>Tracy;<tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<></td></tracy.george@ahca.<>	Tracy; <tracy.george@ahca.< td=""><td></td></tracy.george@ahca.<>	
269	AHCA0267288	Pdf	Attorney-Client	regarding public records requests.	8/23/2022 1:09 PM	RE: public records	Gavins, Alexandra	myflorida.com>	myflorida.com>	
				Attachment to email between General Counsel staff regarding public records						
270	AHCA0267289	Excel	Attorney-Client	requests; request tracker.						
_, 0	10/10/01/203	LAUGI	/ morney-onerit	roquesto, request tracker.				""Gavins"".""	""Gavins"".""	
				Email between General Counsel staff				Alexandra; <alexandra.gavins< td=""><td>Alexandra;<alexandra.gavin< td=""><td></td></alexandra.gavin<></td></alexandra.gavins<>	Alexandra; <alexandra.gavin< td=""><td></td></alexandra.gavin<>	
271	AHCA0267290	Pdf	Attorney-Client	regarding public records requests.	8/23/2022 1:14 PM	FW: public records	George, Tracy	@ahca.myflorida.com>	s@ahca.myflorida.com>	
			1	Attachment to email between General		· ·	<u> </u>			
				Counsel staff regarding public records						
272	AHCA0267292	Excel	Attorney-Client	requests; request tracker.						
								""Tamayo"","" Josefina;"	""Tamayo"","" Josefina;"	
								"Sheeran"",""	"Sheeran"",""	
								Andrew; <josefina.tamayo@a< td=""><td>Andrew;<josefina.tamayo@< td=""><td></td></josefina.tamayo@<></td></josefina.tamayo@a<>	Andrew; <josefina.tamayo@< td=""><td></td></josefina.tamayo@<>	
				Email between General Counsel staff				hca.myflorida.com>; <andrew. Sheeran@ahca.myflorida.com</andrew. 	ahca.myflorida.com>; <andre w.Sheeran@ahca.myflorida.c</andre 	
273	AHCA0267296	Pdf	Attorney-Client	regarding public records requests.	8/23/2022 1:21 PM	RE: Public Records Request	George, Tracy	> sneeran@anca.myilonda.com	om>	
		I WI	, atomoy-onent	Attachment to email between General	5,25,2022 1.211 W	. t ubilo recordo request	Scorge, ridey	<u> </u>	OIII-	
				Counsel staff regarding public records						
274	AHCA0267300	Excel	Attorney-Client	requests; request tracker.						
								""Tamayo"","" Josefina;"	""Tamayo"","" Josefina;"	
								"Sheeran"",""	"Sheeran"",""	
								Andrew; <gperko@holtzmanvo< td=""><td>Andrew;<gperko@holtzmanv< td=""><td></td></gperko@holtzmanv<></td></gperko@holtzmanvo<>	Andrew; <gperko@holtzmanv< td=""><td></td></gperko@holtzmanv<>	
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275	AHCA0273234	Pdf	Attorney- Client:Work-Product	and Chief of Staff regarding recent court order.	8/25/2022 1:08 PM	Privileged & Confidential	Weida, Jason	ew.Sheeran@ahca.myflorida.c om>	Andrew.Sheeran@ahca.myfl orida.com>	
210	ATIONUZ/3234	Ful	Cherr, WORK-Product	order.	012312022 1.00 PM	Frivilegeu & Corilidential	Weiua, Jason	UIII2	Uliua.CUIII>	

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				Attachment to email between General						
			Attorney-	Counsel's Office and Chief of Staff						
276	AHCA0273235	Pdf	Client;Work-Product							
			Attorney-	Email between General Counsel's Office and Chief of Staff regarding recent court						
277	AHCA0273246	Pdf	Client;Work-Product	order.	8/25/2022 1:08 PM		Weida, Jason	Jason Weida	Jason Weida	
211	71110710270240	1 41	Olicini, VVOIK-1 Toddoo	order.	0/20/2022 1:00 T W		Wolda, bason	ouson vveida	ouson vvoida	
				Attachment to email between General						
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278	AHCA0273247	Pdf	Client;Work-Product	regarding recent court order; court order.						
