

EXHIBIT 24

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Attorneys for Defendants
11 MITCHELL CEYELA, 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,
19

20 v.

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

24 Defendants.
25
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Case No. 3:09-cv-0168 JSW

**DEFENDANT TIMOTHY J. ZUNIGA'S
RESPONSE TO PLAINTIFFS' FIRST SET
OF INTERROGATORIES**

1 objects to this interrogatory to the extent it seeks information equally available to the
2 requesting party.

3 Subject to and without waiving the foregoing general and specific objections,
4 Zuniga responds as follows:

5 Zuniga responds that he did not prepare or assist in the preparation of the search
6 warrant or the Statement of Probable Cause in support of the search warrant. Further,
7 Zuniga responds that he was unaware at the time of the execution of the search warrant
8 that EBPS and Slingshot were located at the Long Haul premises.

9 Zuniga further responds that there was reason to believe that a person associated
10 with Long Haul may have been primarily responsible or given assistance to the individual
11 or individuals responsible for sending the threatening and harassing emails which were
12 the subject of the search warrant because threatening emails had been sent to UC-
13 Berkeley faculty by someone using the computers located at the Long Haul premises
14 and it was unknown which individual or individuals were sending the threatening emails
15 or which computers in particular had been used to send the threatening emails.
16 Moreover, at least one animal rights group had used the Long Haul premises for a
17 fundraising event, prior to the execution of the search warrant and during the time period
18 when the investigation into the threatening emails was ongoing. Finally, an animal rights
19 activist had been seen leaving a home demonstration at a UC-Berkeley faculty
20 member's home and was monitored entering the Long Haul premises after the home
21 demonstration.

22 **INTERROGATORY NO. 8:**

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

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

27 Zuniga objects to this interrogatory on the grounds that it is vague and ambiguous
28 as the term "you," and understands that term to refer specifically and solely to Defendant

1 Timothy Zuniga. Zuniga further objects to this interrogatory on the grounds that it is
2 vague and ambiguous as to the terms "handled" and "items." Zuniga further objects to
3 this interrogatory on the grounds that it is vague, ambiguous, and overbroad as to
4 plaintiffs' definition of "raid team." Zuniga further objects to this interrogatory as plaintiffs'
5 definition of "Slingshot office" assumes facts not in evidence. Zuniga further objects to
6 this interrogatory to the extent it is overbroad and unduly burdensome. Zuniga further
7 objects to this interrogatory to the extent it seeks information protected from disclosure
8 by the attorney-client privilege and the attorney work-product doctrine Zuniga further
9 objects to this interrogatory on the ground and to the extent it assumes facts that are not
10 in evidence. Zuniga further objects to this interrogatory to the extent it is argumentative,
11 prejudicial, and misleading as to the use of the term "raid."

12 Subject to and without waiving the foregoing general and specific objections,
13 Zuniga responds as follows:

14 Zuniga responds that he was not aware of a "Slingshot office" at any time during
15 the execution of the search warrant. He further responds he searched the upstairs office
16 or "Slingshot office" for items listed in the search warrant, including reviewing
17 photographs, in connection with or after the execution of the search warrant. He further
18 responds that he did not find anything responsive to the search warrant during his review
19 of items in the upstairs office or "Slingshot office." Zuniga further responds that he is not
20 aware of what other members of the search warrant team observed or handled from the
21 "Slingshot office" either in connection with or after the execution of the search warrant.

22 **INTERROGATORY NO. 9:**

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

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

26 Zuniga objects to this interrogatory on the grounds that it is vague and ambiguous
27 as the term "you," and understands that term to refer specifically and solely to Defendant
28 Timothy Zuniga. Zuniga further objects to this interrogatory on the grounds that it is

EXHIBIT 25

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LONG HAUL, INC. and EAST BAY)	
PRISONER SUPPORT,)	
)	
Plaintiffs,)	
)	
v.)	No. C 09-00168-JSW
)	
UNITED STATES OF AMERICA; MIGUEL)	
CELAYA; KAREN ALBERTS; WILLIAM)	
KASISKE; WADE MacADAM; TIMOTHY)	
ZUNIGA; MIKE HART; LISA SHAFFER;)	
and DOES 1 - 25,)	
)	
Defendants.)	
)	

DEPOSITION OF WILLIAM SASISKE, taken on behalf
of Plaintiffs, at One Market Street, 32nd Floor, San
Francisco, California, commencing at 9:04 a.m.,
Tuesday, July 27, 2010, before Donna J. Blum,
Certified Shorthand Reporter, No. 11133.

