

EXHIBIT 19

UC BERKELEY POLICE DEPARTMENT

Call Number 08042165

Printed 08/27/2008 02:24 PM

Unit	Dept	DIS	ENR	ONS	LEF	ARR	BUS	REM	COM
31	UCPD		09:52:49. 2					10:04:12 .6	
35	UCPD		09:52:42. 3	09:52:38. 4	12:14:04. 5				14:24:18
43	UCPD		10:55:12. 6	11:05:32. 7	11:07:06. 1			12:13:38 .5	
73	UCPD		09:52:55. 3	10:04:19. 6				12:13:35 .7	
81	UCPD		09:52:52. 7	10:04:22. 2				12:13:33 .9	
S22	UCPD		09:52:46. 8	10:04:24. 3				12:13:31 .4	

Unit Log

Date-Time	Dept	Unit	Officer ID	Action	Comments
09:53:07	UCPD	73	73	Change Patrol	Patrol OTHER, 3124 SHATTUCK AVE, BRK

Category	Last Name	First Name	Middle Name	Suffix	Crim Hist	RMS Alerts			
Business Name	Description	Race	Sex	Ethni	Height	Weight	Age	DOB	OLN

Call Subject Statistics

Question	Answer
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**SILICON VALLEY
REGIONAL COMPUTER FORENSIC LABORATORY**

REQUEST FOR SERVICE

CASE INFORMATION (Please print legibly. If Not Applicable, enter "NA")		RCFL Case #
Is this the first request in this case? <input checked="" type="checkbox"/> First Request <input type="checkbox"/> Follow-up Request		Date:
Submitting Person: BILL KASISKE		Agency Case # 08-02544
Case Agent Name: BILL KASISKE		Suspect Name Or Case Title: ANIMAL RIGHTS
Case Agent Phone: 510-642-1606		Squad/Unit: INVESTIGATIONS
Case Agent Email: KASISKE@BERKELEY.EDU		Submitting Agency UC BERKELEY POLICE DEPT.
Case/Crime Type: STALKING		Task Force? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Prosecutorial Jurisdiction: <input checked="" type="checkbox"/> State <input type="checkbox"/> Federal <input type="checkbox"/> Military <input type="checkbox"/> Other		Task Force: <input type="checkbox"/> REACT <input type="checkbox"/> ICAC <input type="checkbox"/> JTTF <input type="checkbox"/> <input type="checkbox"/> Other (Specify):
Service or Seizure Location (Address): LONG HAUL INFOSHOP, 3124 SHATTUCK AVE, BERKELEY, CA		Classified Handling? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Date of Seizure: 08/21/08		Maximum Classification Level <input type="checkbox"/> Confidential <input type="checkbox"/> Secret <input type="checkbox"/> Top Secret <input type="checkbox"/> SCI
Suspect(s) in Custody? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes		Has a Prosecutor been assigned? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Narcotics Related? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes		Provide Prosecutor's Name & Phone Number:
Special Master Case? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes		Trial Prep? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Were any RCFL personnel consulted in preparation of the Search Warrant? <input checked="" type="checkbox"/> No or NA		Pending Court Dates? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
List Operating Systems of all computers, if known. <input type="checkbox"/> Windows <input type="checkbox"/> Apple/Macintosh <input type="checkbox"/> Unix/Linux <input checked="" type="checkbox"/> Unknown <input type="checkbox"/> Other		PPA Privilege? e.g. prelim. trial):
Any of the following items submitted/anticipated? <input checked="" type="checkbox"/> None <input type="checkbox"/> Unknown <input type="checkbox"/> Palm/PDA <input type="checkbox"/> Cell Phone <input type="checkbox"/> Other		Search Warrant <input checked="" type="checkbox"/> Consent <input type="checkbox"/> Probation <input type="checkbox"/> Parole <input type="checkbox"/> Grand Jury <input type="checkbox"/> Adversely <input type="checkbox"/> Other
Has this evidence been viewed, examined or otherwise accessed by anyone prior to submission to the RCFL? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes		Privileged Information? <input type="checkbox"/> No <input type="checkbox"/> Yes NOT SURE
Field Service Information		Special Handling? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Date Service Requested:	Estimated Number of Computers:	This includes any material specified under the Privacy Protection Act. For example any material intended for publication such as books, articles or computer programs
		If any additional "Special Handling" procedures are required please describe below or attach additional pages
All requests for Field Services should be submitted at least two business days prior to requested date of service		

Service Requested

Describe in detail what examinations are needed and what type of data you expect to be present. If there are special handling requirements, please describe. Attach additional pages as needed. If you have any reports, statements or other documentation which may assist in the examination, please attach to this request.

