



OFFICE OF THE ATTORNEY GENERAL  
STATE OF FLORIDA  
DEPARTMENT OF LEGAL AFFAIRS

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CONSUMER PROTECTION  
SUBPOENA DUCES TECUM

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**IN THE INVESTIGATION OF: ENVIRONMENTAL LAW INSTITUTE  
CLIMATE JUDICIARY PROJECT  
AG CASE NO: L26-3-1022**

**TO: THE ENVIRONMENTAL LAW INSTITUTE, INC.  
1730 M Street, NW, Suite 700  
Washington, D.C. 20036  
EIN: 52-0901863**

**c/o: Registered Agent  
Ninoska Diaz**



**THIS INVESTIGATIVE SUBPOENA DUCES TECUM** is issued pursuant to the Florida Deceptive and Unfair Trade Practices Act, Chapter 501, Part II, Florida Statutes, in the course and authority of an official investigation. Please note Sections 501.204, and 501.206, Florida Statutes (2025), attached hereto.

**YOU ARE HEREBY COMMANDED** to produce all documentary material and other tangible evidence as described herein, that is in your possession, custody, or control, or in the possession, custody, or control of your agents or employees, and to make it available for inspection and copying or reproduction before Tallahassee Bureau Chief Assistant Attorney General Tracy P. Moye on May 15, 2026, **at 9:00 a.m.** at the following location:

OFFICE OF THE ATTORNEY GENERAL  
STATE OF FLORIDA  
CONSUMER PROTECTION DIVISION

PL-01, The Capitol  
Tallahassee, FL 32399-1050

**ALTERNATIVELY**, this subpoena may be complied with by delivering copies of all of the requested materials, before the date set forth above to c/o Tallahassee Bureau Chief Assistant Attorney General Tracy P. Moye at [tracy.moye@myfloridalegal.com](mailto:tracy.moye@myfloridalegal.com), [rebecca.woolever@myfloridalegal.com](mailto:rebecca.woolever@myfloridalegal.com). The production of material in response to this demand shall include the following:

**SEE ATTACHED ADDENDUM**

**WITNESS**, the Department of Legal Affairs at Tallahassee, Florida, this 16<sup>th</sup> day of April, 2026.

JAMES UTHMEIER  
ATTORNEY GENERAL

*/s/ Tracy P. Moye*

Tracy P. Moye

FBN #782361

Tallahassee Bureau Chief

Michael Roland

FBN #44856

Tallahassee Assistant Bureau Chief

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**501.204 Unlawful acts and practices.—**

(1) Unfair methods of competition, unconscionable acts or practices, and unfair or deceptive acts or practices in the conduct of any trade or commerce are hereby declared unlawful.

(2) It is the intent of the Legislature that, in construing subsection (1), due consideration and great weight shall be given to the interpretations of the Federal Trade Commission and the federal courts relating to s. 5(a)(1) of the Federal Trade Commission Act, 15 U.S.C. s. 45(a)(1) as of July 1, 2017.

**501.206 Investigative powers of enforcing authority.—**

(1) If, by his or her own inquiry or as a result of complaints, the enforcing authority has reason to believe that a person has engaged in, or is engaging in, an act or practice that violates this part, he or she may administer oaths and affirmations, subpoena witnesses or matter, and collect evidence. Within 5 days, excluding weekends and legal holidays, after the service of a subpoena or at any time before the return date specified therein, whichever is longer, the party served may file in the circuit court in the county in which he or she resides or in which he or she transacts business and serve upon the enforcing authority a petition for an order modifying or setting aside the subpoena. The petitioner may raise any objection or privilege which would be available under this chapter or upon service of such subpoena in a civil action. The subpoena shall inform the party served of his or her rights under this subsection.

(2) If matter that the enforcing authority seeks to obtain by subpoena is located outside the state, the person subpoenaed may make it available to the enforcing authority or his or

her representative to examine the matter at the place where it is located. The enforcing authority may designate representatives, including officials of the state in which the matter is located, to inspect the matter on his or her behalf, and he or she may respond to similar requests from officials of other states.

