

## IMSI-CATCHER SAMPLE DISCOVERY REQUEST

Pursuant to RELEVANT RULE/STATUTE, Defendant JOHN DOE requests the following discovery concerning electronic devices capable of identifying the location of a cellular telephone. These devices, known as an International Mobile Subscriber Identity (“IMSI”) catcher or cell site simulator, are operated under brand names including, but not limited to “Stingray,” “Triggerfish,” “Kingfish” and “DRTbox.”

JOHN DOE believes an IMSI catcher or cell site simulator (collectively “device(s)”) was used in this case and seeks discovery of the following records about such device(s), regardless of its name or label:

1. Details concerning the device(s), whether in written form or not, including:
  - a. the manufacturer and brand of the device(s) and any additional equipment used in connection with the device(s);
  - b. the capabilities of the device(s);
  - c. descriptions of the information captured by the device(s) and whether and how it is retained;
2. Physical access to any and all devices used in this case by any federal, state or local law enforcement official;
3. Copies of the raw data produced by the device(s) and utilized by law enforcement;
4. For all law enforcement agencies and officers involved in this case, copies of any and all
  - a. arrest reports from any officers who used any device during this case, regardless of whether the device(s) is specifically referenced in the report or not;
  - b. logs, sign out sheets or other records documenting who used the device(s) and the circumstances on its deployment;

- c. training or certification records of the officers that used the device(s);
- d. training materials in the possession of law enforcement agencies for the device(s);
- e. contracts, memorandums of understanding and agreements, including but not limited to nondisclosure agreements, concerning the device in the possession of, or that bind the law enforcement agencies;
- f. internal policies, guidelines, training manuals, or presentations concerning use or disclosure of the devices;
- g. administrative or grand jury subpoenas, pen registers, search warrants and any other judicial order, including the application, affidavit and orders, applied for, whether granted or not, by law enforcement in this case concerning
  - i. Customer(s) CLIENT/CO-DEFENDANT NAME;
  - ii. Phone number XXX-XXX-XXXX AND ANY OTHER RELEVANT NUMBERS;
  - iii. Cell phone provider VERIZON/SPRINT/ETC.
- h. records produced as a result of the orders described above used;