

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

AUGUST DEKKER, *et al.*,

*Plaintiffs,*

v.

JASON WEIDA, *et al.*,

*Defendants.*

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

**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,<sup>1</sup> 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

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<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. Sickie*, 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>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.<sup>3</sup> *See* Fla. Stat. §120.54(c)(1) (“any

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<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).<sup>4</sup> 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

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<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

Respectfully Submitted,

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*\* Admitted pro hac vice*

*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)

miriam grossman <[REDACTED]>

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

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**From:** miriam grossman <[REDACTED]>

**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.

[REDACTED]

Miriam Grossman MD

Board-Certified in Child, Adolescent and Adult Psychiatry

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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.*

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**From:** Andre Van Mol <[95andrev@gmail.com](mailto:95andrev@gmail.com)>  
**Sent:** Tuesday, July 19, 2022 9:51 PM  
**To:** Weida, Jason <[Jason.Weida@ahca.myflorida.com](mailto:Jason.Weida@ahca.myflorida.com)>  
**Cc:** Van Meter Quentin <[kidendo@comcast.net](mailto:kidendo@comcast.net)>; miriam grossman <[REDACTED]>; Tamayo, Josefina <[Josefina.Tamayo@ahca.myflorida.com](mailto:Josefina.Tamayo@ahca.myflorida.com)>; [mjazil@holtzmanvogel.com](mailto:mjazil@holtzmanvogel.com) <[mjazil@holtzmanvogel.com](mailto:mjazil@holtzmanvogel.com)>; [gperko@holtzmanvogel.com](mailto:gperko@holtzmanvogel.com) <[gperko@holtzmanvogel.com](mailto: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](mailto: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 <[Jason.Weida@ahca.myflorida.com](mailto:Jason.Weida@ahca.myflorida.com)> wrote:

**PRIVILEGED & CONFIDENTIAL**  
**ATTORNEY WORK PRODUCT PROTECTED**

Andre, Quentin, and Miriam,

GROSSMAN0068

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

2727 Mahan Drive  
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+1 850-228-1898 (Cell)

[Jason.Weida@ahca.myflorida.com](mailto: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 that the 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 producing 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](mailto:mbeato@HoltzmanVogel.com) // [www.HoltzmanVogel.com](http://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



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FAX (352) 271-8347 ♦ slc@southernlegal.org ♦ www.southernlegal.org

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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 98-107<sup>1</sup>, 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**)

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<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

	A	B	C	D	E	F	G	H	I	J
1	<b>Defendants' Amended Privilege Log</b>									
2	<b>Bates Number</b>	<b>Document Type</b>	<b>Privilege Tags</b>	<b>Privilege Note</b>	<b>Sent Date</b>	<b>Subject</b>	<b>From</b>	<b>Recipients</b>	<b>To</b>	<b>CC</b>
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@ahca.myflorida.com>	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
4	AHCA0003349	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	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@ahca.myflorida.com>	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
5	AHCA0003350	Pdf	Work-Product	Attachment to email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria; Decision Summary.						
6	AHCA0003461	Pdf	Work-Product	Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria.	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@ahca.myflorida.com>	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
7	AHCA0003462	Pdf	Work-Product	Attachment to email between AHCA 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@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	""Sheeran"" "" Andrew;" "Kellum"" "" Kim;" "Bunton"" "" Samuel;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	
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@ahca.myflorida.com>	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
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@ahca.myflorida.com>	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
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 similar 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@ahca.myflorida.com>	""Templeton"" "" Mary Gay;<MaryGay.Templeton@ahca.myflorida.com>	
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.						
17	AHCA0076601	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.	3/25/2022 8:20 AM	Cases of interest	Bunton, Samuel	""Templeton"" "" Mary Gay;<MaryGay.Templeton@ahca.myflorida.com>	""Templeton"" "" Mary Gay;<MaryGay.Templeton@ahca.myflorida.com>	
18	AHCA0076602	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.						
19	AHCA0076607	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.						
20	AHCA0076618	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.						
21	AHCA0077010	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel staff and outside counsel concerning HHS notice and guidance concerning gender-affirming care.	3/25/2022 11:21 AM	US v FI Confidential	Tamayo, Josefina	Andy Bardos - 2825 (Andy.Bardos@gray-robinson.com);Sheeran, Andrew	Andy Bardos - 2825 (Andy.Bardos@gray-robinson.com)	Sheeran, Andrew



	A	B	C	D	E	F	G	H	I	J
22	AHCA0077011	Pdf	Work-Product	Attachment to Email between AHCA General Counsel staff regarding similar case; HHS Notice and Guidance on gender Affirming Care, Civil Rights, and Patient Privacy.						
23	AHCA0084244	Pdf	Work-Product	Email between AHCA General Counsel staff regarding relevant statutory provisions.	4/4/2022 4:20 PM		Templeton, Mary Gay	""Kellum"" ; Kim;<Kim.Kellum@ahca.myflorida.com>	""Kellum"" ; Kim;<Kim.Kellum@ahca.myflorida.com>	
24	AHCA0084245	Pdf	Work-Product	Email between AHCA General Counsel staff regarding similar case.						
25	AHCA0087361	Pdf	Work-Product	Email between AHCA General Counsel and outside counsel concerning information on potential experts.	4/18/2022 11:11 AM	FW: Conference with Dr. Cantor	Ashley Hoffman Lukis	""Sheeran"" ; Andrew;<andrew.sheeran@ahca.myflorida.com>	""Sheeran"" ; Andrew;<andrew.sheeran@ahca.myflorida.com>	
26	AHCA0087362	Pdf	Work-Product	Email between AHCA General Counsel and outside counsel concerning information on potential experts.						
27	AHCA0141306	Pdf	Attorney-Client;Work-Product	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 finalizing recommendation regarding the rule.	6/1/2022 1:09 PM	RE: Discussion [Privileged]	Giering, Cole	""Weida"" ; Jason;<Jason.Weida@ahca.myflorida.com>;Farrill, Cody;Sheeran, Andrew;Dalton, Ann;Grantham, Shena;Tamayo, Josefina;Kellum, Kim	""Weida"" ; Jason;<Jason.Weida@ahca.myflorida.com>	Farrill, Cody;Sheeran, Andrew;Dalton, Ann;Grantham, Shena;Tamayo, Josefina;Kellum, Kim
28	AHCA0141308	Pdf	Attorney-Client;Work-Product	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 finalizing recommendation regarding the rule.						
29	AHCA0141309	Pdf	Attorney-Client;Work-Product	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 finalizing recommendation regarding the rule.						
30	AHCA0141315	Pdf	Attorney-Client;Work-Product	Email from AHCA Program Administrator to Assistant Deputy Secretary for Medicaid re: revisions to rule as part of broader legal and policy review.	6/1/2022 3:15 PM	RE: Discussion [Privileged]	Giering, Cole	""Weida"" ; Jason;<Jason.Weida@ahca.myflorida.com>	""Weida"" ; Jason;<Jason.Weida@ahca.myflorida.com>	
31	AHCA0141317	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Program Administrator to Assistant Deputy Secretary for Medicaid re: revisions to rule.						
32	AHCA0144360	Pdf	Attorney-Client	Email exchange between counsel in AHCA General Counsel's Office re: legal analysis and review of public records request responses.	6/3/2022 8:24 AM	FW: Public Records Daily Log	George, Tracy	""Kellum"" ; Kim;" "Grantham"" ; Shena;" "Sheeran"" ; Andrew;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>;Shoop,	""Kellum"" ; Kim;" "Grantham"" ; Shena;" "Sheeran"" ; Andrew;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	Shoop,
33	AHCA0144377	Pdf	Attorney-Client	Email exchange between counsel in AHCA General Counsel's Office re: legal analysis and review of public records request responses.	6/3/2022 8:35 AM	RE: Public Records Daily Log	Shoop, Richard	""George"" ; Tracy;<Tracy.George@ahca.myflorida.com>	""George"" ; Tracy;<Tracy.George@ahca.myflorida.com>	
34	AHCA0144384	Pdf	Attorney-Client	Email exchange between counsel in AHCA General Counsel's Office re: legal analysis and review of public records request responses.	6/3/2022 8:42 AM	RE: Public Records Daily Log [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Sheeran, Andrew	""George"" ; Tracy;" "Kellum"" ; Kim;" "Grantham"" ; Shena;<Kim.Kellum@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	""George"" ; Tracy;" "Kellum"" ; Kim;" "Grantham"" ; Shena;<Kim.Kellum@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
35	AHCA0144404	Pdf	Attorney-Client;Work-Product	Email exchange between counsel in AHCA General Counsel's Office re: legal analysis and review of public records request responses.	6/3/2022 9:28 AM	RE: Public Records Daily Log [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	George, Tracy	""Sheeran"" ; Andrew;<Andrew.Sheeran@ahca.myflorida.com>	""Sheeran"" ; Andrew;<Andrew.Sheeran@ahca.myflorida.com>	