SEE ATTACHED

RCFL USE ONLY	Date Received:	Case Priority:	Examiner Assigned:
	Received By:	Established By:	

Rev. Erik Harris 12-22-2004

EXHIBIT 20

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11 Attorneys for Defendants
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WILLIAM KASISKE, WADE MACADAM and
12 TIMOTHY J. ZUNIGA
13

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16

17 LONG HAUL, INC., and EAST BAY
PRISONER SUPPORT,

18 Plaintiffs,
19

20 v.

21 UNITED STATES OF AMERICA;
MITCHELL CELAYA; KAREN
ALBERTS; WILLIAM KASISKE; WADE
22 MACADAM; TIMOTHY J. ZUNIGA;
MIKE HART; LISA SHAFFER; AND
23 DOES 1-25,

24 Defendants.

Case No. 3:09-cv-0168 JSW

**DEFENDANT WILLIAM KASISKE'S
RESPONSES TO PLAINTIFFS'
REQUESTS FOR ADMISSION**

25 PROPOUNDING PARTY: Plaintiffs LONG HAUL, INC. and EAST BAY PRISONER
26 SUPPORT

27 RESPONDING PARTY: Defendant WILLIAM KASISKE

28 SET NUMBER: ONE

1 Subject to and without waiving the foregoing general and specific objections,
2 Kasiske responds as follows: Denied.

3 **REQUEST FOR ADMISSION NO. 34:**

4 Admit that the search warrant purported to authorize a search for unspecified
5 "evidence".

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

7 Kasiske objects to this request on the grounds that it is vague and ambiguous as
8 to the terms and phrase "purported," "authorize," and "unspecified 'evidence.'" Kasiske
9 further objects to this request to the extent that it assumes facts not in evidence.
10 Kasiske further objects to this request on the ground that it seeks information equally
11 available to the requesting party. Kasiske further objects to this request to the extent
12 that it calls for a legal conclusion. Kasiske further objects to this request to the extent
13 that it seeks information protected from disclosure by the attorney-client privilege and/or
14 the attorney work-product doctrine.

15 Subject to and without waiving the foregoing general and specific objections,
16 Kasiske responds as follows: Denied.

17 **REQUEST FOR ADMISSION NO. 35:**

18 Admit that defendants or their agents made copies of Plaintiffs' data following the
19 raid.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

21 Kasiske objects to this request on the grounds that it is vague and ambiguous as
22 the term "Defendants" and understands that term to refer specifically to defendants
23 Mitchell Celaya, Karen Alberts, William Kasiske, Wade MacAdam and Timothy J. Zuniga
24 (collectively, "University Defendants"). Kasiske further objects to this request on the
25 grounds that it is vague and ambiguous as to the terms "agents," "copies," and "data."
26 Kasiske further objects to this request to the extent that it assumes facts not in evidence.
27 Kasiske further objects to this request to the extent that it calls for a legal conclusion.
28 Kasiske further objects to this request on the ground that it is compound. Kasiske further

1 objects to this request on the ground that it is overbroad and unduly burdensome.
2 Kasiske further objects to this request on the ground that it is argumentative, prejudicial,
3 and misleading as to the use of the term "raid." Kasiske further objects to this request to
4 the extent it seeks information protected from disclosure by the attorney-client privilege
5 and/or the attorney work-product doctrine.

6 Subject to and without waiving the foregoing general and specific objections,
7 Kasiske responds as follows: Kasiske admits that the University of California Berkeley
8 Police Department made copies of the hard drives and a flashdrive that were seized
9 from the Long Haul premises.

