

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,¹ 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

¹ 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, 41:²

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

² 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.³ *See* Fla. Stat. §120.54(c)(1) (“any

³ 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).⁴ 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

⁴ 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,

**PILLSBURY WINTHROP SHAW
PITTMAN, LLP**

Jennifer Altman (Fl. Bar No. 881384)
Shani Rivaux (Fl. Bar No. 42095)
600 Brickell Avenue, Suite 3100
Miami, FL 33131
(786) 913-4900
jennifer.altman@pillsbury.com
shani.rivaux@pillsbury.com

William C. Miller*
Gary J. Shaw*
1200 17th Street N.W.
Washington, D.C. 20036
(202) 663-8000
william.c.miller@pillsburylaw.com

Joe Little*
500 Capitol Mall, Suite 1800
Sacramento, CA 95814
(916) 329-4700
joe.little@pillsburylaw.com

NATIONAL HEALTH LAW PROGRAM

Abigail Coursole*
3701 Wilshire Boulevard, Suite 315
Los Angeles, CA 90010

/s/ Omar Gonzalez-Pagan
**LAMBDA LEGAL DEFENSE
AND EDUCATION FUND, INC.**

Omar Gonzalez-Pagan*
120 Wall Street, 19th Floor
New York, NY 10005
(212) 809-8585
ogonzalez-pagan@lambdalegal.org

Carl S. Charles*
1 West Court Square, Suite 105
Decatur, GA 30030
(404) 897-1880
ccharles@lambdalegal.org

SOUTHERN LEGAL COUNSEL, INC.

Simone Chriss (Fl. Bar No. 124062)
Chelsea Dunn (Fl. Bar No. 1013541)
1229 NW 12th Avenue
Gainesville, FL 32601
(352) 271-8890
Simone.Chriss@southernlegal.org
Chelsea.Dunn@southernlegal.org

FLORIDA HEALTH JUSTICE PROJECT

Katy DeBriere (Fl. Bar No. 58506)
3900 Richmond Street

(310) 736-1652
coursolle@healthlaw.org

Catherine McKee*
1512 E. Franklin Street, Suite 110
Chapel Hill, NC 27541
(919) 968-6308
mckee@healthlaw.org

Jacksonville, FL 32205
(352) 278-6059
debriere@floridahealthjustice.org

** 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

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

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

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

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

Andre

Sent from my iPhone

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

Hi, Jason and team.

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

Andre

Sent from my iPhone

On Jul 19, 2022, at 12:33 PM, Weida, Jason <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
Bldg 3 Room 2413
+1 850-412-4118 (Office)
+1 850-228-1898 (Cell)

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 produce this document. Since the Parties disagree, we believe that it would make sense for us to submit the document for *in camera* review in order to get additional guidance. We welcome your thoughts though. We will also be discussing this issue further with our client to see whether the need to protect similar documents in future rulemakings outweighs the benefits of producing it here.

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

Michael Beato
Office: (850) 354-5645
mbeato@HoltzmanVogel.com // www.HoltzmanVogel.com



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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



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

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February 16, 2023

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Michael Beato, mbeato@holtzmanvogel.com

**Re: Privilege Assertions by Defendants
Dekker v. Weida, Case No. 4:22-cv-00325-RH-MAF (N.D. Fla.)**

Dear Counsel,

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

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

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

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

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

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

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

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

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

¹ 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 | Defendants' Amended Privilege Log | | | | | | | | | |
| 2 | Bates Number | Document Type | Privilege Tags | Privilege Note | Sent Date | Subject | From | Recipients | To | CC |
| 3 | AHCA0003348 | Pdf | Work-Product | Email between AHCA General Counsel staff regarding Medicare and Medicaid Decision Memo for Gender Dysphoria. | 1/5/2022 4:28 PM | Sending to you for future reference and to obtain latest version for you. | Bunton, Samuel | ""Sheeran"" "" Andrew;<Andrew.Sheeran@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"" Josefina;"Weida"" Jason;"Brackett"" Matt | Mohammad O. Jazil;Gary V. Perko;"Kellum"" Kim;"Grantham"" Shena;"Tamayo"" Josefina;"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"" Josefina;"Weida"" Jason;"Sheeran"" Andrew;"Grantham"" Shena | ""Tamayo"" Josefina;"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 | <mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>;"Weida"" Jason;"Sheeran"" Andrew;"Grantham","Shena;"Kellum"" Kim;"Giering"" Cole | <mjazil@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"" Josefina;<mjazil@holtzmanvogel.com>;<gperko@holtzmanvogel.com>;"Sheeran"" Andrew;"Grantham","Shena;"Kellum"" Kim;"Giering"" Cole;Zack | ""Tamayo"" Josefina;<mjazil@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"" Josefina;"Kellum"" Kim;"Sheeran"" Andrew;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com>;<Kim.Kellum@ahca.myflorida.com> | ""Tamayo"" Josefina;"Kellum"" Kim;"Sheeran"" Andrew;<Josefina.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"" Josefina;<Josefina.Tamayo@ahca.myflorida.com>;Sheeran, Andrew;Kellum, Kim | ""Tamayo"" Josefina;<Josefina.Tamayo@ahca.myflorida.com> | 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, Josefina;Sheeran, Andrew;Kellum, Kim | Tamayo, Josefina | 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"" "" Josefina," "Weida"" "" Jason," "Grantham"" "" Shena," "Sheeran"" "" Andrew;<Josefina.Tamayo@ahca.myflorida.com>;Mohammad O. Jazil | ""Tamayo"" "" Josefina," "Weida"" "" Jason," "Grantham"" "" Shena," "Sheeran"" "" Andrew;<Josefina.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, Josefina | 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, Josefina | ""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, Josefina | 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, Josefina;<mjajil@holtzmanvogel.com>;<gperko@holtzmanvogel.com> | miriam grossman | Tamayo, Josefina;<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;<Josefina.Tamayo@ahca.myflorida.com>;Tamayo, Josefina;Mohammad O. Jazil | ""Weida"" "" Jason;<Josefina.Tamayo@ahca.myflorida.com> | Tamayo, Josefina;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, Josefina;Mohammad O. Jazil | Gary V. Perko | Tamayo, Josefina;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;<Josefina.Tamayo@ahca.myflorida.com>;Tamayo, Josefina;Mohammad O. Jazil | ""Weida"" "" Jason;<Josefina.Tamayo@ahca.myflorida.com> | Tamayo, Josefina;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, Josefina;Mohammad O. Jazil | Gary V. Perko | Tamayo, Josefina;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;<Josefina.Tamayo@ahca.myflorida.com> | ""Tamayo"" "" Josefina," 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, Josefina;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 | 350062 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 - CorrFlow #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 - CorrFlow #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, Josefina | ""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, Josefina | ""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, Josefina | ""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, Josefina | ""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>;<mjzail@holtzmanvogel.com>;<Josefina.Tamayo@ahca.myflorida.com>;<Andrew.Sheeran@ahca.myflorida.com> | ""Tamayo"" ""Josefina,"" ""Sheeran"" Andrew;<gperko@holtzmanvogel.com>;<mjzail@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. | | | | | | |