	A	B	C	D	E	F	G	H	I	J
36	AHCA0151614	Pdf	Attorney-Client	Email from AHCA Administrator to AHCA General Counsel's Office; AHCA Bureau Chief, Assistant Deputy Secretary for Medicaid, and AHCA Senior Pharmacist re: legal analysis of governing statutory provision.	6/6/2022 11:35 AM	Follow Up from Friday Gender Dysphoria Meeting	Peterson, Ashley	""Dalton"" "" Ann;" "Sheeran"" "" Andrew;" "Kellum"" "" Kim;<Ann.Dalton@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	""Dalton"" "" Ann;" "Sheeran"" "" Andrew;" "Kellum"" "" Kim;<Ann.Dalton@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	
37	AHCA0151615	Pdf	Attorney-Client	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 analysis of governing statutory provision.						
38	AHCA0151617	Pdf	Attorney-Client	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 analysis of governing statutory provision.						
39	AHCA0159399	Pdf	Attorney-Client	Email from AHCA General Counsel's Office to Public Records Office re: public records request response.	6/9/2022 3:48 PM	FW: Public Records Request   GAPMS Memo & Related Documents	George, Tracy	""Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	""Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
40	AHCA0159580	Pdf	Attorney-Client;Work-Product	Email from AHCA Assistant Deputy Secretary for Medicaid to EOG's General Counsel's Office re: discussion of caselaw and legal developments.	6/10/2022 3:47 PM	Privileged & Confidential	Weida, Jason	""Furino"" "" Maureen;<Maureen.Furino@eog.myflorida.com>	""Furino"" "" Maureen;<Maureen.Furino@eog.myflorida.com>	
41	AHCA0159581	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Assistant Deputy Secretary for Medicaid to EOG's Office re: discussion of caselaw and legal developments.						
42	AHCA0159622	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Assistant Deputy Secretary for Medicaid to EOG's Office re: discussion of caselaw and legal developments.						
43	AHCA0159640	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Assistant Deputy Secretary for Medicaid to EOG's Office re: discussion of caselaw and legal developments.						
44	AHCA0160500	Pdf	Attorney-Client;Work-Product	Email from AHCA General Counsel's Office to Assistant Deputy Secretary for Medicaid re: legal developments.	6/13/2022 8:43 AM	Lange v. Houston County	Sheeran, Andrew	""Weida"" "" Jason;<Jason.Weida@ahca.myflorida.com>	""Weida"" "" Jason;<Jason.Weida@ahca.myflorida.com>	
45	AHCA0160501	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA General Counsel's Office to Assistant Deputy Secretary for Medicaid re: legal developments.						
46	AHCA0160534	Pdf	Attorney-Client;Work-Product	Email from AHCA Assistant Deputy Secretary to EOG General Counsel's Office re: discussion of legal developments.	6/13/2022 8:53 AM	Georgia Case	Weida, Jason	""Furino"" "" Maureen;<Maureen.Furino@eog.myflorida.com>	""Furino"" "" Maureen;<Maureen.Furino@eog.myflorida.com>	
47	AHCA0160535	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA Assistant Deputy Secretary to EOG re: discussion of legal developments.						
48	AHCA0162930	Pdf	Attorney-Client;Work-Product	Email between General Counsel's office and outside counsel concerning ongoing litigation.	6/13/2022 1:20 PM	claire_v_florida_complaint.pdf	Christopher Lunny	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
49	AHCA0162931	Pdf	Attorney-Client;Work-Product	Attachment to email between General Counsel's office and outside counsel concerning ongoing litigation; complaint attached.						
50	AHCA0162984	Pdf	Attorney-Client;Work-Product	Email between General Counsel's office and outside counsel concerning ongoing litigation.	6/13/2022 1:22 PM	Keohane v Jones.rtf	Christopher Lunny	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
51	AHCA0162985	Pdf	Attorney-Client;Work-Product	Attachment to email between General Counsel's office and outside counsel concerning ongoing litigation.						

	A	B	C	D	E	F	G	H	I	J
52	AHCA0163009	Pdf	Attorney-Client;Work-Product	Email from Assistant Deputy Secretary for Medicaid to EOG General Counsel's Office regarding amicus brief.	6/13/2022 3:45 PM		Weida, Jason	""Furino"" Maureen;<Maureen.Furino@eog.myflorida.com>	""Furino"" Maureen;<Maureen.Furino@eog.myflorida.com>	
53	AHCA0163010	Pdf	Attorney-Client;Work-Product	Attachment to email from Assistant Deputy Secretary for Medicaid to EOG General Counsel's Office regarding amicus brief.						
54	AHCA0163217	Pdf	Attorney-Client;Work-Product	Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: Privileged & Confidential	Weida, Jason	""Sheeran"" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	""Sheeran"" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
55	AHCA0163218	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation; pleadings.						
56	AHCA0163259	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation; pleadings.						
57	AHCA0163277	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation; pleadings.						
58	AHCA0163309	Pdf	Attorney-Client;Work-Product	Email between AHCA Chief of Staff and EOG General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: Georgia Case	Weida, Jason	""Sheeran"" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	""Sheeran"" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
59	AHCA0163310	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Chief of Staff and EOG General Counsel's Office regarding similar litigation.						
60	AHCA0163343	Pdf	Attorney-Client;Work-Product	Email by lawyer to himself regarding similar litigation.	6/14/2022 9:34 AM		Jason Weida	<jason.weida@ahca.myflorida.com>	<jason.weida@ahca.myflorida.com>	
61	AHCA0163344	Pdf	Attorney-Client;Work-Product	Attachment (court opinion) of email by lawyer to himself regarding similar litigation.						
62	AHCA0163367	Pdf	Attorney-Client;Work-Product	Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation.	6/14/2022 9:34 AM	FW:	Weida, Jason	""Sheeran"" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	""Sheeran"" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
63	AHCA0163368	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Chief of Staff and General Counsel's Office regarding similar litigation.						
64	AHCA0164568	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel's Office regarding similar litigation.	6/14/2022 11:34 AM	ATTORNEY WORK PRODUCT	Sheeran, Andrew	""Kellum"" Kim;<Kim.Kellum@ahca.myflorida.com>	""Kellum"" Kim;<Kim.Kellum@ahca.myflorida.com>	
65	AHCA0164569	Pdf	Attorney-Client;Work-Product	Email between Chief of Staff and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: Privileged & Confidential	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
66	AHCA0164570	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA General Counsel's Office regarding similar litigation.						
67	AHCA0164611	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA General Counsel's Office regarding similar litigation.						
68	AHCA0164629	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA General Counsel's Office regarding similar litigation.						
69	AHCA0164661	Pdf	Attorney-Client;Work-Product	Email between AHCA Assistant Deputy 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	
70	AHCA0164662	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.						
71	AHCA0164695	Pdf	Attorney-Client;Work-Product	Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: WV	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
72	AHCA0164696	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.						

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73	AHCA0164741	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.						
74	AHCA0164773	Pdf	Attorney-Client;Work-Product	Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:34 AM	FW:	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
75	AHCA0164774	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.						
76	AHCA0164797	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel's Office staff regarding similar litigation.	6/14/2022 1:23 PM	FW: ATTORNEY WORK PRODUCT	Kellum, Kim	""Grantham"" "" Shena;<Shena.Grantham@ahca.myflorida.com>	""Grantham"" "" Shena;<Shena.Grantham@ahca.myflorida.com>	
77	AHCA0164798	Pdf	Attorney-Client;Work-Product	Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: Privileged & Confidential	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
78	AHCA0164799	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.						
79	AHCA0164840	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.						
80	AHCA0164858	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.						
81	AHCA0164890	Pdf	Attorney-Client;Work-Product	Email between AHCA Assistant Deputy 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	
82	AHCA0164891	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.						
83	AHCA0164924	Pdf	Attorney-Client;Work-Product	Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:33 AM	FW: WV	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
84	AHCA0164925	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.						
85	AHCA0164970	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.						
86	AHCA0165002	Pdf	Attorney-Client;Work-Product	Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.	6/14/2022 9:34 AM	FW:	Weida, Jason	Sheeran, Andrew	Sheeran, Andrew	
87	AHCA0165003	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA Assistant Deputy Secretary and AHCA General Counsel's Office regarding similar litigation.						
88	AHCA0165028	Pdf	Attorney-Client;Work-Product	Email between General Counsel and General Counsel staff regarding caselaw research.	6/14/2022 5:19 PM	RE: Cases	Sheeran, Andrew	""Tamayo"" "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	""Tamayo"" "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
89	AHCA0178543	Pdf	Work-Product	Email between EOG General Counsel's Office and AHCA General Counsel relating to similar litigation.	6/28/2022 7:28 PM	FW: Doe v. Snyder	Furino, Maureen	""Tamayo"" "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>;Sheeran, Andrew	""Tamayo"" "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	Sheeran, Andrew
90	AHCA0178544	Pdf	Work-Product	Attachment to Email between EOG General Counsel's Office and AHCA General Counsel relating to similar litigation.						