10 **REQUEST FOR ADMISSION NO. 36:**

11 Admit that defendants or their agents have retained copies of Plaintiffs' data taken
12 during the raid.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

14 Kasiske objects to this request on the grounds that it is vague and ambiguous as
15 the term "Defendants" and understands that term to refer specifically to defendants
16 Mitchell Celaya, Karen Alberts, William Kasiske, Wade MacAdam and Timothy J. Zuniga
17 (collectively, "University Defendants"). Kasiske further objects to this request on the
18 grounds that it is vague and ambiguous as to the terms "agents," "retained," "copies,"
19 "data, and "taken." Kasiske further objects to this request to the extent that it assumes
20 facts not in evidence. Kasiske further objects to this request to the extent that it calls for
21 a legal conclusion. Kasiske further objects to this request on the ground that it is
22 compound. Kasiske further objects to this request on the ground that it is overbroad and
23 unduly burdensome. Kasiske further objects to this request on the ground that it is
24 argumentative, prejudicial, and misleading as to the use of the term "raid." Kasiske
25 further objects to this request to the extent it seeks information protected from disclosure
26 by the attorney-client privilege and/or the attorney work-product doctrine.

27 Subject to and without waiving the foregoing general and specific objections,
28 Kasiske responds as follows: Kasiske admits that the University of California Berkeley

EXHIBIT 21

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LONG HAUL, INC., and EAST)
BAY PRISONER SUPPORT,)
)
Plaintiffs,)
)
vs.) No. C 09-00168-JSW
)
UNITED STATES OF AMERICA;)
MIGUEL CELAYA; KAREN)
ALBERTS; WILLIAM KASISKE;)
WADE MacADAM; TIMOTHY)
ZUNIGA; MIKE HART; LISA)
SHAFFER,)
)
Defendants.)
_____)

30(b)(6) DEPOSITION OF

CHRIS BEESON

Held at the Law Offices of SchiffHardin
One Market Street, San Francisco, California
Wednesday, December 1, 2010, 10:06 a.m.

REPORTED BY: ELAINA BULDA-JONES, RPR, CSR #11720

1 Q. What function does the -- the Lab serve?

2 A. We process computer forensic evidence for
3 law enforcement in the Bay Area.

4 Q. And what do you mean by the term
10:18 5 "process"?

6 A. We conduct examinations of digital
7 evidence.

8 Q. What is the relationship between the Lab
9 and the FBI?

10:19 10 MR. LEE: Objection. Vague.

11 "Relationship." The notice said "affiliation".

12 Can you try to clarify what it is you are
13 asking.

14 BY MR. ZIMMERMAN:

10:19 15 Q. Is the Lab an arm of the FBI?

16 MR. LEE: Same objections.

17 THE WITNESS: The Lab is affiliated with

18 the FBI in that the FBI funds -- is its primary

19 funding source, and we generally follow FBI

10:19 20 principles and protocols as they relate to computer
21 forensic material.

22 BY MR. ZIMMERMAN:

23 Q. What do you mean by generally follow FBI
24 protocols in that respect?

10:19 25 A. The FBI --

1 MR. LEE: I will just object. It's
2 irrelevant.

3 THE WITNESS: The FBI provides the
4 foundation for the processes with which we would
10:20 5 use, provides the training for our people.

6 BY MR. ZIMMERMAN:

7 Q. Are employees at the Lab employed by the
8 FBI?

9 A. Not all of them.

10:20 10 Q. So some employees at the Lab are employed
11 by the FBI?

12 A. Yes.

13 Q. Step back a little bit, try to get a
14 slightly bigger picture. Who -- who is -- who
10:20 15 staffs the Lab? Let's start with how many people
16 are staffed at the Lab?

17 A. Today?

18 Q. As of right now.

19 A. We have six FBI forensic examiners that
10:21 20 are full time. We have an administrative specialist
21 who is employed by the FBI. I am employed by the
22 FBI. And we currently have eight law enforcement
23 officers from different police departments around
24 the area. And if you like, I can list them out for
10:21 25 you.

