

From: [Chad Mahalich](#)
To: [Ryan Wagner](#); [Scott Alonso](#); [Jason Peck](#); [Chris Walpole](#)
Subject: FW: Discovery
Date: Tuesday, June 29, 2021 8:49:00 AM

Please see point #4 (Ryan & Scott). Chris asked that I forward this email to you, to determine how our office plans to deal with this type of request. Please let me know what our position is.

Chad Mahalich

From: Linda Fullerton <lindafullertonlaw@sbcglobal.net>
Sent: Saturday, June 26, 2021 4:10 PM
To: Chad Mahalich <CMahalich@contracostada.org>; Chris Weir <chrisweir@aol.com>; Todd Bequette <bequettelw@aol.com>
Subject: Discovery

Hello Chad:

There are various phone data records we still do not have.

1) Det. Nelly Morris issued a warrant signed on Oct. 25, 2018 that request among other things, the names and telephone numbers of stored contacts on Clark's phone, text messages, social media, emails, photographs etc. From this request, all we have received are text messages from June 30, 2018 @ 6:40:48 through July 1 @ 12:54:27. Please provide the rest of that download

2) Regarding the records that Analyst Medal has - I am assuming he is working from the records on disc 16. In Sears Statement of Probable Cause on the warrant signed Sept. 5th 2019 she comments that Medal, using new technology, was able to extract additional information from Clark's phone and that information has not been viewed by law enforcement. It is that further information that Medal extracted that we still need.

3) The results from the U.S. Secret Services lab report is not complete. We have the two pages. What we do not have is the electronic copies of the Cellebrite Report and the original and forensic copies of the image files. Those are listed under Items Provided on page two of the two page report. This information was given to Deputy Vu.

4) I understand that the Vera Institute produced a report for your office where they did a compilation and analyses of charging data from your office. I will need that for the Racial Justice Act motion that I am going to file.

Thank you, and let me know if you need any clarification on what I am requesting.

Linda