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91	AHCA0178580	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel and outside counsel relating to similar litigation.	6/29/2022 5:28 AM	Fwd: Doe v. Snyder	Tamayo, Josefina	Mohammad O. Jazil;"Weida";" Jason;"Sheeran";" Andrew;"Grantham";" Shena;"<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	Mohammad O. Jazil;"Weida";" Jason;"Sheeran";" Andrew;"Grantham";" Shena;"<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	
92	AHCA0178582	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA General Counsel and outside counsel relating to similar litigation.						
93	AHCA0180494	Pdf	Attorney-Client;Work-Product	Email between General Counsel's Office, staff, and outside counsel regarding compliance with federal statutory requirements.	7/1/2022 1:51 PM	ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT	Sheeran, Andrew	Mohammad O. Jazil;Gary V. Perko;"Kellum";" Kim;"Grantham";" Shena;"Tamayo";" Josefine;"Weida";" Jason;"Brackett";" Matt	Mohammad O. Jazil;Gary V. Perko;"Kellum";" Kim;"Grantham";" Shena;"Tamayo";" Josefine;"Weida";" Jason;"Brackett";" Matt	
94	AHCA0181336	Pdf	Attorney-Client;Work-Product	Email between outside counsel and General Counsel's Office regarding draft script.	7/4/2022 9:25 AM	Attorney Client Privileged & Confidential / Attorney Work Product / July 8th Hearing	Mohammad O. Jazil	"Tamayo";" Josefine;"Weida";" Jason;"Sheeran";" Andrew;"Grantham";" Shena	"Tamayo";" Josefine;"Weida";" Jason;"Sheeran";" Andrew;"Grantham";" Shena	
95	AHCA0181337	Pdf	Attorney-Client;Work-Product	Draft remarks/script. shared with counsel for review and comment.						
96	AHCA0181345	Pdf	Attorney-Client;Work-Product	Email between General Counsel and outside counsel regarding comments and strategy for rulemaking.	7/4/2022 10:57 AM	Rule hearing edits (confidential)	Tamayo, Josefina	<mjzazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>;" Weida";" Jason;"Sheeran";" Andrew;"Grantham";" Shena;"Kellum";" Kim;"Giering";" Cole	<mjzazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>;" Weida";" Jason;"Sheeran";" Andrew;"Grantham";" Shena;"Kellum";" Kim;"Giering";" Cole	
97	AHCA0181346	Pdf	Attorney-Client;Work-Product	Draft remarks/script provided to counsel for review and comments.						
98	AHCA0181390	Pdf	Work-Product	Email between counsel regarding preparation for rulemaking proceedings.	7/5/2022 9:53 AM	RE: Rule hearing edits (confidential)	Weida, Jason	"Tamayo";" Josefine;"Josefine;"<mjzazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>;" Sheeran";" Andrew;"Grantham";" Shena;"Kellum";" Kim;"Giering";" Cole;Zack	"Tamayo";" Josefine;"Josefine;"<mjzazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>;" Sheeran";" Andrew;"Grantham";" Shena;"Kellum";" Kim;"Giering";" Cole	Zack
99	AHCA0181391	Pdf	Work-Product	Draft remarks/script.						
100	AHCA0181397	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 10:50 AM	RE: Rule document	Grantham, Shena	"Tamayo";" Josefine;"Kellum";" Kim;"Sheeran";" Andrew;"Josefine.Tamayo@ahca.myflorida.com";<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	"Tamayo";" Josefine;"Kellum";" Kim;"Sheeran";" Andrew;"Josefine.Tamayo@ahca.myflorida.com";<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	
101	AHCA0181398	Pdf	Work-Product	Draft remarks/script.						
102	AHCA0181404	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 11:08 AM	Edits	Tamayo, Josefina	"Grantham";" Shena;"Sheeran";" Andrew;"Kellum";" Kim;"<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	"Grantham";" Shena;"Sheeran";" Andrew;"Kellum";" Kim;"<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	
103	AHCA0181405	Pdf	Work-Product	Draft remarks/script for hearing.						
104	AHCA0181411	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 11:14 AM	RE: Edits	Grantham, Shena	"Tamayo";" Josefine;"Josefine;"<Josefine.Tamayo@ahca.myflorida.com>;Sheeran;"Andrew;Kellum, Kim	"Tamayo";" Josefine;"Josefine;"<Josefine.Tamayo@ahca.myflorida.com>;Sheeran;"Andrew;Kellum, Kim	Sheeran, Andrew;Kellum, 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, Josefine;Sheeran, Andrew;Kellum, Kim	Tamayo, Josefine	Sheeran, Andrew;Kellum, Kim
107	AHCA0181424	Pdf	Work-Product	Draft remarks and script for hearing.						

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108	AHCA0181431	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/5/2022 2:05 PM	RE: Rule Document (Confidential)	Mohammad O. Jazil	""Tamayo"" "" Josefina; Gary V. Perko; Zack Bennington; ""Grantham"" "" Shena; ""Sheeran"" "" Andrew; Weida"" "" Jason; ""Kellum"" "" Kim; ""Giering"" "" Cole	""Tamayo"" "" Josefina; Gary V. Perko; Zack Bennington; ""Grantham"" "" Shena; ""Sheeran"" "" Andrew; Weida"" "" Jason; ""Kellum"" "" 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.myflorida.com>	Michael Beato; ""Sheeran"" "" Andrew; Gary V. Perko; ""Tamayo"" "" Josefina; ""Weida"" "" Jason; <Jason.Weida@ahca.myflorida.com>	
111	AHCA0181457	Pdf	Work-Product	Attachment to email, notes and redlines on Quality of Evidence and Discrimination QA.						
112	AHCA0181468	Pdf	Work-Product	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"" "" Kim	Tamayo, Josefina; Templeton, Mary Gay; Sheeran, Andrew; Kellum, Kim; Brackett"" "" Matt; ""Weida"" "" Jason; ""Kellum"" "" Kim	
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	<mjazil@holtzmanvogel.com>; <gperko@holtzmanvogel.com>; ""Sheeran"" "" Andrew; ""Grantham"" "" Shena; Giering"" "" Cole; ""Brackett"" "" Matt; ""Weida"" "" Jason; ""Kellum"" "" Kim	<mjazil@holtzmanvogel.com>; <gperko@holtzmanvogel.com>; ""Sheeran"" "" Andrew; ""Grantham"" "" Shena; Giering"" "" Cole; ""Brackett"" "" Matt; ""Weida"" "" Jason; ""Kellum"" "" Kim	
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.						
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	""Grantham"" "" Shena; <Shena.Grantham@ahca.myflorida.com>	""Grantham"" "" Shena; <Shena.Grantham@ahca.myflorida.com>	
119	AHCA0181526	Pdf	Work-Product	Draft remarks and script for hearing.						
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	""Giering"" "" Cole; ""Tamayo"" "" Josefina; Mohammad O. Jazil; Gary V. Perko; ""Sheeran"" "" Andrew; Mattson"" "" John; ""Kellum"" "" Kim; ""Weida"" "" Jason	
121	AHCA0181532	Pdf	Work-Product	Draft remarks and script for hearing.						
122	AHCA0181594	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	7/7/2022 10:51 AM	RE: Edits to the Meeting	Giering, Cole	""Grantham"" "" Shena; <Shena.Grantham@ahca.myflorida.com>	""Grantham"" "" Shena; <Shena.Grantham@ahca.myflorida.com>	
123	AHCA0181596	Pdf	Work-Product	Draft remarks and script for hearing.						
124	AHCA0181627	Pdf	Work-Product	Email between counsel regarding edits to hearing script.	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;	
125	AHCA0181628	Pdf	Work-Product	Draft remarks and script for hearing.						
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@ahca.myflorida.com>	""Sheeran"" "" Andrew; <Andrew.Sheeran@ahca.myflorida.com>	