(3) Upon failure of a person without lawful excuse to obey a subpoena and upon reasonable notice to all persons affected, the enforcing authority may apply to the circuit court for an order compelling compliance.

(4) The enforcing authority may request that an individual who refuses to comply with a subpoena on the ground that testimony or matter may incriminate him or her be ordered by the court to provide the testimony or matter. Except in a prosecution for perjury, an individual who complies with a court order to provide testimony or matter after asserting a privilege against self-incrimination to which he or she is entitled by law shall not have the testimony or matter so provided, or evidence derived therefrom, received against him or her in any criminal investigation or proceeding.

(5) Any person upon whom a subpoena is served pursuant to this section shall comply with the terms thereof unless otherwise provided by order of the court. Any person who fails to appear with the intent to avoid, evade, or prevent compliance in whole or in part with any investigation under this part or who removes from any place, conceals, withholds, mutilates, alters, or destroys, or by any other means falsifies any documentary material in the possession, custody, or control of any person subject to any such subpoena, or knowingly conceals any relevant information with the intent to avoid, evade, or prevent compliance shall be liable for a civil penalty of not more than \$5,000, reasonable attorney's fees, and costs.

## ADDENDUM

### Definitions

- A. “Company” or “companies” means the addressee/recipients of this subpoena, their parents, branches, departments, divisions, affiliates, subsidiaries, retail outlets, stores, franchises, successors, or predecessors, whether wholly owned or not, including, without limitation, any organization or entity in which said addressees have a management or controlling interest, together with all present and former officers, directors, agents, employees, sales people, brokers, representatives or anyone else acting or purporting to act, on behalf of the above-identified persons or entities, or through which The Environmental Law Institute, Inc., (ELI) and Climate Judiciary Project (CJP) may have conducted business. The term “you” and “your” shall be synonymous with The Environmental Law Institute, Inc., (ELI) and Climate Judiciary Project (CJP).
- B. “Document” or “documents” includes all paper records and all electronically stored information, including the original and any non-identical copy (whether different from the original because of notations on such copy or otherwise, and including all draft versions of the original), of any written, recorded, or graphic matter, however produced or reproduced, including, but not limited to, all correspondence, communications (as defined below in Paragraph E), web pages, social media communications, photographs, contracts (including drafts, proposals, and any and all exhibits thereto), drafts, minutes and agendas, memoranda (including inter and intra-office memoranda, memoranda for file, pencil jottings, diary entries, desk calendar entries, reported recollections, and any other written form of notation of events or intentions), transcripts and recordings of conversations and telephone calls, audio and video media files, books of account, ledgers, publications, professional journals, invoices, financial statements, purchase orders, receipts, canceled checks and all other paper or electronic documentary material of any nature whatsoever, together with any attachments thereto or enclosures therewith.
- C. The term “any” shall be construed as synonymous with “all” and shall be all inclusive.
- D. The connectives “and” and “or” shall be construed either disjunctively or conjunctively, whichever makes the request more inclusive.

- E. “Communication” or “communications” means any act, action, oral speech, written correspondence, contact, expression of words, thoughts, or ideas, or transmission or exchange of data or other information to another person, whether orally, person to person, in a group, by telephone, letter, personal delivery, intercom, fax, e-mail, text message, social media, or any other process, electric, electronic or otherwise in any medium. All such communications in writing shall include, without limitation, printed, typed, handwritten, emailed or other readable documents and any attachments or exhibits thereto.
- F. “Person” means any individual and all entities, and, without limiting the generality of the foregoing, includes natural persons, employees, contractors, agents, consultants, vendors, telemarketers, consumers, customers, officers, directors, successors, assigns, joint owners, associations, partnerships, companies, joint ventures, corporations, affiliates, trusts, trustees, escrow agents and estates, and all groups or associations of persons.
- G. “Related to” or “relating to” means in whole or in part constituting, containing, concerning, embodying, reflecting, discussing, describing, analyzing, identifying, stating, referring to, setting forth, dealing with, or in any way pertaining to.
- H. “Advertising” means any statement or representation disseminated in any manner or by any means for the purpose of inducing or which is reasonably likely to induce, directly or indirectly, a purchase or response.
- I. “CJP Advisory Curriculum Committee or Advisory Committee” means the committee of scientists, lawyers, and judges as referenced on the CJP website who contribute to the CJP Curriculum.
- J. “Attribution” means the process of evaluating the relative contributions of multiple causal factors to a change or event.
- K. “Collaborators” means “collaborators” as used by the Climate Judiciary Project on the Environmental Law Institute website.
- L. “CJP” means the Climate Judiciary Project as developed and implemented by the Environmental Law Institute.
- M. “Climate litigation” means any court proceeding relating to climate change, including, but not limited to, cases seeking to attribute climate change or any effects related to climate change to any party.