From: Bill Kasiske <kasiske@berkeley.edu>
Sent: Friday, August 29, 2008 12:31 PM
To: kalberts@berkeley.edu
Subject: Long Haul computer forensics
Attach: long haul computer search.doc

Here is the document I am providing to the lab to assist in searching the computers from the Long Haul.

Det. Bill Kasiske #35
UC Berkeley Police Department
1 Sproul Hall
Berkeley, CA 94720-1199
Main ph: 510-642-6760
Dir ph: 510-642-1606
Fax: 510-642-1708



UC 000381

Animal rights stalking case, computer data**Background**

For the past year, animal rights activists have been targeting multiple UC Berkeley professors and graduate students who conduct research using animals. Their harassment has consisted of demonstrations and vandalism and their homes, threatening/harassing phone calls, and threatening/harassing email messages. There have been recent arson attacks against researchers at UCLA and UC Santa Cruz. Activists from the Santa Cruz area have been known to participate in demonstrations against UC Berkeley researchers.

Our investigation determined that a suspect was sending threatening email messages from an establishment called the Long Haul Infoshop in Berkeley. On 08/26/08, UCPD obtained a search warrant to seize computers from the Long Haul Infoshop. On 08/27/08, we seized fourteen computers, two external hard drives, a USB flash drive, and several miscellaneous CDs and diskettes. In an effort to prioritize the seized evidence, we have identified six computers as being the most likely computers the suspect would have used. These six computers were located in an area labeled as the "internet room." They were attached to accessories such as monitors, keyboards, and mice. They were also connected to phone/DSL cables, presumably so they could connect to the internet. There were five computers in this room that were not connected to anything and did not appear to be in regular use. The remaining three computers were seized from office areas that seemed more likely to belong to individual groups, rather than available for public use. We would initially like to search the primary six computers for the following:

Evidence pertaining to the threatening email messages

Since the identity of the sender is unknown, we are hoping to find anything that could help identify this person. It would be helpful to determine which computer(s) the suspect used to send the messages and any information about what else the suspect did with the computer around the time the messages were sent (ie – websites visited, documents created, other email messages sent, etc.).

The suspect has used the following email addresses: [REDACTED]jisscum@gmail.com, [REDACTED]08@yahoo.com, [REDACTED]33@yahoo.com, [REDACTED]01@yahoo.com, [REDACTED]11@yahoo.com, [REDACTED]444@gmail.com, sciencerculz09@yahoo.com, linuxlove9@yahoo.com, animal.killers@yahoo.com, fuk [REDACTED]@gmail.com, [REDACTED]kills@gmail.com, [REDACTED]kills001@gmail.com.

Copies of the email messages are attached for reference.

Evidence pertaining to arson, vandalism, or other harassment targeting researchers

In addition to seeking evidence pertaining to email threats, we are hoping to discover whether or not these computers were used to communicate or otherwise document anything regarding arson attacks, vandalisms, and other harassment that has been perpetrated against University of California researchers. The keywords listed in the following section could help to locate this type of evidence.

EXHIBIT 26

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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

Plaintiffs,)

v.)