EXHIBIT 22

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WILLIAM KASISKE, WADE MACADAM and
12 TIMOTHY J. ZUNIGA

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14 UNITED STATES DISTRICT COURT
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17 LONG HAUL, INC., and EAST BAY
PRISONER SUPPORT,

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20 UNITED STATES OF AMERICA;
21 MITCHELL CELAYA; KAREN
ALBERTS; WILLIAM KASISKE; WADE
22 MACADAM; TIMOTHY J. ZUNIGA;
MIKE HART; LISA SHAFFER; AND
23 DOES 1-25,

24 Defendants.
25
26
27
28

Case No. 3:09-cv-0168 JSW

**DEFENDANT WADE MACADAM'S
RESPONSE TO PLAINTIFFS' FIRST SET
OF INTERROGATORIES**

1 ambiguous as the term "you," and understands that term to refer specifically and solely
2 to Defendant Wade MacAdam. MacAdam further objects to this interrogatory to the
3 extent it seeks information protected from disclosure by the attorney-client privilege and
4 the attorney work-product doctrine. MacAdam further objects to this interrogatory on the
5 ground and to the extent it assumes facts that are not in evidence.

6 Subject to and without waiving the foregoing general and specific objections,
7 MacAdam responds as follows:

8 MacAdam responds that he was not aware that EBPS publishes a newsletter until
9 after the filing and service of this lawsuit.

10 **INTERROGATORY NO. 13:**

11 Identify all facts relating to or regarding when you first ascertained that Slingshot
12 publishes a newspaper.

13 **RESPONSE TO INTERROGATORY NO. 13:**

14 MacAdam objects to this interrogatory on the grounds that it is vague and
15 ambiguous as the term "you," and understands that term to refer specifically and solely
16 to Defendant Wade MacAdam. MacAdam further objects to this interrogatory to the
17 extent it seeks information protected from disclosure by the attorney-client privilege and
18 the attorney work-product doctrine. MacAdam further objects to this interrogatory on the
19 ground and to the extent it assumes facts that are not in evidence.

20 Subject to and without waiving the foregoing general and specific objections,
21 MacAdam responds as follows:

22 MacAdam responds that he was aware prior to the execution of the search
23 warrant that Slingshot was the name of a publication. He was not aware whether
24 Slingshot published a newspaper. He was not aware of the organization which
25 published "Slingshot." MacAdam further responds that he was not aware that Slingshot
26 publishes a newspaper until after the filing and service of this lawsuit.

27 **INTERROGATORY NO. 14:**

28 Identify all facts that support, contradict, or relate to your contention that you had

EXHIBIT 23

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11 Attorneys for Defendants
MITCHELL CELAYA, KAREN ALBERTS,
WILLIAM KASISKE, WADE MACADAM and
12 TIMOTHY J. ZUNIGA
13

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16

17 LONG HAUL, INC., and EAST BAY
PRISONER SUPPORT,

18 Plaintiffs,
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20 v.

21 UNITED STATES OF AMERICA;
MITCHELL CELAYA; KAREN
ALBERTS; WILLIAM KASISKE; WADE
22 MACADAM; TIMOTHY J. ZUNIGA;
MIKE HART; LISA SHAFFER; AND
23 DOES 1-25,

24 Defendants.
25
26
27
28

Case No. 3:09-cv-0168 JSW

**DEFENDANT KAREN ALBERTS'
RESPONSE TO PLAINTIFFS' FIRST SET
OF INTERROGATORIES**

1 UC-Berkeley faculty member's home and was monitored entering the Long Haul
2 premises after the home demonstration.

3 **INTERROGATORY NO. 8:**

4 Identify all items, including photographs, originally located in the Slingshot office
5 that each member of the raid team, including you, observed or handled in connection
6 with or after the raid.

7 **RESPONSE TO INTERROGATORY NO. 8:**

8 Alberts objects to this interrogatory on the grounds that it is vague and ambiguous
9 as the term "you," and understands that term to refer specifically and solely to Defendant
10 Karen Alberts. Alberts further objects to this interrogatory on the grounds that it is vague
11 and ambiguous as to the terms "handled" and "items." Alberts further objects to this
12 interrogatory on the grounds that it is vague, ambiguous, and overbroad as to plaintiffs'
13 definition of "raid team." Alberts further objects to this interrogatory as plaintiffs'
14 definition of "Slingshot office" assumes facts not in evidence. Alberts further objects to
15 this interrogatory to the extent it is overbroad and unduly burdensome. Alberts further
16 objects to this interrogatory to the extent it seeks information protected from disclosure
17 by the attorney-client privilege and the attorney work-product doctrine Alberts further
18 objects to this interrogatory on the ground and to the extent it assumes facts that are not
19 in evidence. Alberts further objects to this interrogatory to the extent it is argumentative,
20 prejudicial, and misleading as to the use of the term "raid."