- N. “Direct or indirect funding” means any funding source, regardless of whether that source ultimately was routed through another organization (such as donor-advised fund) specifically including funding through direct contributions, scholarships, grants, and all educational programming.
- O. “Disclosure” means any oral or written communication intended to put a person on notice about a fact related to ELI or CJP, including, but not limited to, ELI’s or CJP’s funding sources, advisors, or goals.
- P. “ELI” means The Environmental Law Institute, Inc.
- Q. “Seminar” means any presentation provided to an audience that included any government employee or member of the public, including, but not limited to, conference sessions, webinars, programs, workshops, or follow-up communications related to such seminars in whatever form.

### **Instructions**

- R. This Subpoena is for the production of all responsive documents and information in your possession, custody or control regardless of whether such documents or information is possessed directly by you or your directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your attorneys or their agents, employees, representatives, or investigators.
- S. Unless otherwise specified, original documents must be produced, and the originals of electronic files must be produced in accordance with paragraph Z herein. If your “original” is a photocopy, then the photocopy would be and should be produced as the original. Said copy shall be legible and bound or stapled just like the original.
- T. The documents to be produced pursuant to each request should be segregated and specifically identified to indicate clearly the particular numbered request to which they are responsive.
- U. If any responsive document or information cannot be produced in full, you are to produce it to the extent possible, indicating which document, or portion of that document, is being withheld, and the reason that document is being withheld.
- V. If a document once existed and has subsequently been lost, destroyed, or is otherwise missing, please provide enough information to identify the document and state the details concerning its loss or destruction.

- W. Documents not otherwise responsive to this Subpoena shall be produced if such documents mention, discuss, refer to, or explain the documents that are called for by this Subpoena, or if such documents are attached to documents called for by this Subpoena and constitute routing slips, transmittal memoranda, or letters, comments, evaluations, or similar materials.
- X. If you do not possess, control, or have custody of any documents responsive to any numbered request set forth below, state this fact by so specifying in your response to said request.
- Y. The use of the singular form of a word includes the plural and vice versa. In addition, the use of any tense of any verb includes all other tenses of the verb.
- Z. ***Electronically Stored Information*** (ESI) is to be produced in the form in which it is ordinarily maintained. For example, native files would include email, spreadsheets and word processing files. Responsive documents that exist in electronic format shall be provided in native format (e.g., Microsoft Word files (.doc) or Outlook (.pst), emails, spreadsheets and word processing documents) with standard metadata intact, as outlined below. Before any production of responsive data from a structured database (e.g., Oracle, SAP, SQL, MySQL, QuickBooks, etc.), the producing party shall first provide the database dictionary and a list of all reports that can be generated from the structured database. The list of reports shall be provided in native Excel (.xls) format. The database format will be requested for production after both parties agree on the format. Please include sufficient identification of the applicable software program to permit access to, and use of, each document. All attachments must be linked to their electronic documents. Native files should be provided in directories which are identifiable as responsive to a specific document request. All documents produced in native form should be produced on CDROM, DVDROM, External USB, or other similar drive media of a type that can be read by any standard computer. Unless otherwise agreed to, standard metadata in electronically stored information shall be preserved and produced, such as: Custodian, To, From, CC, BCC, Dates and Times (Sent, Received and Modified), Attachments, Links and Document types. A more complete list can be provided upon request. Questions about electronic production should be directed to the Assistant Attorney General whose name appears on this Subpoena. Arrangements will be made for the communication with the appropriate in-house technical expert.
- AA. If you claim the attorney-client privilege, work-product privilege, or any other privilege, for any document, provide a detailed privilege log that contains at least the following information for each document that you have withheld:

