

EXHIBIT C

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11 Attorneys for Plaintiffs
12 LONG HAUL, INC. AND EAST BAY
PRISONER SUPPORT

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

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

Case No. 3:09-cv-0168 JSW

18 Plaintiffs,

**PLAINTIFF LONG HAUL'S RESPONSES
AND OBJECTIONS TO FIRST SET OF
REQUESTS FOR ADMISSION BY
DEFENDANT UNITED STATES**

19 v.

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

23
24 Defendants.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 8**

2 Plaintiff objects to this Request for Admission as vague and ambiguous. Subject to this
3 objection, Plaintiff answers as follows: To the extent that this Request for Admission asks about
4 written communications received by the UC Berkeley Police Department not authored by
5 Plaintiff, Plaintiff cannot truthfully admit or deny this request for admission because Plaintiff
6 does not have sufficient information or knowledge to do so. To the extent that this Request for
7 Admission asks about written communications received by the UC Berkeley Police Department
8 authored or co-authored by Plaintiff, Plaintiff answers as follows: denied. The first written
9 correspondence from Plaintiffs' current counsel to the UC Berkeley Police Department in which
10 the UC Berkeley Police Department was informed of the fact that Long Haul published Slingshot
11 was sent on October 22, 2008.

12 **REQUEST FOR ADMISSION NO. 9**

13
14 Admit that the first written correspondence to the UC Berkeley Police Department
15 informing them of the fact that EBPS provided information to the public was sent on or after
16 October 27, 2008.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 9**

18 Plaintiff objects to this Request for Admission as vague and ambiguous. Subject to this
19 objection, Plaintiff answers as follows: To the extent that this Request for Admission asks about
20 written communications received by the UC Berkeley Police Department not authored by
21 Plaintiff, Plaintiff cannot truthfully admit or deny this Request for Admission because Plaintiff
22 does not have sufficient information or knowledge to do so. To the extent that this Request for
23 Admission asks about written communications received by the UC Berkeley Police Department
24 authored or co-authored by Plaintiff, Plaintiff answers as follows: admitted.

25 **REQUEST FOR ADMISSION NO. 10**

26
27 Admit that on September 18, 2008, Defendant Kasiske had a conversation with Seth
28 Chazin wherein Defendant Kasiske stated that he would be able to release some of the property

1 seized during the August 28, 2008 search.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 10**

3
4 Admitted.

5 **REQUEST FOR ADMISSION NO. 11**

6 Admit that on September 19, 2008, Detective Reich released property numbered E35-1, E
7 35-2, E 35-3, E35-4, E35-5, E35-11, E35-12, and E35-13 to Chloe Watlington.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 11**

9
10 Admitted.

11 **REQUEST FOR ADMISSION NO. 12**

12 Admit that on September 19, 2008, Chloe Watlington signed both pages of the property
13 receipt, which were produced in this litigation and BATES numbered UC000297-000298.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 12**

15
16 Admitted.

17 **REQUEST FOR ADMISSION NO. 13**

18 Admit that on September 23, 2008, Defendant Kasiske had a conversation with Seth
19 Chazin wherein Defendant Kasiske stated that he would be able to release additional property
20 seized during the August 28, 2008 search.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 13**

22
23 Admitted.

24 **REQUEST FOR ADMISSION NO. 14**

25 Admit that on September 30, 2008, Kasiske released property numbered E35-6, E 35-7, E
26 355-8, E35-9, E35-10, E35-14, E35-15, E35-16, E 35-17, and E35-18 to Christopher Henning.

1 up by the Bay Area Animal Rights Network.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 21**

3
4 Plaintiff cannot truthfully admit or deny this Request for Admission because Plaintiff
5 does not have sufficient information or knowledge to do so. Plaintiff admits that an email
6 message apparently announcing the event appears to have been sent through the Bay Area
7 Animal Rights Network listserv.

8 **REQUEST FOR ADMISSION NO. 22**

9
10 Admit that the organization "Stop UCB Vivisection" was dedicated to stopping the
11 practice of vivisection and animal experimentation at UC Berkeley.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 22**

13 Plaintiff cannot truthfully admit or deny this request for admission because Plaintiff does
14 not have sufficient information or knowledge to do so. Plaintiff admits that the organization
15 stated that this was its goal.