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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@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	""Tamayo"" , "" Josefina," "Kellum"" , "" Kim;" "Grantham"" "" Shena;<Josefina.Tamayo@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	
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.Tamayo@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	""Tamayo"" , "" Josefina," "Kellum"" , "" Kim;" "Grantham"" "" Shena;<Josefina.Tamayo@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	
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	RE: proposal for board [ATTORNEY WORK PRODUCT PRIVILEGED AND EXEMPT]	Grantham, Shena	""Sheeran"" , "" Andrew;" "Tamayo"" , "" Josefina," "Kellum"" "" Kim;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	""Sheeran"" , "" Andrew;" "Tamayo"" , "" Josefina," "Kellum"" "" Kim;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
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@ahca.myflorida.com>	""Templeton"" , "" Mary Gay;<MaryGay.Templeton@ahca.myflorida.com>	
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>	""Tamayo"" , "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
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>	""Tamayo"" , "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
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>	""Tamayo"" , "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
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>	""Tamayo"" , "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
141	AHCA0196211	Pdf	Attorney-Client;Work-Product	Attachment, notes and comments on language proposed by DOH.						
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	Comment Summary (ATTORNEY WORK PRODUCT CONFIDENTIAL - PURSUANT TO §119.071(1)(d)1..F.S.)	Brackett, Matt	""Tamayo"" , "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	""Tamayo"" , "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
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.myflorida.com>	""Weida"" , "" Jason;<Jason.Weida@ahca.myflorida.com>	
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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146	AHCA0206637	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Program Administrator and counsel re: comments regarding Proposed Rule No. 59G-1.050.	7/21/2022 10:12 AM	RE: Public comments	Giering, Cole	Gary V. Perko;Weida, Jason	Gary V. Perko	Weida, Jason
147	AHCA0206638	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Program Administrator and counsel re: comments regarding Proposed Rule No. 59G-1.050.	7/8/2022 5:05 PM	Comments by Lambda Legal regarding Notice of Proposed Rule Changes to Rule No. 59G-1.050: General Medicaid Policy (Notice No. 25979915), Prohibiting Coverage of Treatment for Gender Dysphoria	Omar Gonzalez-Pagan	MEDICAID RULE	MEDICAID RULE	
148	AHCA0206639	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Program Administrator and counsel re: comments regarding Proposed Rule No. 59G-1.050.						
149	AHCA0209851	Pdf	Attorney-Client;Work-Product	Email from counsel to AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid with legal analysis in anticipation of litigation.	7/21/2022 10:39 AM	PRIVILEGED & CONFIDENTIAL	Gary V. Perko	""Tamayo"" "" Josefine," "Weida"" "" Jason," "Grantham"" "" Shena," "Sheeran"" "" Andrew;<Josefine.Tamayo@ahca.myflorida.com>;Mohammad O. Jazil	""Tamayo"" "" Josefine," "Weida"" "" Jason," "Grantham"" "" Shena," "Sheeran"" "" Andrew;<Josefine.Tamayo@ahca.myflorida.com>	Mohammad O. Jazil
150	AHCA0209852	Pdf	Attorney-Client;Work-Product	Attachment to email from counsel to AHCA General Counsel's Office and Assistant Deputy Secretary for Medicaid with legal analysis in anticipation of litigation.						
151	AHCA0211232	Pdf	Attorney-Client;Work-Product	Email between counsel and AHCA General Counsel's Office regarding legal analysis in anticipation of litigation.	7/21/2022 11:19 AM	Re: PRIVILEGED & CONFIDENTIAL	Tamayo, Josefine	Gary V. Perko;" "Weida"" "" Jason;" "Grantham"" "" Shena;" "Sheeran"" "" Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	Gary V. Perko;" "Weida"" "" Jason;" "Grantham"" "" Shena;" "Sheeran"" "" Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
152	AHCA0211234	Pdf	Attorney-Client;Work-Product	Email from AHCA General Counsel's Office and AHCA Secretary regarding counsel's legal analysis in anticipation of litigation.	7/21/2022 11:20 AM	Fwd: PRIVILEGED & CONFIDENTIAL	Tamayo, Josefine	""Marstiller"" "" Simone;<Simone.Marstiller@ahca.myflorida.com>	""Marstiller"" "" Simone;<Simone.Marstiller@ahca.myflorida.com>	
153	AHCA0211235	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA General Counsel's Office and AHCA Secretary regarding counsel's legal analysis in anticipation of litigation.						
154	AHCA0211282	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel's Office counsel and EOG regarding legal analysis in anticipation of litigation.	7/21/2022 4:50 PM	Fwd: PRIVILEGED & CONFIDENTIAL	Tamayo, Josefine	Ryan D. Newman;" "Furino"" "" Maureen;<maureen.furino@eog.myflorida.com>	Ryan D. Newman;" "Furino"" "" Maureen;<maureen.furino@eog.myflorida.com>	
155	AHCA0211283	Pdf	Attorney-Client;Work-Product	Attachment to email between AHCA General Counsel's Office counsel regarding legal analysis in anticipation of litigation.						
156	AHCA0226988	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.	7/25/2022 9:01 AM	RE: Yale (Privileged & Confidential)	Weida, Jason	miriam grossman;Tamayo, Josefine;<mjajil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>	miriam grossman	Tamayo, Josefine;<mjajil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>
157	AHCA0226991	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.	7/25/2022 9:02 AM	RE: Yale (Privileged & Confidential)	Gary V. Perko	""Weida"" "" Jason;<Josefine.Tamayo@ahca.myflorida.com>;Tamayo, Josefine;Mohammad O. Jazil	""Weida"" "" Jason;<Josefine.Tamayo@ahca.myflorida.com>	Tamayo, Josefine;Mohammad O. Jazil
158	AHCA0226994	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.	7/25/2022 9:13 AM	RE: Yale (Privileged & Confidential)	Weida, Jason	Gary V. Perko;Tamayo, Josefine;Mohammad O. Jazil	Gary V. Perko	Tamayo, Josefine;Mohammad O. Jazil
159	AHCA0226998	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.	7/25/2022 9:16 AM	RE: Yale (Privileged & Confidential)	Gary V. Perko	""Weida"" "" Jason;<Josefine.Tamayo@ahca.myflorida.com>;Tamayo, Josefine;Mohammad O. Jazil	""Weida"" "" Jason;<Josefine.Tamayo@ahca.myflorida.com>	Tamayo, Josefine;Mohammad O. Jazil
160	AHCA0227002	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.	7/25/2022 9:17 AM	RE: Yale (Privileged & Confidential)	Weida, Jason	Gary V. Perko;Tamayo, Josefine;Mohammad O. Jazil	Gary V. Perko	Tamayo, Josefine;Mohammad O. Jazil