- 1) The name of each author, writer, sender or initiator of such document or thing, if any;
- 2) The name of each recipient, addressee or party for whom such document or thing was intended, if any;
- 3) The date of such document, if any, or an estimate thereof so indicated if no date appears on the document;
- 4) The general subject-matter as described on such document; if no such description appears, then such other description sufficient to identify said document; and,
- 5) The claimed grounds for withholding the document, including, but not limited to, the nature of any claimed privilege and grounds in support thereof.

**BB. TRADE SECRET PROTECTION.** In the event you seek to assert trade secret protection under section 119.0715, Florida Statutes, or other applicable Florida Statutes, for each document for which trade secret protection is claimed:

- 1) Provide prior to, or simultaneous with, production of the document at issue, a sworn affidavit from a person with knowledge as to the basis for the trade secret claim, which complies with the following requirements:
  - a. The affidavit should specify the Bates range of the claimed trade secret documents at issue, generally describe the documents at issue, and provide evidence of the application of the trade secret exemption.
  - b. The affidavit should attach a certification (similar in form to a traditional privilege log) that identifies the following information for each separate claimed trade secret document: (i) the Bates range of the document; (ii) a description of the document sufficient to determine the application of the trade secret exemption; and (iii) the specific element(s) or provision(s) of section 688.002 that render the document at issue a trade secret exempted from public records.
- 2) Segregate and separately label the documents claimed as trade secrets as follows:
  - a. Documents produced electronically should be produced on separate CD or electronic media clearly labeled "Trade

Secret” on the physical media as well in the title of the electronic folder or file;

b. Documents produced in hard copy should be separated and each clearly labeled “Trade Secret.”

3) Any challenge to the application of the trade secret exemption shall be rebutted, if at all, only by you and not by the Office of the Attorney General, whose involvement shall be limited solely to providing notice to you of any challenge to your claim of trade secret protection. To the extent you seek to assert a trade secret exemption in connection with a public records request to the Office of the Attorney General, you shall be obligated to seek an appropriate protective order or otherwise establish the applicability of the trade secret claim and exemption. Failure to do so shall render the documents subject to production under any applicable public records requirements and not protected by a trade secret claim.

CC. All document destruction or retention policies and practices and electronic file deletion or disk management policies and practices (including, but not limited to, reformatting practices) that could have the effect of altering or deleting information requested by this Subpoena should be suspended.

1) Because electronically stored information is an important and irreplaceable source of evidence, you must take appropriate steps to preserve all potentially relevant documents within your control or practical ability to access, which includes, but is not limited to, preserving information from computer systems, removable or portable electronic media (like CDs/DVDs, USB drives), e-mail, text/instant messaging, “tweets” and other electronic correspondence at work and other locations, word processing documents, spreadsheets, databases, calendars, telephone logs, cell phones, voicemail, blogs, social media, internet usage files, website data, personal computers/laptops, personal data assistants (PDAs), servers, and archives/backup files, as well as other tangible documentation that will be relevant to the discovery of admissible evidence in this matter, so as to avoid any potential claims for spoliation of evidence. This request pertains not only to documents that are directly responsive to this Subpoena, but to all other documents that relate to the subject of our investigation as well.