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								""Sheeran"","" Andrew; <gperko@holtzmanvo< th=""><th>""Sheeran"","" Andrew;<gperko@holtzmanv< th=""><th></th></gperko@holtzmanv<></th></gperko@holtzmanvo<>	""Sheeran"","" Andrew; <gperko@holtzmanv< th=""><th></th></gperko@holtzmanv<>	
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279	AHCA0273305	Pdf	Client;Work-Product		8/25/2022 6:06 PM	Confidential)	Weida, Jason	@ahca.myflorida.com>	an@ahca.myflorida.com>	
				Attachment to email between General		,	·	, , , , , , , , , , , , , , , , , , ,		
			Attorney-	Counsel's Office and outside counsel						
280	AHCA0273307	Excel	Client;Work-Product	regarding litigation.						
								""Weida"",""	""Weida"",""	
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			Attorney-	Office, AHCA Chief of Staff, and outside		RE: Data File (Privileged &		gel.com>; <jason.weida@ahc< td=""><td>vogel.com&gt;;<jason.weida@< td=""><td></td></jason.weida@<></td></jason.weida@ahc<>	vogel.com>; <jason.weida@< td=""><td></td></jason.weida@<>	
281	AHCA0274220	Pdf	Client;Work-Product	counsel regarding litigation.	8/26/2022 8:45 AM	Confidential)	Sheeran, Andrew	a.myflorida.com>	ahca.myflorida.com>	
				<u> </u>		ŕ	*	""Sheeran"",""	""Sheeran"",""	
				Email between General Counsel's				Andrew; <gperko@holtzmanvo< td=""><td>Andrew;<gperko@holtzmanv< td=""><td></td></gperko@holtzmanv<></td></gperko@holtzmanvo<>	Andrew; <gperko@holtzmanv< td=""><td></td></gperko@holtzmanv<>	
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282	AHCA0275213	Pdf	Client;Work-Product	counsel regarding litigation.	8/26/2022 12:42 PM	Confidential)	Weida, Jason	ogel.com>	nvogel.com>	
				Attachment to email between General						
			Attorney-	Counsel's Office, AHCA Chief of Staff,						
283	AHCA0275215	Pdf	Client;Work-Product							
								Smoak, Kimberly;Wallace,		
				Email between General Counsel's Office				Thomas J.;George,		
004	ALIO A 0077454	D.16	A 44 Oli 4	and Public Records regarding	0/00/0000 7:44 444	Public Records requests currently	O-vin- Al-vin-di-	Tracy;Templeton, Mary	Smoak, Kimberly; Wallace,	George, Tracy;Templeton,
285	AHCA0277154 AHCA0277155	Pdf Excel	Attorney-Client Attorney-Client	outstanding requests.  Notes and request tracker.	8/29/2022 7:41 AM	open as of August 29, 2022	Gavins, Alexandra	Gay;Sokoloski, Kristin	Thomas J.	Mary Gay;Sokoloski, Kristin
286	AHCA0277156	Excel	Attorney-Client	Notes and request tracker.						
287	AHCA0277157	Excel	Attorney-Client	Notes and request tracker.						
288	AHCA0277158	Excel	Attorney-Client	Notes and request tracker.						
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289	AHCA0285275	Pdf	Work-Product	AHCA general Counsel's Office regarding ongoing litigation.	9/2/2022 2:43 PM	PRIVILEGED & CONFIDENTIAL Section 119.071(1)(d)1. F.S.	Gary V. Perko	hca.myflorida.com>;Gary V. Perko	Andrew; <andrew.sheeran@ ahca.myflorida.com&gt;</andrew.sheeran@ 	Gary V. Perko
209	A110A0203273	i di	WOIK-I TOUGCE	Attachment and notes to Email between	3/2/2022 2.43 T W	Section 119.071(1)(d)1.11.5.	Gary V. Ferko	I GIRO	anca.mynonda.com-	Gary V. Terko