16 **REQUEST FOR ADMISSION NO. 23**

17
18 Admit that Long Haul provided Stop Cal Vivisection with a grant in 2008.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 23**

20 Admitted.

21 **REQUEST FOR ADMISSION NO. 24**

22
23 Admit that Long Haul gave Stop Cal Vivisection at least \$50 in 2008.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 24**

25 Plaintiff objects to this Request for Admission as vague and ambiguous. Subject to this
26 objection, Plaintiff answers as follows: admitted that Long Haul gave Stop Cal Vivisection
27 exactly \$50 in 2008.

1 **REQUEST FOR ADMISSION NO. 25**

2 Admit that Peter Young spoke at Long Haul in January 2008.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 25**

4
5 Admitted.

6 **REQUEST FOR ADMISSION NO. 26**

7 Admit that Peter Young gave a presentation at Long Haul in January of 2008.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 26**

9
10 Admitted.

11 **REQUEST FOR ADMISSION NO. 27**

12 Admit that Peter Young is an animal activist.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 27**

14
15 Plaintiff objects to this request on the ground that it is ambiguous as to the term “animal
16 activist.” Plaintiff admits that Peter Young has indicated that he opposes fur farms.

17 **REQUEST FOR ADMISSION NO. 28**

18 Admit that there was a showing of “Behind the Mask” at Long Haul in January of 2008.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 28**

20
21 Admitted.

22 **REQUEST FOR ADMISSION NO. 29**

23
24 Admit that on January 27, 2008 Detective Zuniga observed an individual enter the Long
25 Haul premises after demonstrating at home of UC Berkeley personnel.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 29**

27 Plaintiff cannot truthfully admit or deny this request for admission because Plaintiff does
28

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 36**

2 Plaintiff cannot truthfully admit or deny this request for admission because Plaintiff does
3 not have sufficient information or knowledge to do so.

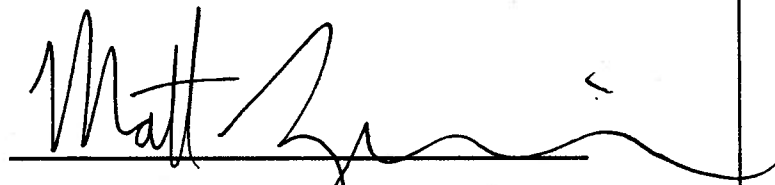
4 **REQUEST FOR ADMISSION NO. 37**

5
6 Admit that the Silicon Valley Regional Computer Forensics Laboratory has not
7 performed any search on any computers seized from the East Bay Prisoner Support Office during
8 the search.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 37**

10 Plaintiff cannot truthfully admit or deny this request for admission because Plaintiff does
11 not have sufficient information or knowledge to do so.

12
13
14 DATED: October 12, 2010



15
16 ELECTRONIC FRONTIER FOUNDATION
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COUNSEL FOR PLAINTIFFS

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27 Plaintiffs,

28 v.

PROOF OF SERVICE

29 UNITED STATES OF AMERICA;
30 MITCHELL CELAYA; KAREN ALBERTS;
31 WILLIAM KASISKE; WADE MACADAM;
32 TIMOTHY J. ZUNIGA; MIKE HART; LISA
33 SHAFFER; AND DOES 1-25,

34 Defendants.

SDK
cc: WJC
- LBG
- BRK

(pos only)

1 I, Leticia Perez, declare:

2 I am employed in the City and County of San Francisco, California by Electronic Frontier
3 Foundation at 454 Shotwell Street, San Francisco, California 94110. I am over the age of eighteen
4 years and am not a party to the within cause.