2) Preservation of electronic data in its native format is essential, as a paper printout of text contained in a computer file does not completely reflect all information contained within an electronic file. Additionally, due to its format, electronic

evidence can be easily altered, deleted, corrupted or otherwise modified. Accordingly, you are required to take every reasonable step to preserve this information until the resolution of this matter. This includes, but is not limited to, the following obligations:

- a) Discontinue all data destruction and overwriting/recycling processes of relevant data;
  - b) Preserve passwords, decryption procedures (and accompanying software), access codes, ID codes, etc.; and
  - c) Maintain all pertinent information and tools needed to access, review and reconstruct all requested or potentially relevant electronic data.
- 3) Your obligations under the law are ongoing and should be considered in force and effect until the resolution of this matter. Accordingly, with regard to electronic data and documents that are created subsequent to the date of this Subpoena, relevant evidence is not to be destroyed or overwritten and you should take whatever steps are necessary to avoid destruction of potentially relevant evidence.

**WHEREFORE YOU ARE HEREBY COMMANDED TO PRODUCE:**

Unless otherwise noted, the time period applicable to the following requests is **March 20, 2020**, through the date on which the response to this Subpoena is due and/or actually provided to the Office of the Attorney General, whichever occurs later in time.

Unless otherwise specified, each request applies to both ELI and CJP separately. Accordingly, responsive documents for ELI **and** CJP should be produced for each request where both entities are identified.

1. Documents relating to all fundraising communications from ELI and from CJP to any person in Florida, including, but not limited to, any mail, email, or any phone scripts or directions used for telephone communications.
2. Documents relating to all direct and indirect private funding sources for ELI and for CJP, including, for each source of any funding, the amount of the funding, the direct and indirect source of the funding, and the date when the funding was provided.
3. Documents of all past or current agreements, contracts, and grants between ELI or CJP and any direct or indirect private funder of ELI or CJP, including, but not limited to, any requests for donations, donor directives, or restrictions related to agreements, contracts, grants, or other direct or indirect funding.
  - a. For each agreement, contract, and grant provide any communications between ELI or CJP and any direct or indirect private funder of ELI or CJP that were related to that agreement, contract, and grant.
4. Documents that reflect requests for donations, donor directives, agreements, or restrictions between ELI or CJP and any private funder of ELI or CJP.
5. Documents that reflect the dates and amounts of all instances in which ELI or CJP received direct or indirect private funding from an entity or individual that has or had directly or indirectly funded climate litigation.

6. Documents that reflect all funding received by ELI and by CJP, either directly or indirectly, from each of the following sources or their affiliates:
  - i. Barr Foundation
  - ii. Bloomberg Philanthropies
  - iii. ClimateWorks Foundation
  - iv. The Children’s Investment Fund Foundation
  - v. The Collective Action Fund
  - vi. The Energy Foundation
  - vii. Freedom Together Foundation
  - viii. Gates Foundation
  - ix. High Tide Foundation
  - x. The JPB Foundation
  - xi. MacArthur Foundation
  - xii. The Nathan Cummings Foundation, Inc.
  - xiii. New Venture Fund
  - xiv. The Oak Foundation
  - xv. Rockefeller Brothers Fund, Inc.
  - xvi. Rockefeller Family Fund, Inc.
  - xvii. The Rockefeller Foundation
  - xviii. Tides Foundation
  - xix. Wallace Global Fund
  - xx. The William & Flora Hewlett Foundation
  
7. Documents of all written communications between ELI or CJP, and each of the following entities relating to any climate litigation, including, but not limited to, all communications relating to the payment of any costs, fees, experts, consultants, advisors, or any other expenses arising from, or associated with, climate litigation by the following sources or their affiliates:
  - i. Barr Foundation
  - ii. Bloomberg Philanthropies
  - iii. ClimateWorks Foundation
  - iv. The Children’s Investment Fund Foundation
  - v. The Collective Action Fund
  - vi. The Energy Foundation

- vii. Freedom Together Foundation
- viii. Gates Foundation
- ix. High Tide Foundation
- x. The JPB Foundation
- xi. MacArthur Foundation
- xii. The Nathan Cummings Foundation, Inc.
- xiii. New Venture Fund
- xiv. The Oak Foundation
- xv. Rockefeller Brothers Fund, Inc.
- xvi. Rockefeller Family Fund, Inc.
- xvii. The Rockefeller Foundation
- xviii. Tides Foundation
- xix. Wallace Global Fund
- xx. The William & Flora Hewlett Foundation