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161	AHCA0227014	Pdf	Attorney-Client;Work-Product	Email exchange between General Counsel's Office and counsel concerning research and comments that may be used in litigation.	7/25/2022 9:23 AM	RE: Yale (Privileged & Confidential)	Tamayo, Josefina	Gary V. Perko;"Weida"; Jason;<Jason.Weida@ahca.myflorida.com>;Mohammad O. Jazil	Gary V. Perko;"Weida"; Jason;<Jason.Weida@ahca.myflorida.com>	Mohammad O. Jazil
162	AHCA0227019	Pdf	Attorney-Client;Work-Product	Email exchange between General Counsel's Office and counsel concerning research and comments that may be used in litigation.	7/25/2022 9:25 AM	RE: Yale (Privileged & Confidential)	Gary V. Perko	""Tamayo"";""Josefina;""Weida""; Jason;<Jason.Weida@ahca.myflorida.com>;Mohammad O. Jazil	""Tamayo"";""Josefina;""Weida""; Jason;<Jason.Weida@ahca.myflorida.com>	Mohammad O. Jazil
163	AHCA0232369	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research that may be used in litigation.	7/28/2022 10:37 AM	Privileged & Confidential	Weida, Jason	Mohammad O. Jazil;<gperko@holtzmanvogel.com>;Tamayo, Josefina;Sheeran, Andrew;Grantham, Shena;Kellum, Kim	Mohammad O. Jazil;<gperko@holtzmanvogel.com>	Tamayo, Josefina;Sheeran, Andrew;Grantham, Shena;Kellum, Kim
164	AHCA0232370	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research that may be used in litigation.						
165	AHCA0232381	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between AHCA Assistant Deputy Secretary for Medicaid and counsel concerning research that may be used in litigation.						
166	AHCA0242768	Pdf	Attorney-Client	Email exchange between AHCA Program Administrator and counsel concerning written comments on Proposed Rule 59G-1.050.	8/1/2022 9:13 AM	RE: PRIVILEGED & CONFIDENTIAL - ATTORNEY WORK PRODUCT	Giering, Cole	Gary V. Perko;Weida, Jason	Gary V. Perko	Weida, Jason
167	AHCA0242769	Pdf	Attorney-Client	Attachment to email exchange between AHCA Program Administrator and counsel concerning written comments on Proposed Rule 59G-1.050.	7/9/2022 3:18 PM	Comment: Proposal Amending Rule 59G-1.050, General Medicaid Policy	Jon Harris Maurer	MEDICAID RULE COMMENTS	MEDICAID RULE COMMENTS	
168	AHCA0242770	Pdf	Attorney-Client	Attachment to email exchange between AHCA Program Administrator and counsel concerning written comments on Proposed Rule 59G-1.050.						
169	AHCA0243143	Pdf	Attorney-Client	Email exchange between AHCA Public Records Office and General Counsel's Office re: draft response to records request.	8/1/2022 1:40 PM	349948 public records request review	Gavins, Alexandra	""George"";""Tracy;""Tamayo""; Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	""George"";""Tracy;""Tamayo""; Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
170	AHCA0243144	Pdf	Attorney-Client	Attachment to email exchange between AHCA Public Records Office and General Counsel's Office re: draft response to records request.						
171	AHCA0243300	Pdf	Attorney-Client;Work-Product	Email exchange between AHCA General Counsel's Office counsel re: adoption packet for Rule 59G-1.050.	8/1/2022 2:02 PM	FW: Adoption Packet for 59G-1.050 [PRIVILEGED & CONFIDENTIAL]	Tamayo, Josefina	""Grantham"";""Shena;""Kellum""; Kim;<Kim.Kellum@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>;Sheeran, Andrew	""Grantham"";""Shena;""Kellum""; Kim;<Kim.Kellum@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	Sheeran, Andrew
172	AHCA0243332	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office counsel re: legal inquiry concerning public records request response.	8/1/2022 2:20 PM	FW: 349948 public records request review	George, Tracy	""Grantham"";""Shena;""Tamayo""; Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	""Grantham"";""Shena;""Tamayo""; Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	
173	AHCA0243333	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office counsel re: legal inquiry concerning public records request response.						
174	AHCA0243949	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 9:34 AM	FW: Public Records Daily Log	George, Tracy	""Helton"";""Joseph;""Tamayo"";""Josefina;""Grantham"";""Shena;""Kellum"";""Kim;""Hoeler"";""Thomas;<Thomas.Hoeler@ahca.myflorida.com>;<Josefina.Tamayo@ahca.myflorida.com>	""Helton"";""Joseph;""Tamayo"";""Josefina;""Grantham"";""Shena;""Kellum"";""Kim;""Hoeler"";""Thomas;<Thomas.Hoeler@ahca.myflorida.com>;<Josefina.Tamayo@ahca.myflorida.com>	

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175	AHCA0243956	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 9:37 AM	RE: Public Records Daily Log	Gavins, Alexandra	""George"" , "" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" , "" Tracy;<Tracy.George@ahca.myflorida.com>	
176	AHCA0243964	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 10:03 AM	RE: Public Records Daily Log	George, Tracy	""Gavins"" , "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	""Gavins"" , "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
177	AHCA0243972	Pdf	Attorney-Client;Work-Product	Email between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 10:15 AM	Experts in Arizona case	Gary V. Perko	""Weida"" , "" Jason;Mohammad O. Jazil;<Jason.Weida@ahca.myflorida.com>	""Weida"" , "" Jason;Mohammad O. Jazil;<Jason.Weida@ahca.myflorida.com>	
178	AHCA0243973	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.						
179	AHCA0243991	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.						
180	AHCA0244061	Pdf	Attorney-Client;Work-Product	Email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 10:19 AM	RE: Experts in Arizona case	Weida, Jason	Gary V. Perko;Mohammad O. Jazil	Gary V. Perko;Mohammad O. Jazil	
181	AHCA0244063	Pdf	Attorney-Client;Work-Product	Email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 10:23 AM	RE: Experts in Arizona case	Gary V. Perko	""Weida"" , "" Jason;Mohammad O. Jazil;<Jason.Weida@ahca.myflorida.com>	""Weida"" , "" Jason;Mohammad O. Jazil;<Jason.Weida@ahca.myflorida.com>	
182	AHCA0244065	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 10:39 AM	RE: Public Records Daily Log	Gavins, Alexandra	""George"" , "" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" , "" Tracy;<Tracy.George@ahca.myflorida.com>	
183	AHCA0244073	Pdf	Attorney-Client;Work-Product	Email between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding analysis of caselaw in anticipation of litigation.	8/2/2022 10:48 AM	UK Decision	Gary V. Perko	""Weida"" , "" Jason;Mohammad O. Jazil;<Jason.Weida@ahca.myflorida.com>	""Weida"" , "" Jason;Mohammad O. Jazil;<Jason.Weida@ahca.myflorida.com>	
184	AHCA0244074	Pdf	Attorney-Client;Work-Product	Attachment to email between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis in anticipation of litigation.						
185	AHCA0244113	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 11:00 AM	FW: Public Records Daily Log	Gavins, Alexandra	""George"" , "" Tracy;"" Tamayo"" , "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	""George"" , "" Tracy;"" Tamayo"" , "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
186	AHCA0244121	Pdf	Attorney-Client;Work-Product	Email between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 11:00 AM	RE: UK Decision	Mohammad O. Jazil	Gary V. Perko;""Weida"" , "" Jason;<Jason.Weida@ahca.myflorida.com>	Gary V. Perko;""Weida"" , "" Jason;<Jason.Weida@ahca.myflorida.com>	
187	AHCA0244123	Pdf	Attorney-Client;Work-Product	Email between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 11:25 AM	RE: UK Decision	Gary V. Perko	Mohammad O. Jazil;""Weida"" , "" Jason;<Jason.Weida@ahca.myflorida.com>	Mohammad O. Jazil;""Weida"" , "" Jason;<Jason.Weida@ahca.myflorida.com>	
188	AHCA0244125	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office counsel re: legal review of public records request responses.	8/2/2022 11:28 AM	FW: Public Records Daily Log	Tamayo, Josefina	""George"" , "" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" , "" Tracy;<Tracy.George@ahca.myflorida.com>	
189	AHCA0244139	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 12:18 PM	RE: Public Records Daily Log	George, Tracy	Tamayo, Josefina;Gavins, Alexandra	Tamayo, Josefina;Gavins, Alexandra	
190	AHCA0244147	Pdf	Attorney-Client;Work-Product	Email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid regarding legal analysis and expert testimony in anticipation of litigation.	8/2/2022 12:27 PM	RE: Experts in Arizona case	Gary V. Perko	""Weida"" , "" Jason;Mohammad O. Jazil;<Jason.Weida@ahca.myflorida.com>	""Weida"" , "" Jason;Mohammad O. Jazil;<Jason.Weida@ahca.myflorida.com>	

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191	AHCA0244159	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 1:22 PM	RE: Public Records Daily Log	Gavins, Alexandra	""George"" "" Tracy," "Tamayo"" "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	""George"" "" Tracy," "Tamayo"" "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
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.George@ahca.myflorida.com>	""George"" "" Tracy," "Tamayo"" "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
193	AHCA0244177	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 2:52 PM	RE: Public Records Daily Log	George, Tracy	Gavins, Alexandra;Tamayo, Josefina	Gavins, Alexandra;Tamayo, Josefina	
194	AHCA0244186	Pdf	Attorney-Client	Email exchange between AHCA General 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>	""Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
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>	""George"" "" Tracy;<Tracy.George@ahca.myflorida.com>	
196	AHCA0244198	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and AHCA Public Records Office re: pending public records requests.	8/3/2022 8:24 AM	RE: Information Needed in the Morning	George, Tracy	""Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	""Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
197	AHCA0244200	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office counsel re: pending public records requests.	8/3/2022 8:33 AM	Pending Public Records Requests related to proposed rule 59G-1.050	George, Tracy	""Tamayo"" "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	""Tamayo"" "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
198	AHCA0244205	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office counsel re: pending public records requests.	8/3/2022 8:34 AM	Fwd: Pending Public Records Requests related to proposed rule 59G-1.050	Tamayo, Josefina	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
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>	""George"" "" Tracy;<Tracy.George@ahca.myflorida.com>	
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>;Tamayo, Josefina;Hoeler, Thomas	""Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>;Tamayo, Josefina;Hoeler, Thomas	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>	""George"" "" Tracy," "Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
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@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	""Tamayo"" "" Josefina;" "Sheeran"" "" Andrew;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
203	AHCA0244239	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office counsel re: legal review of public records request responses.	8/3/2022 10:23 AM	RE: Public Records Daily Log	George, Tracy	""Hoeler"" "" Thomas;<Thomas.Hoeler@ahca.myflorida.com>	""Hoeler"" "" Thomas;<Thomas.Hoeler@ahca.myflorida.com>	
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.Sheeran@ahca.myflorida.com>	""Weida"" "" Jason," "Sheeran"" "" Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
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@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	""Tamayo"" "" Josefina;" "Sheeran"" "" Andrew;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	