				outside counsel and AHCA general						
1 1				Counsel's Office regarding ongoing						
290	AHCA0285277	Pdf	Work-Product	litigation.						
				Attachment and notes to Email between						
1				outside counsel and AHCA general Counsel's Office regarding ongoing						
291	AHCA0285280	Pdf	Work-Product	litigation.						
201	0/ 10200200	1 41	. FOIK-I TOUGUL	nagation.				""Weida"","" Jason;"	""Weida"","" Jason;"	
1								"George"",""	"George"",""	
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292	AHCA0285285	Pdf	Work-Product	regarding ongoing litigation.	9/2/2022 3:24 PM	119.071(1)(d)1. F.S.	Sheeran, Andrew	@ahca.myflorida.com>	ge@ahca.myflorida.com>	
292	AHCA0285285	Pdf	Work-Product	regarding ongoing litigation. Attachment and notes to Email between	9/2/2022 3:24 PM	119.071(1)(d)1. F.S.	Sheeran, Andrew	@anca.mynonda.com>	ge@anca.mynonda.com>	
292	AHCA0285285	Pdf	Work-Product	regarding ongoing litigation.  Attachment and notes to Email between outside counsel and AHCA general	9/2/2022 3:24 PM	119.071(1)(d)1. F.S.	Sheeran, Andrew	@anca.mynonda.com>	ge@anca.myilonda.com>	
292	AHCA0285285 AHCA0285287	Pdf Pdf	Work-Product Work-Product	regarding ongoing litigation. Attachment and notes to Email between	9/2/2022 3:24 PM	119.071(1)(d)1. F.S.	Sheeran, Andrew	@anca.mynonda.com>	ge@anca.mynonda.com>	
				regarding ongoing litigation.  Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing	9/2/2022 3:24 PM	119.071(1)(d)1. F.S.	Sheeran, Andrew	@anca.mynonda.com>	ge@anca.myllonda.com>	
				regarding ongoing litigation.  Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.  Attachment and notes to Email between outside counsel and AHCA general	9/2/2022 3:24 PM	119.071(1)(d)1. F.S.	Sheeran, Andrew	@anca.mynonua.com>	ge@anca.mynonta.com>	
293	AHCA0285287	Pdf	Work-Product	regarding ongoing litigation. Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation. Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing	9/2/2022 3:24 PM	119.071(1)(d)1. F.S.	Sheeran, Andrew	ganca.mynonua.com	ge@anca.mynonua.com>	
				regarding ongoing litigation.  Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.  Attachment and notes to Email between outside counsel and AHCA general	9/2/2022 3:24 PM	119.071(1)(d)1. F.S.	Sheeran, Andrew	@anca.nyiionda.com>	ge@anca.mynonca.com>	
293	AHCA0285287	Pdf	Work-Product	regarding ongoing litigation. Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation. Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing	9/2/2022 3:24 PM	119.071(1)(d)1. F.S.	Sheeran, Andrew			
293	AHCA0285287	Pdf	Work-Product	regarding ongoing litigation. Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation. Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing	9/2/2022 3:24 PM	119.071(1)(d)1. F.S.	Sheeran, Andrew	""Sheeran"","" Andrew;"	""Sheeran"","" Andrew;"	
293	AHCA0285287	Pdf	Work-Product	regarding ongoing litigation. Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation. Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing	9/2/2022 3:24 PM	119.071(1)(d)1. F.S.  RE: PRIVILEGED &	Sheeran, Andrew		""Sheeran"","" Andrew," "George"",""	
293	AHCA0285287	Pdf	Work-Product	regarding ongoing litigation.  Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.  Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	9/2/2022 3:24 PM		Sheeran, Andrew  Weida, Jason	""Sheeran"", "" Andrew," "George"", ""	""Sheeran"","" Andrew," "George"",""	

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296	AHCA0295177	Pdf	Client:Work-Product	regarding ongoing litigation.	9/7/2022 11:42 AM	PRIVILEGED & CONFIDENTIAL	Weida, Jason	hca.mvflorida.com>	ahca.myflorida.com>	
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				outside counsel and AHCA general						
			Attorney-	Counsel's Office regarding ongoing						
297	AHCA0295178	Pdf	Client;Work-Product	litigation.						
				Attachment and notes to Email between						
				outside counsel and AHCA general						
			Attorney-	Counsel's Office regarding ongoing						
298	AHCA0295263	Pdf	Client;Work-Product	litigation.						
				Email between AHCA General						
			Attorney-	Counsel's Office and EOG General		Fwd: PRIVILEGED &		<maureen.furino@eog.myflori< td=""><td></td><td></td></maureen.furino@eog.myflori<>		
299	AHCA0295265	Pdf	Client;Work-Product	Counsel's Office regarding lawsuit.	9/7/2022 11:45 AM	CONFIDENTIAL	Sheeran, Andrew	da.com>	ida.com>	
				Attachment to Email between AHCA						
				General Counsel's Office and EOG						
			Attorney-	General Counsel's Office regarding						
300	AHCA0295266	Pdf	Client;Work-Product	lawsuit.						
				Attachment to Email between AHCA						
				General Counsel's Office and EOG						
204	ALIO A 00005054	D-16	Attorney-	General Counsel's Office regarding lawsuit.						
301	AHCA0295351	Pdf	Client;Work-Product	lawsuit. Email between AHCA General Counsel				Marstiller, Simone; Wallace,		
			Attorney-			Fwd: PRIVILEGED &		Thomas J.:Farrill.	Marstiller, Simone; Wallace,	
302	AHCA0295353	Pdf	Client:Work-Product	and Secretary regarding ongoing litigation.	9/7/2022 11:59 AM	CONFIDENTIAL	Sheeran, Andrew	Cody;Weida, Jason	Thomas J.;Farrill, Cody	Weida, Jason
302	ALICAUZ93333	Fül	Ciletit, WOTK-Product	Attachment to email between AHCA	3/1/2022 11.39 AIVI	CONFIDENTIAL	Sileeran, Andrew	Couy, welda, Jason	momas J.,ramii, Cody	weiua, Jason
			Attorney-	General Counsel and Secretary						
303	AHCA0295354	Pdf	Client:Work-Product	regarding ongoing litigation.						
500	7.11.107.10200004	. ui	S.I.S.II., F. SIK-1 TOUGO	Attachment to email between AHCA				1		
			Attorney-	General Counsel and Secretary						
304	AHCA0295439	Pdf	Client; Work-Product	regarding ongoing litigation.						