No. C 09-00168-JSW

UNITED STATES OF AMERICA; MIGUEL)
CELAYA; KAREN ALBERTS; WILLIAM)
KASISKE; WADE MacADAM; TIMOTHY)
ZUNIGA; MIKE HART; LISA SHAFFER;)
and DOES 1 - 25,)

Defendants.)
_____)

DEPOSITION OF TIMOTHY ZUNIGA, taken on behalf
of Plaintiffs, at One Market Street, 32nd Floor, San
Francisco, California, commencing at 12:58 p.m.,
Wednesday, July 28, 2010, before Donna J. Blum,
Certified Shorthand Reporter, No. 11133.

From: tzuniga@berkeley.edu
Sent: Tuesday, February 19, 2008 12:21 PM
To: kalberts@berkeley.edu
Subject: Re: [Fwd: Activist Website Article - Berkeley/LA Connection]

>Sarg,
> On their home page they claim an affiliation with The Long Haul on
>3124 Shattuck Ave here in Berkeley. They have a "Radical contact
>list" on their site (<http://slingshot.tao.ca/rcelist.php>)
>
>I made a list of locations here in Berkeley, Oakland, San Francisco and
>Santa Cruz in case we need this for reference in future or current
>investigations. I put it in the N drive under AREWG/Subjects and
>Victims/Slingshot Radical Contact list.
>
>Please contact me with any questions. Thank you.

Corporal Timothy J. Zuniga
Crime Prevention Unit
UC Berkeley Police Department
1 Sproul Hall
Berkeley, Ca 94720
Phone 510-642-3722
Fax 510-642-6434

This e-mail communication and any attachments may contain confidential and privileged, or otherwise protected, information for the use of the designated recipients named above only. If you are not the intended recipient, you are hereby notified that you have received this communication in error and that any review, disclosure, dissemination, distribution or copying of it or its contents is prohibited and unauthorized. If you have received this communication in error, please notify me immediately by replying to this message and deleting it from your computer. Thank You.

> FYI!
>
> Karen
>
> ----- Original Message -----
> Subject: Activist Website Article - Berkeley/LA Connection
> From: "Richard C. Van Sluyters" <rcvs@berkeley.edu>
> Date: Tue, February 19, 2008 11:30 am
> To: Animal Issues Committee;;
> Cc: Animal Issues Committee-copies;;
> -----

>
> Dear Colleagues,
>
> John Sandbrook at UCLA discovered this website, which seems to be
> authored by one of our animal activists or someone very close to
> them. It contains a number of interesting statements, including a
> comparison of the campaign against research at UC Berkeley to that
> against UCLA. *If any of us had any doubts about whether the two*
> campaigns are not at least watching each other, this should dispel
> them.
>
> I've forwarded it to UCPD, OGC and the FBI as well.
>
> -Rick



> --
> Richard C. Van Sluyters, OD, PhD
> Professor and Associate Dean for Student Affairs,
> School of Optometry
> Chair, Animal Care and Use Committee
> University of California
> Berkeley, CA 94720-2020
>
> Associate Dean's Office: (510) 642-9537
> ACUC Office: (510) 642-8855
> Personal: (510) 642-1235
> Facsimile: (510) 642-2281
>
> --
> Sergeant Karen Alberts
> UC Berkeley Police Department
> Criminal Investigations Bureau
> 1 Sproul Hall
> Berkeley, CA 94720
> (510) 642-6760 (24 hr. number)
> (510) 642-0482 (Voice Mail)
> (510) 642-6434 (Fax)
>

EXHIBIT 27

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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

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No. C 09-00168-JSW

UNITED STATES OF AMERICA; MIGUEL)
CELAYA; KAREN ALBERTS; WILLIAM)
KASISKE; WADE MacADAM; TIMOTHY)
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and DOES 1 - 25,)

Defendants.)

_____)

DEPOSITION OF TIMOTHY ZUNIGA, taken on behalf
of Plaintiffs, at One Market Street, 32nd Floor, San
Francisco, California, commencing at 12:58 p.m.,
Wednesday, July 28, 2010, before Donna J. Blum,
Certified Shorthand Reporter, No. 11133.

SLINGSHO

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TO
FIGHT
BACK!

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EXHIBIT 108
2/28/10 I
ZUNIGA
PENGAD 800-631-6899