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206	AHCA0244529	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 3:45 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.Sheeran@ahca.myflorida.com>	""Weida"" "" Jason," "Sheeran"" "" Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
207	AHCA0244532	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 3:46 PM	RE: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Weida, Jason	""Tamayo"" "" Josefina," "Sheeran"" "" Andrew;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	""Tamayo"" "" Josefina," "Sheeran"" "" Andrew;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
208	AHCA0244535	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 3:47 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.Sheeran@ahca.myflorida.com>	""Weida"" "" Jason," "Sheeran"" "" Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
209	AHCA0244547	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 5:09 PM	RE: Board of Medicine - The Florida Department of Health's Petition to Initiate Rulemaking	Weida, Jason	""Tamayo"" "" Josefina," "Sheeran"" "" Andrew;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	""Tamayo"" "" Josefina," "Sheeran"" "" Andrew;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
210	AHCA0244550	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 5:27 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.Sheeran@ahca.myflorida.com>	""Weida"" "" Jason," "Sheeran"" "" Andrew;<Jason.Weida@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
211	AHCA0244617	Pdf	Attorney-Client	Email between AHCA General Counsel, Chief of Staff, and Secretary regarding public event invitation.	8/3/2022 7:16 PM	FW: Invitation to Florida Surgeon General	Marstiller, Simone	""Tamayo"" "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	""Tamayo"" "" Josefina;<Josefina.Tamayo@ahca.myflorida.com>	
212	AHCA0245079	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/4/2022 10:34 AM	RE: Information Needed in the Morning	George, Tracy	""Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>;Tamayo, Joseffina;Sheeran, Andrew	""Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	Tamayo, Josefina;Sheeran, Andrew
213	AHCA0245083	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/4/2022 12:11 PM	RE: Information Needed in the Morning	Gavins, Alexandra	""George"" "" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" "" Tracy;<Tracy.George@ahca.myflorida.com>	
214	AHCA0245128	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/4/2022 1:26 PM	RE: Information Needed in the Morning	George, Tracy	""Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	""Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
215	AHCA0245133	Pdf	Attorney-Client;Work-Product	Email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid and General Counsel's Office with legal analysis in anticipation of litigation.	8/4/2022 3:02 PM	PRIVILEGED & CONFIDENTIAL ATTORNEY WORK PRODUCT	Gary V. Perko	""Tamayo"" "" Josefina," "Weida"" "" Jason," "Sheeran"" "" Andrew," "Grantham"" "" Shena;<Josefina.Tamayo@ahca.myflorida.com>;Mohammad O. Jazil;Michael	""Tamayo"" "" Josefina," "Weida"" "" Jason," "Sheeran"" "" Andrew," "Grantham"" "" Shena;<Josefina.Tamayo@ahca.myflorida.com>	Mohammad O. Jazil;Michael
216	AHCA0245134	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between counsel and AHCA Assistant Deputy Secretary for Medicaid and General Counsel's Office with legal analysis in anticipation of litigation.						
217	AHCA0245168	Pdf	Attorney-Client;Work-Product	Email exchange between counsel in AHCA General Counsel's Office with counsel's legal analysis in anticipation of litigation.	8/4/2022 3:10 PM	FW: PRIVILEGED & CONFIDENTIAL - ATTORNEY WORK PRODUCT	Tamayo, Josefina	""Kellum"" "" Kim," "Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	""Kellum"" "" Kim," "Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com>	
218	AHCA0245169	Pdf	Attorney-Client;Work-Product	Attachment to email exchange between counsel in AHCA General Counsel's Office with counsel's legal analysis in anticipation of litigation.						
219	AHCA0245200	Pdf	Attorney-Client;Work-Product	Email from AHCA General Counsel's Office to General Counsel for Florida Department of Health re: caselaw in anticipation of litigation.	8/4/2022 3:12 PM	Case law Update	Tamayo, Josefina	<john.wilson@flhealth.gov>	<john.wilson@flhealth.gov>	

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220	AHCA0245201	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA General Counsel's Office to General Counsel for Florida Department of Health re: caselaw in anticipation of litigation.						
221	AHCA0245231	Pdf	Attorney-Client;Work-Product	Email from AHCA General Counsel's Office to EOG counsel re: caselaw in anticipation of litigation.	8/4/2022 3:13 PM	Case Law Update	Tamayo, Josefina	""Furino"" Maureen;<maureen.furino@eog.myflorida.com>	""Furino"" Maureen;<maureen.furino@eog.myflorida.com>	
222	AHCA0245232	Pdf	Attorney-Client;Work-Product	Attachment to email from AHCA General Counsel's Office to EOG counsel re: caselaw in anticipation of litigation.						
223	AHCA0246875	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/9/2022 8:41 AM	RE: Public Records Daily Log	Gavins, Alexandra	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	
224	AHCA0246883	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/9/2022 9:26 AM	RE: Public Records Daily Log	George, Tracy	Gavins, Alexandra;Hoeler, Thomas;Tamayo, Josefina	Gavins, Alexandra;Hoeler, Thomas;Tamayo, Josefina	
225	AHCA0246938	Excel	Attorney-Client	Attachment to email regarding status updates of public records and media requests; request tracker.						
226	AHCA0246939	Excel	Attorney-Client	Attachment to email regarding status updates of public records and media requests; request tracker.						
227	AHCA0246940	Excel	Attorney-Client	Attachment to email regarding status updates of public records and media requests; request tracker.						
228	AHCA0246941	Excel	Attorney-Client	Attachment to email regarding status updates of public records and media requests; request tracker.						
229	AHCA0246942	Excel	Attorney-Client	Attachment to email regarding status updates of public records and media requests; request tracker.						
230	AHCA0246970	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office, Public Records Office, and Deputy Secretary for Medicaid re: public records request.	8/9/2022 11:34 AM	Public Records Request	George, Tracy	""Wallace"" J.;<Thomas.Wallace@ahca.myflorida.com>;Tamayo, Josefina;Kellum, Kim;Sheeran, Andrew;Weida, Jason	""Wallace"" J.;<Thomas.Wallace@ahca.myflorida.com>	Tamayo, Josefina;Kellum, Kim;Sheeran, Andrew;Weida, Jason
231	AHCA0247295	Pdf	Attorney-Client	Email exchange between Medicaid Data Analytics and Deputy Secretary for Medicaid re: questions from General Counsel's Office about public records request.	8/10/2022 11:52 AM	FW: Public Records Request	Wallace, Thomas J.	""Barry"" Joycee;<Joycee.Barry@ahca.myflorida.com>	""Barry"" Joycee;<Joycee.Barry@ahca.myflorida.com>	
232	AHCA0247296	Pdf	Attorney-Client	Attachment to email exchange between Medicaid Data Analytics and Deputy Secretary for Medicaid re: questions 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,Michael James	PublicRecordsReq	Haller,Michael James
233	AHCA0247297	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/10/2022 12:33 PM	FW: Public Records Daily Log	Gavins, Alexandra	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	
234	AHCA0247320	Pdf	Attorney-Client	Email exchange between Medicaid Data Analytics and Deputy Secretary for Medicaid re: questions from General Counsel's Office about public records request.	8/10/2022 12:47 PM	Fwd: Public Records Request	Barry, Joycee	""Creel"" Victoria;<Victoria.Creel@ahca.myflorida.com>	""Creel"" Victoria;<Victoria.Creel@ahca.myflorida.com>	
235	AHCA0247321	Pdf	Attorney-Client	Attachment to email exchange between Medicaid Data Analytics and Deputy Secretary for Medicaid re: questions 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,Michael James	PublicRecordsReq	Haller,Michael James
236	AHCA0247336	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/10/2022 1:59 PM	35062 review	Gavins, Alexandra	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	
237	AHCA0247337	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.						