5 On October 15, 2010, at the above-referenced address, I served the attached

- 6 • PLAINTIFF LONG HAUL'S RESPONSES AND OBJECTIONS TO
7 SECOND SET OF REQUEST FOR PRODUCTION OF DOCUMENTS BY
8 DEFENDANT UNITED STATES OF AMERICA
- 9 • PLAINTIFF EAST BAY PRISONER SUPPORT'S RESPONSES AND
10 OBJECTIONS TO SECOND SET OF REQUEST FOR PRODUCTION OF
11 DOCUMENTS BY DEFENDANT UNITED STATES OF AMERICA
- 12 • PLAINTIFF EAST BAY PRISONER SUPPORT'S RESPONSES AND
13 OBJECTIONS TO FIRST SET OF REQUEST FOR ADMISSION BY
14 DEFENDANT UNITED STATES
- 15 • PLAINTIFF LONG HAUL'S RESPONSES AND OBJECTIONS TO FIRST
16 SET OF REQUEST FOR ADMISSION BY DEFENDANT UNITED STATES
- 17 • PLAINTIFF LONG HAUL'S RESPONSES AND OBJECTIONS TO FIRST
18 SET OF INTERROGATORIES BY DEFENDANT UNITED STATES OF
19 AMERICA
- 20 • PLAINTIFF EAST BAY PRISONER SUPPORT'S RESPONSES AND
21 OBJECTIONS TO FIRST SET OF INTERROGATORIES BY DEFENDANT
22 UNITED STATES OF AMERICA
- 23 • PLAINTIFF LONG HAUL'S RESPONSES AND OBJECTIONS TO FIRST
24 SET OF REQUEST FOR PRODUCTION OF DOCUMENTS BY
25 DEFENDANT MIKE HART
- 26 • PLAINTIFF EAST BAY PRISONER SUPPORT'S RESPONSES AND
27 OBJECTIONS TO FIRST SET OF REQUEST FOR PRODUCTION OF
28 DOCUMENTS BY DEFENDANT MIKE HART
- PLAINTIFF EAST BAY PRISONER SUPPORT'S RESPONSES AND
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DOCUMENTS BY DEFENDANT MIKE HART
- PLAINTIFF LONG HAUL'S RESPONSES AND OBJECTIONS TO FIRST
SET OF REQUEST FOR ADMISSION BY DEFENDANT MIKE HART
- PLAINTIFF EAST BAY PRISONER SUPPORT'S RESPONSES AND
OBJECTIONS TO FIRST SET OF REQUEST FOR ADMISSION BY
DEFENDANT MIKE HART
- PLAINTIFF LONG HAUL'S RESPONSES AND OBJECTIONS TO FIRST
SET OF INTERROGATORIES BY DEFENDANT MIKE HART
- PLAINTIFF EAST BAY PRISONER SUPPORTS RESPONSES AND
OBJECTIONS TO FIRST SET OF INTERROGATORIES BY DEFENDANT
MIKE HART
- PLAINTIFF LONG HAUL'S RESPONSES AND OBJECTIONS TO FIRST
SET OF REQUEST FOR PRODUCTION OF DOCUMENTS BY
DEFENDANT LISA SHAFFER
- PLAINTIFF EAST BAY PRISONER SUPPORT'S RESPONSES AND

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OBJECTIONS TO SECOND SET OF REQUEST FOR PRODUCTION OF DOCUMENTS BY DEFENDANT LISA SHAFFER

- PLAINTIFF EAST BAY PRISONER SUPPORT’S RESPONSES AND OBJECTIONS TO FIRST SET OF REQUEST FOR ADMISSION BY DEFENDANT LISA SHAFFER
- PLAINTIFF LONG HAUL’S RESPONSES AND OBJECTIONS TO FIRST SET OF REQUEST FOR ADMISSION BY DEFENDANT LISA SHAFFER
- PLAINTIFF EAST BAY PRISONER SUPPORT’S RESPONSES AND OBJECTIONS TO FIRST SET OF INTERROGATORIES BY DEFENDANT LISA SHAFFER
- PLAINTIFF LONG HAUL’S RESPONSES AND OBJECTIONS TO FIRST SET OF INTERROGATORIES BY DEFENDANT LISA SHAFFER

on the interested parties in said cause by

personal delivery by messenger service of the document(s) above to the person(s) at the address(es) set forth below:

X placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in accordance with the firm’s practice of collection and processing correspondence with the United States Postal Service, which in the normal course of business provides for the deposit of all correspondence and documents with the United States Postal Service on the same day they are collected and processed for mailing to the person(s) at the address(es) set forth below:

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Jonathan Unruth Lee
 UNITED STATES ATTORNEYS
 OFFICE
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Attorney for Defendants: Lisa Shaffer,
 Mike Hart, United States of America

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
 DATED: October 15, 2010


 LETICIA PEREZ