8. Documents that identify all direct and indirect public funding sources for ELI and for CJP, including, but not limited to, state and federal agreements, contracts, and grants.
9. Copies of all agreements, contracts, and grants between ELI or CJP and any direct or indirect public funder of ELI or CJP, including, but not limited to, any donor requests, directives, or restrictions related to agreements, contracts, and grants or other direct or indirect funding.
  - a. For each agreement, contract, and grant, provide all communications between ELI or CJP and any direct or indirect public funder of ELI or CJP that were related to that agreement, contract, and grant.
10. Each agreement, contract, or grant which generated revenue for CJP.
11. Documents reflecting all receipts for dues paid to ELI or CJP by any judge in Florida or paid by any other entity or individual on behalf of any judge in Florida.

12. All subscription and publication receipts paid to ELI or CJP by any judge in Florida or paid by any other entity or individual on behalf of any judge, in Florida.
13. Documents for all payments to ELI or CJP by any judge in Florida or paid by any other entity or individual on behalf of any judge in Florida.
14. All documents, including expense records and receipts, paid by ELI, and those paid by CJP or any other entity or individual, for any judge in Florida to attend any ELI or CJP promoted conference or seminar.
15. All documents, including expense records and receipts, relating to any grant given by ELI or CJP for the promotion of any judicial conference or seminar.
16. A complete copy of the ELI and CJP website, including, but not limited to, all training materials, transcripts of all webinars and seminars, copies of all pamphlets and articles, and links on the ELI and CJP website.
17. All documents relating to every CJP conference, seminar, training, and event disseminated to any judge in Florida.
18. Documents that reflect all curricula for each past and current CJP seminar, and each past and current ELI conference, seminar, training, and event related to climate change.
19. Documents reflecting the date and location of all CJP conferences, seminars, trainings, and events attended by any judge in Florida.
20. Documents that reflect the attendance of a judge in Florida at any CJP conference, seminar, training, and event.
21. All communications between ELI and CJP and any judge in Florida relating to any CJP conference, seminar, training, and event.

22. All written disclosures made to participants in CJP seminars. Identify which disclosures were made in which seminars, and when each disclosure was made.
23. The curriculum vitae or resume of all past and present CJP advisors and contributors, including, but not limited to, all persons serving on a CJP Advisory Committee or a CJP Advisory Curriculum Committee.
24. All documents relating to the hiring process of current and former CJP personnel and faculty, including, but not limited to, applications, resumes, cover letters, and curriculum vitae for all personnel and faculty, including all persons serving as an CJP Advisor or serving on the CJP Advisory Curriculum Committee.
25. Documents to substantiate ELI's claim that CJP's advisors and collaborators are known for their impartiality.
26. All Communications and any related documents between any advisor, personnel, faculty, or contributor of ELI or CJP that relate to Ann Carlson or any law student in her legal clinic advising any attorney at Sher Edling regarding climate litigation.
27. All Communications and any related documents between any advisor, personnel, faculty, or contributor of ELI or CJP that relate to Michael Oppenheimer stating that Princeton should divest from oil and gas companies or that Exxon had engaged in "disinformation on climate change."
28. All Communications and any related documents between any advisor, personnel, faculty, or contributor of ELI or CJP that relate to Patrick Parenteau advising plaintiffs' climate litigation teams or stating that climate lawsuits "should" cause oil and gas companies to go bankrupt.
29. All documents of ELI and of CJP and of any advisor, personnel, faculty, or contributor of ELI or CJP relating to Jessica Wentz:

- a. submitting a public petition asking the Philippines to “hold the Carbon Majors accountable for the contribution to these impacts and request that other national governments do the same;”
  - b. authoring an article entitled the “Climate Attribution Science and The Endangered Species Act” published on 10-2021;
  - c. authoring an article entitled the “Liability for Public Deception: Linking Fossil Fuel Disinformation to Climate Damages” published on 12-2022;
  - d. submitting amicus briefs in support of climate change in cases including, but not limited to, *State of North Dakota v. U.S. EPA*, in the U.S. Court of Appeals for The District of Columbia Circuit.
30. All Communications between any advisor, personnel, faculty, or contributor of ELI and of CJP that relate to Gary Yohe signing a letter supporting Connecticut’s lawsuit against Exxon Mobil.
  31. All Communications between any advisor, personnel, faculty, or contributor of ELI and of CJP that relate to Robin Kundis Craig signing an amicus brief in the *Juliana v. United States* litigation which asserted a constitutional right against climate change.
  32. All Communications between any advisor, personnel, faculty, or contributor of ELI and of CJP that relate to John Dernback signing an amicus brief in the *Juliana v. United States* litigation which asserted a constitutional right against climate change.
  33. All Communications between any advisor, personnel, faculty, or contributor of ELI and of CJP that relate to Kristie Ebi signing an amicus brief in the *Juliana v. United States* litigation which asserted a constitutional right against climate change.
  34. All Communications between any advisor, personnel, faculty, or contributor of ELI and of CJP that relate to Jonathan Levy signing an amicus brief in the *Juliana v. United States* litigation which asserted a constitutional right against climate change.

35. All Communications between ELI or CJP and any plaintiffs' attorney(s) in past, current, or potential future climate litigation.
36. Documents of all Communications between ELI or CJP and attorneys for climate plaintiffs' Worthington & Caron LLP relating to any draft version of a CJP training module.
37. All Communications between ELI or CJP and any direct or indirect funders of any past, current, or potential climate litigation for any party.
38. All documents containing any disclosure relating to the funding sources of ELI or CJP.
39. All documents containing any disclosure relating to any statements or actions taken by any ELI or CJP advisor, personnel, faculty, or contributor.
40. All of ELI's responsive documents to the letter from the U.S. Senate Committee on Commerce, Science, and Transportation dated February 23, 2024, signed by Senator Ted Cruz.
41. All of ELI's responsive documents to any letters or demands from the U.S. House of Judiciary Committee.
42. All of ELI's responsive documents relating to the August 26, 2025, letter from Austin Knudsen Attorney General of Montana to the U.S. Environmental Protection Agency signed by twenty-three (23) State Attorneys General, including the Attorney General for the State of Florida, James Uthmeier.
43. All documents showing any monies paid to Jessica Wentz, Radley Horton, Columbia Law School or Columbia University for the authorship of the chapter entitled "Reference Guide on Climate Science" as originally published in the "Reference Manual on Scientific Evidence: Fourth Addition" by the Federal Judicial Center.

44. All documents showing any monies or grants paid by the National Academies of Sciences, Engineering, and Medicine to ELI or CJP.
45. All documents substantiating the CJP claim that “through its educational events, CJP has reached an estimated 2,000 judges” as reflected on the ELI website.
46. All documents provided to judges attending the CJP educational events referenced in requests number 49 and 50.
47. All documents showing any monies or grants paid by the U.N. Intergovernmental Panel on Climate Change (IPCC) to ELI or CJP.
48. All documents showing any monies or grants paid by the U.N. World Meteorological Organization (WMO) to ELI or CJP.
49. All documents identifying any judges in Florida who are enrolled in the CJP program for Judicial Leaders and Climate Science.
50. All documents provided by CJP to any judge in Florida identifying a legal scholar in the climate science community.
51. All transcripts of any conference, seminar, or training of ELI or CJP which reference “Aspirational Judging.”
52. The curriculum vitae of every individual who serves or has served on CJP’s Advisory Curriculum Committee.
53. As to every individual advisor and collaborator of CJP, including any individual serving on the CJP Advisory Curriculum Committee, all documents and pleadings wherein that individual’s expert opinion on climate science was challenged.
54. All documents produced to any other regulatory or investigatory body, committee, agency, or the like.

55. All documents regarding your “extensive consultation with practitioners and organizations on all sides of the political spectrum.”
56. All documents relating to “The Reluctant Judge” case study.