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238	AHCA0247430	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/10/2022 2:18 PM	Response to Public Records Request - CorFlow #350062	George, Tracy	""Tamayo"" "" Josefine;" "Juarez"" "" Brock;" "Gavins"" "" Alexandra;<Brock.Juarez@ahca.myflorida.com>;<Alexandra.Gavins@ahca.myflorida.com>	""Tamayo"" "" Josefine;" "Juarez"" "" Brock;" "Gavins"" "" Alexandra;<Brock.Juarez@ahca.myflorida.com>;<Alexandra.Gavins@ahca.myflorida.com>	
239	AHCA0247432	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.						
240	AHCA0247539	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/10/2022 3:08 PM	FW: Response to Public Records Request - CorFlow #350062	Gavins, Alexandra	""Colson"" "" Max;<Max.Colson@ahca.myflorida.com>	""Colson"" "" Max;<Max.Colson@ahca.myflorida.com>	
241	AHCA0247541	Pdf	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.						
242	AHCA0247742	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: pending public records requests.	8/10/2022 4:55 PM	records requests	Gavins, Alexandra	""George"" "" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" "" Tracy;<Tracy.George@ahca.myflorida.com>	
243	AHCA0247743	Excel	Attorney-Client	Attachment to email exchange between AHCA General Counsel's Office and Public Records Office re: pending public records requests.						
244	AHCA0247749	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/11/2022 9:34 AM	FW: Public Records Daily Log	Gavins, Alexandra	""George"" "" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" "" Tracy;<Tracy.George@ahca.myflorida.com>	
245	AHCA0247760	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/11/2022 9:45 AM	FW: Public Records Daily Log	George, Tracy	Gavins, Alexandra;Hoeler, Thomas	Gavins, Alexandra;Hoeler, Thomas	
246	AHCA0247769	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: legal review of public records request responses.	8/11/2022 10:17 AM	RE: Public Records Daily Log	Hoeler, Thomas	""George"" "" Tracy;" "Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	""George"" "" Tracy;" "Gavins"" "" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
247	AHCA0247782	Pdf	Attorney-Client	Email exchange between AHCA General Counsel's Office and Public Records Office re: pending public records requests.	8/11/2022 1:41 PM	FW: records requests	George, Tracy	""Belmont"" "" Catherine;<Catherine.Belmont@ahca.myflorida.com>	""Belmont"" "" Catherine;<Catherine.Belmont@ahca.myflorida.com>	
248	AHCA0247783	Excel	Attorney-Client	Internal notes and tracker for Agency media responses.						
249	AHCA0259805	Pdf	Attorney-Client	Email between General Counsel's Office regarding Senator Book's AHCA Rule Letter.	8/15/2022 10:35 AM	FW: Letter from Senate Minority Leader Book	Tamayo, Josefine	""Kellum"" "" Kim;" "Grantham"" "" Shena;<Kim.Kellum@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>;Sheeran, Andrew	""Kellum"" "" Kim;" "Grantham"" "" Shena;<Kim.Kellum@ahca.myflorida.com>;<Shena.Grantham@ahca.myflorida.com>	Sheeran, Andrew
250	AHCA0259806	Pdf	Attorney-Client	Attachment to email between General Counsel's Office regarding Senator Book's AHCA Rule Letter.						
251	AHCA0260387	Pdf	Attorney-Client	Email between Chief of Staff and General Counsel regarding ADF's request for interview.	8/15/2022 3:01 PM	FW: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Weida, Jason	""Tamayo"" "" Josefine;<Josefine.Tamayo@ahca.myflorida.com>	""Tamayo"" "" Josefine;<Josefine.Tamayo@ahca.myflorida.com>	
252	AHCA0260443	Pdf	Attorney-Client	Email between Chief of Staff and General Counsel regarding ADF's request for interview.	8/16/2022 6:28 AM	Re: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Tamayo, Josefine	""Weida"" "" Jason;<Jason.Weida@ahca.myflorida.com>	""Weida"" "" Jason;<Jason.Weida@ahca.myflorida.com>	
253	AHCA0260446	Pdf	Attorney-Client;Work-Product	Email between Chief of Staff and General Counsel regarding ADF's request for interview.	8/16/2022 6:45 AM	Fwd: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Tamayo, Josefine	""Marstiller"" "" Simone;<Simone.Marstiller@ahca.myflorida.com>	""Marstiller"" "" Simone;<Simone.Marstiller@ahca.myflorida.com>	
254	AHCA0260718	Pdf	Attorney-Client	Email between AHCA General Counsel and EOG General Counsel's Office regarding ADF's request for interview.	8/16/2022 7:49 AM	Fwd: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Tamayo, Josefine	""Clemmons-Haire"" "" Mary;<Mary.Haire@ahca.myflorida.com>	""Clemmons-Haire"" "" Mary;<Mary.Haire@ahca.myflorida.com>	
255	AHCA0260721	Pdf	Attorney-Client	Email between AHCA General Counsel's Office regarding ADF's request for interview.	8/16/2022 8:07 AM	RE: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Clemmons-Haire, Mary	""Tamayo"" "" Josefine;<Josefine.Tamayo@ahca.myflorida.com>	""Tamayo"" "" Josefine;<Josefine.Tamayo@ahca.myflorida.com>	

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256	AHCA0260724	Pdf	Attorney-Client	Email between AHCA General Counsel's Office regarding ADF's request for interview.	8/16/2022 8:08 AM	Re: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Tamayo, Josefina	""Clemmons-Haire"" Mary;<Mary.Haire@ahca.myflorida.com>	""Clemmons-Haire"" Mary;<Mary.Haire@ahca.myflorida.com>	
257	AHCA0260917	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel and EOG General Counsel's Office regarding ADF request to interview Chief of Staff.	8/16/2022 9:48 AM	FW: ADF Celebration of Promise to America's Parents (Privileged & Confidential)	Tamayo, Josefina	""Furino"" Maureen;<maureen.furino@eog.myflorida.com>	""Furino"" Maureen;<maureen.furino@eog.myflorida.com>	
258	AHCA0262301	Pdf	Attorney-Client;Work-Product	Email between Holtzman Vogel and Chief of Staff regarding court order in litigation.	8/16/2022 2:19 PM	ATTORNEY WORK PRODUCT	Gary V. Perko	""Weida"" Jason;<Jason.Weida@ahca.myflorida.com>	""Weida"" Jason;<Jason.Weida@ahca.myflorida.com>	
259	AHCA0262302	Pdf	Attorney-Client;Work-Product	Attachment to email between Holtzman Vogel and Chief of Staff regarding court order in litigation.						
260	AHCA0263186	Pdf	Attorney-Client	Email between Public Records and T. George regarding outstanding records requests and media requests.	8/17/2022 9:56 AM		Gavins, Alexandra	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	
261	AHCA0263187	Excel	Attorney-Client	Attachment to email between Public Records and T. George regarding outstanding records requests and media requests.						
262	AHCA0264995	Pdf	Attorney-Client	Email between General Counsel staff and public records regarding outstanding records and media requests.	8/17/2022 11:04 AM	FW: records requests	Belmont, Catherine	""Gavins"" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	""Gavins"" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
263	AHCA0264997	Excel	Attorney-Client	Attachment to email between General Counsel staff and public records regarding outstanding records and media requests; media tracker.						
264	AHCA0266505	Pdf	Work-Product	Email between General Counsel staff regarding staff duties for media response.	8/18/2022 2:27 PM	RE: Draft memo	Grantham, Shena	""Clemmons-Haire"" Mary;<Mary.Haire@ahca.myflorida.com>	""Clemmons-Haire"" Mary;<Mary.Haire@ahca.myflorida.com>	
265	AHCA0267158	Pdf	Attorney-Client	Email between General Counsel staff regarding public records requests.	8/22/2022 1:42 PM	RE: Public Records Daily Log	Gavins, Alexandra	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	
266	AHCA0267173	Pdf	Attorney-Client	Email between General Counsel staff regarding public records requests.	8/22/2022 2:15 PM	RE: Public Records Daily Log	George, Tracy	""Gavins"" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	""Gavins"" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
267	AHCA0267200	Pdf	Attorney-Client	Email between General Counsel staff regarding public records requests.	8/22/2022 3:08 PM	status check of records requests	Gavins, Alexandra	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	
268	AHCA0267201	Excel	Attorney-Client	Attachment to email between General Counsel staff regarding public records requests; request tracker.						
269	AHCA0267288	Pdf	Attorney-Client	Email between General Counsel staff regarding public records requests.	8/23/2022 1:09 PM	RE: public records	Gavins, Alexandra	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	""George"" Tracy;<Tracy.George@ahca.myflorida.com>	
270	AHCA0267289	Excel	Attorney-Client	Attachment to email between General Counsel staff regarding public records requests; request tracker.						
271	AHCA0267290	Pdf	Attorney-Client	Email between General Counsel staff regarding public records requests.	8/23/2022 1:14 PM	FW: public records	George, Tracy	""Gavins"" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	""Gavins"" Alexandra;<Alexandra.Gavins@ahca.myflorida.com>	
272	AHCA0267292	Excel	Attorney-Client	Attachment to email between General Counsel staff regarding public records requests; request tracker.						
273	AHCA0267296	Pdf	Attorney-Client	Email between General Counsel staff regarding public records requests.	8/23/2022 1:21 PM	RE: Public Records Request	George, Tracy	""Tamayo"" ""Josefina,"" ""Sheeran"" Andrew;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	""Tamayo"" ""Josefina,"" ""Sheeran"" Andrew;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	
274	AHCA0267300	Excel	Attorney-Client	Attachment to email between General Counsel staff regarding public records requests; request tracker.						
275	AHCA0273234	Pdf	Attorney-Client;Work-Product	Email between General Counsel's Office and Chief of Staff regarding recent court order.	8/25/2022 1:08 PM	Privileged & Confidential	Weida, Jason	""Tamayo"" ""Josefina,"" ""Sheeran"" Andrew;<gperko@holtzmanvogel.com>;<mjazel@holtzmanvogel.com>;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	""Tamayo"" ""Josefina,"" ""Sheeran"" Andrew;<gperko@holtzmanvogel.com>;<mjazel@holtzmanvogel.com>;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>	



