

LUCAS SEIDMAN
Plaintiff

CASE No.: 26-CA-000617

VS

Hillsborough County Public School District
Defendant

Division: A

Plaintiff's Request For Production of Documents

In accordance with the Rules of Civil Procedure for the State of Florida, Rule 1.350, LUCAS SEIDMAN, as Plaintiff, appearing *in forma pauperis* and as Conductor of His own Cause pursuant to FSS 454.18, hereby requests to be transmitted to him electronically, served through his Email, as a collection of PDF files or mailed to his Address of Service in physical form, or in any manner that this Honorable Court shall hereinafter further direct or prescribe, the following documents relevant to these proceedings:

- 1) All employment records concerning Lucas Seidman
- 2) All records of proceedings against or actions taken against Lucas Seidman subsequent to arrest on 8/20/25, including transcripts or audio/video recordings of a meeting that took place 8/22/2025 in which Seidman was offered "termination or resignation" without Union representation present
- 3) All email correspondence with HCTA representatives concerning Lucas Seidman
- 4) All internal emails regarding Lucas Seidman
- 5) Hillsborough County Public School District's documented procedure for unilaterally revoking an individual contract staff member's parking "privilege"
- 6) Hillsborough County Public School District's documented procedure or training materials for district designees to search staff member conveyances
- 7) District documented procedure or training materials for district designees to search student conveyances

- 8) District documented procedures or training materials for district designees to search visitors, or other non-contract attendee or invitee conveyances
- 9) Copy of any memorandum of understanding or associated legally binding documents that govern the working relationship of Hillsborough County Sheriff's Department or other Law Enforcement and District Designees, especially when permanently embedded in district schools
- 10) Copy of any standing orders declaring a chain of command or order of ascension/successions on school grounds during normal work hours and after an emergency is declared, including form documents of all threat matrices, available procedures for threat neutralization by Site Managers or other policies or training materials that treat specifically or generally who is in charge and what specific steps will be followed if there is a threat to the "safety, welfare, or health" of our students, as defined by FDOE*
- 11) Documents highlighting the process of "initiating an investigation" of contract staff with Hillsborough Public Schools Investigators
- 12) Copies of any previously sealed Administrative Law proceedings, writs of mandamus from Courts of competent jurisdiction, anticipatory warrants, those issuing "continuous authorization", or similar warrants, as issued by a Court of Competent Jurisdiction, Executive Orders from The Governor of Florida or His qualified designee, Executive Orders from United States Agencies with the power to suspend civil rights or local laws temporarily, including the Office of The President of The United States, Federal Emergency Management Agency, or a similar Executive Authority of these United States or of the Great State of Florida, wherein it is specifically authorized for the Hillsborough County Public School District to formulate, write and publish its own firearms laws, consider its own policies ultra vires de lex terra, and/or otherwise suspend or hold null the laws of The State of Florida, or the substance of The Florida State Constitution, or the Constitution of these United States
- 13) Any document Defendant wishes Plaintiff to be in possession of that has bearing on the matter at hand

Items with a '*' indicate those documents which could be reasonably considered secretive or sensitive and their release into the public record damaging with respect to the safety of students. The safety of students being extremely important to all parties in this suit, a generalized form of anything so sensitive that it could damage

the safety procedures or protocols of district schools will be acceptable, with clear annotation for the satisfaction of the Court that such sensitivity warranted non-production of documents in the interest of student safety.

Made known here that a copy of this document has been furnished in digital form to all Defendant counsel of record at: jason.margolin@akerman.com, phillip.harris@akerman.com AND through Efile on 6th March, 2026.

Offered with respect to the Court in the light of Truth and in the pursuit of Justice,

A handwritten signature in black ink, appearing to be 'L Seidman', with a long horizontal stroke extending to the right.

Lucas Seidman
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Defendant, Conductor of His own Cause