21 Subject to and without waiving the foregoing general and specific objections,
22 Alberts responds as follows:

23 Alberts responds that she was not aware of a "Slingshot office" at any time during
24 the execution of the search warrant. She further responds she did not handle any items,
25 including photographs, taken from the upstairs office or "Slingshot office" in connection
26 with or after the execution of the search warrant. Alberts further responds that she
27 observed Slingshot publications in the upstairs office or "Slingshot office" during the
28 execution of the search warrant. Alberts further responds that she is aware that Zuniga

1 handled photographs located in the upstairs office or Slingshot office during the
2 execution of the search warrant but is not aware of what other members of the search
3 warrant team observed or handled from the "Slingshot office" either in connection with or
4 after the execution of the search warrant.

5 **INTERROGATORY NO. 9:**

6 Identify all dates on which you visited or examined the Long Haul premises before
7 the date of the raid and the reason for each such visit or examination.

8 **RESPONSE TO INTERROGATORY NO. 9:**

9 Alberts objects to this interrogatory on the grounds that it is vague and ambiguous
10 as the term "you," and understands that term to refer specifically and solely to Defendant
11 Karen Alberts. Alberts further objects to this interrogatory on the grounds that it is vague
12 and ambiguous as to the terms "visited," "visit," "examined," and "examination." Alberts
13 further objects to this interrogatory to the extent it is overbroad and unduly burdensome.
14 Alberts further objects to this interrogatory to the extent that it seeks information that is
15 neither relevant nor reasonably calculated to lead to the discovery of admissible
16 evidence. Alberts further objects to this interrogatory on the ground that it is compound.
17 Alberts further objects to this interrogatory to the extent it is argumentative, prejudicial,
18 and misleading as to the use of the term "raid."

19 Subject to and without waiving the foregoing general and specific objections,
20 Alberts responds as follows:

21 Alberts responds that she did not visit or examine the Long Haul premises before
22 August 27, 2008. Alberts further responds that as part of a criminal investigation, she
23 did surveillance on the Long Haul premises during a fundraiser by the animal rights
24 group, StopCalVivisection. Alberts did not enter the Long Haul premises, but rather,
25 observed the individuals enter the Long Haul premises to attend the fundraiser. Alberts
26 further responds that as part of a criminal investigation, she followed an individual,
27 known to be an animal rights activist, after a demonstration at a UC-Berkeley faculty
28 member's home and that individual went to the Long Haul premises. Alberts did not

1 enter the Long Haul premises, but rather, observed the individual enter the Long Haul
2 premises after the home demonstration.

3 **INTERROGATORY NO. 10:**

4 Identify all information that you had in your possession regarding Long Haul,
5 EBPS, Slingshot, and the Long Haul premises prior to the raid and how you came into
6 possession of that information.

7 **RESPONSE TO INTERROGATORY NO. 10:**

8 Alberts objects to this interrogatory on the grounds that it is vague and ambiguous
9 as the terms "you" and "your," and understands that term to refer specifically and solely
10 to Defendant Karen Alberts. Alberts further objects to this interrogatory on the grounds
11 that it is vague and ambiguous as to the term "possession." Alberts further objects to
12 this interrogatory to the extent it is overbroad and unduly burdensome. Alberts further
13 objects to this interrogatory to the extent that it seeks information that is neither relevant
14 nor reasonably calculated to lead to the discovery of admissible evidence. Alberts
15 further objects to this interrogatory on the ground that it is compound. Alberts further
16 objects to this interrogatory to the extent it is argumentative, prejudicial, and misleading
17 as to the use of the term "raid."

18 Subject to and without waiving the foregoing general and specific objections,
19 Alberts responds as follows:

20 Alberts responds that she had no information in her possession regarding EBPS.

21 Alberts further responds that she was aware that Slingshot was a publication and
22 that it published articles written by or about activism, anarchists, and animal rights
23 activists. She gained this knowledge through her work at UCBPD.

24 Alberts further responds that she was aware that the Long Haul premises was
25 used by groups or organizations to hold meetings, discussions, fundraising and
26 recreational activities. Alberts was aware that the threatening emails sent to a number of
27 UC-Berkeley faculty members originated from an IP address originating from the Long
28 Haul premises. Alberts further learned that it was unknown which individual or