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276	AHCA0273235	Pdf	Attorney-Client;Work-Product	Attachment to email between General Counsel's Office and Chief of Staff regarding recent court order; court order.						
277	AHCA0273246	Pdf	Attorney-Client;Work-Product	Email between General Counsel's Office and Chief of Staff regarding recent court order.	8/25/2022 1:08 PM		Weida, Jason	Jason Weida	Jason Weida	
278	AHCA0273247	Pdf	Attorney-Client;Work-Product	Attachment to email between General Counsel's Office and Chief of Staff regarding recent court order; court order.						
279	AHCA0273305	Pdf	Attorney-Client;Work-Product	Email between General Counsel's Office and outside counsel regarding litigation.	8/25/2022 6:06 PM	FW: Data File (Privileged & Confidential)	Weida, Jason	""Sheeran"" "" Andrew;<gperko@holtzmanvogel.com>;<mjazil@holtzmanvogel.com>;<Andrew.Sheeran@ahca.myflorida.com>	""Sheeran"" "" Andrew;<gperko@holtzmanvogel.com>;<mjazil@holtzmanvogel.com>;<Andrew.Sheeran@ahca.myflorida.com>	
280	AHCA0273307	Excel	Attorney-Client;Work-Product	Attachment to email between General Counsel's Office and outside counsel regarding litigation.						
281	AHCA0274220	Pdf	Attorney-Client;Work-Product	Email between General Counsel's Office, AHCA Chief of Staff, and outside counsel regarding litigation.	8/26/2022 8:45 AM	RE: Data File (Privileged & Confidential)	Sheeran, Andrew	""Weida"" "" Jason;<gperko@holtzmanvogel.com>;<mjazil@holtzmanvogel.com>;<Jason.Weida@ahca.myflorida.com>	""Weida"" "" Jason;<gperko@holtzmanvogel.com>;<mjazil@holtzmanvogel.com>;<Jason.Weida@ahca.myflorida.com>	
282	AHCA0275213	Pdf	Attorney-Client;Work-Product	Email between General Counsel's Office, AHCA Chief of Staff, and outside counsel regarding litigation.	8/26/2022 12:42 PM	RE: Data File (Privileged & Confidential)	Weida, Jason	""Sheeran"" "" Andrew;<gperko@holtzmanvogel.com>;<mjazil@holtzmanvogel.com>	""Sheeran"" "" Andrew;<gperko@holtzmanvogel.com>;<mjazil@holtzmanvogel.com>	
283	AHCA0275215	Pdf	Attorney-Client;Work-Product	Attachment to email between General Counsel's Office, AHCA Chief of Staff, and outside counsel regarding litigation.						
284	AHCA0277154	Pdf	Attorney-Client	Email between General Counsel's Office and Public Records regarding outstanding requests.	8/29/2022 7:41 AM	Public Records requests currently open as of August 29, 2022	Gavins, Alexandra	Smoak, Kimberly;Wallace, Thomas J.;George, Tracy;Templeton, Mary Gay;Sokoloski, Kristin	Smoak, Kimberly;Wallace, Thomas J.	George, Tracy;Templeton, Mary Gay;Sokoloski, Kristin
285	AHCA0277155	Excel	Attorney-Client	Notes and request tracker.						
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.						
289	AHCA0285275	Pdf	Work-Product	Email between outside counsel and 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	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>;Gary V. Perko	""Sheeran"" "" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	Gary V. Perko
290	AHCA0285277	Pdf	Work-Product	Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.						
291	AHCA0285280	Pdf	Work-Product	Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.						
292	AHCA0285285	Pdf	Work-Product	Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	9/2/2022 3:24 PM	FW: PRIVILEGED & CONFIDENTIAL - Section 119.071(1)(d)1. F.S.	Sheeran, Andrew	""Weida"" "" Jason;" "George"" "" Tracy;<Jason.Weida@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	""Weida"" "" Jason;" "George"" "" Tracy;<Jason.Weida@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	
293	AHCA0285287	Pdf	Work-Product	Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.						
294	AHCA0285290	Pdf	Work-Product	Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.						
295	AHCA0285295	Pdf	Work-Product	Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	9/2/2022 4:03 PM	RE: PRIVILEGED & CONFIDENTIAL - Section 119.071(1)(d)1. F.S.	Weida, Jason	""Sheeran"" "" Andrew;" "George"" "" Tracy;<Andrew.Sheeran@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	""Sheeran"" "" Andrew;" "George"" "" Tracy;<Andrew.Sheeran@ahca.myflorida.com>;<Tracy.George@ahca.myflorida.com>	



	A	B	C	D	E	F	G	H	I	J
296	AHCA0295177	Pdf	Attorney-Client;Work-Product	Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.	9/7/2022 11:42 AM	PRIVILEGED & CONFIDENTIAL	Weida, Jason	<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>;"Sheeran"" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>;"Sheeran"" Andrew;<Andrew.Sheeran@ahca.myflorida.com>	
297	AHCA0295178	Pdf	Attorney-Client;Work-Product	Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.						
298	AHCA0295263	Pdf	Attorney-Client;Work-Product	Attachment and notes to Email between outside counsel and AHCA general Counsel's Office regarding ongoing litigation.						
299	AHCA0295265	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel's Office and EOG General Counsel's Office regarding lawsuit.	9/7/2022 11:45 AM	Fwd: PRIVILEGED & CONFIDENTIAL	Sheeran, Andrew	<Maureen.furino@eog.myflorida.com>	<Maureen.furino@eog.myflorida.com>	
300	AHCA0295266	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA General Counsel's Office and EOG General Counsel's Office regarding lawsuit.						
301	AHCA0295351	Pdf	Attorney-Client;Work-Product	Attachment to Email between AHCA General Counsel's Office and EOG General Counsel's Office regarding lawsuit.						
302	AHCA0295353	Pdf	Attorney-Client;Work-Product	Email between AHCA General Counsel and Secretary regarding ongoing litigation.	9/7/2022 11:59 AM	Fwd: PRIVILEGED & CONFIDENTIAL	Sheeran, Andrew	Marstiller, Simone;Wallace, Thomas J.;Farrill, Cody;Weida, Jason	Marstiller, Simone;Wallace, Thomas J.;Farrill, Cody	Weida, Jason
303	AHCA0295354	Pdf	Attorney-Client;Work-Product	Attachment to email between AHCA General Counsel and Secretary regarding ongoing litigation.						
304	AHCA0295439	Pdf	Attorney-Client;Work-Product	Attachment to email between AHCA General Counsel and Secretary regarding ongoing litigation.						