

US v Thomas Costanzo

Ex. 3 to Response to Motion in Limine on Discovery (dkt. # 144)

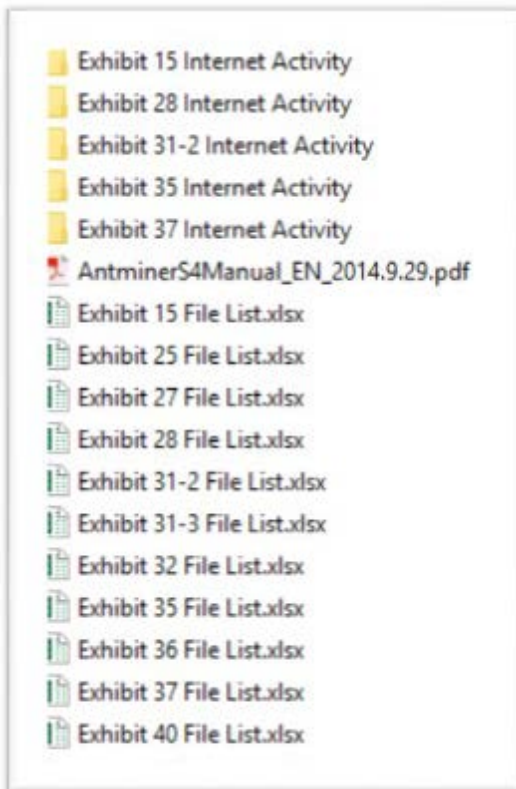
From: [Binford, Matthew \(USAAZ\)](#)
To: ["Linda Ondrovic"](#)
Cc: ["Maria Weidner"](#); [Zachary Cain](#); [Restaino, Gary \(USAAZ\)](#); [Escalante Konti, Fernanda \(USAAZ\)](#)
Subject: RE: Recent disclosures
Date: Friday, March 09, 2018 3:47:00 PM

Linda,

It was nice chatting with you.

As I mentioned on the phone, we do not have PDF extraction reports generated for the entire content of each device. Although the ".ufdr" files will have the entire contents of each device (searchable with the associated UFED.exe program included in the discovery), we have no PDF or other reports with all of the content for each device. The reports that were sent to Maria on February 27th (i.e. "Kuro Bubble DMT Report," "Mad Steve Report," etc.) were limited reports of the evidence we intend to use at trial, as detailed in Gary Restaino's February 27th letter about the electronic evidence.

We are burning a disc right now with the folder labeled "004208 Supplemental Files." When you open that folder, the contents should look like this:



Please let me know if you have any other questions, or if I can help with anything else.

Have a great weekend,

Matt

AUSA Matt Binford
District of Arizona
(602) [REDACTED]

From: Binford, Matthew (USAAZ)
Sent: Friday, March 09, 2018 2:45 PM
To: Linda Ondrovic <[REDACTED]@fd.org>
Subject: RE: Recent disclosures

Hi Linda,

I just left a message on your voicemail. Please let me know when you have second.

Thanks,

Matt

From: Binford, Matthew (USAAZ)
Sent: Friday, March 09, 2018 10:04 AM
To: Linda Ondrovic <[REDACTED]@fd.org>
Subject: Re: Recent disclosures

Linda,

I'm in a meeting right now. I'll call you as soon as I am done.

Thanks,

Matt

On Mar 9, 2018, at 9:22 AM, Linda Ondrovic <[REDACTED]@fd.org> wrote:

Good morning, Mr. Binford:

Apologies. I had an appointment this morning, but am in now. You can reach me directly at (602) [REDACTED].

Thank you,
Linda

Linda J. Ondrovic | Paralegal
Federal Public Defender

850 W. Adams Street | Phoenix, AZ 85007

T: [REDACTED] | F. [REDACTED]

linda_ondrovic@fd.org

“Unless someone like you cares a whole awful lot, nothing is going to get better. It’s not.” ~ Dr. Seuss

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<graycol.gif>"Binford, Matthew (USAAZ)" ---03/09/2018 08:02:49 AM---Linda, Let me know once you are in today and have time to talk this through, and if there is a certa

From: "Binford, Matthew (USAAZ)" <[REDACTED]>
To: Linda Ondrovic <[REDACTED]>
Cc: Maria Weidner <[REDACTED]>
Date: 03/09/2018 08:02 AM
Subject: RE: Recent disclosures

Linda,

Let me know once you are in today and have time to talk this through, and if there is a certain number that I should call.

Thanks,

Matt

From: Binford, Matthew (USAAZ)
Sent: Thursday, March 08, 2018 5:56 PM
To: 'Maria Weidner' <[REDACTED]>
Cc: Linda Ondrovic <[REDACTED]>
Subject: RE: Recent disclosures

I will call and talk to Linda tomorrow. Thanks. Have a good evening and a safe drive tomorrow.

Matt

From: Maria Weidner <[REDACTED]>
Sent: Thursday, March 08, 2018 5:53 PM
To: Binford, Matthew (USAAZ) <[REDACTED]>
Cc: Linda Ondrovic <[REDACTED]>
Subject: RE: Recent disclosures

I don't have access right now, call the office tomorrow and ask to speak to our paralegal,

Linda Ondrovic, She has handling the discovery (and has the hard drive). And I have to go to Florence tomorrow anyway. Thanks--Maria

Maria Teresa Weidner, AFPD
District of Arizona
850 West Adams Street, Ste. 201
Phoenix, Arizona 85007-2730
p: [REDACTED] f: [REDACTED]

<graycol.gif>"Binford, Matthew (USAAZ)" ---03/08/2018 05:50:59 PM---Maria, Let me know if you're still in the office and want me to call you (I tried the main number bu

From: "Binford, Matthew (USAAZ)" <[REDACTED]>
To: Maria Weidner <[REDACTED]>
Cc: Linda Ondrovic <[REDACTED]>, "Restaino, Gary (USAAZ)" <[REDACTED]>, "Escalante Konti, Fernanda (USAAZ)" <[REDACTED]>
Date: 03/08/2018 05:50 PM
Subject: RE: Recent disclosures

Maria,

Let me know if you're still in the office and want me to call you (I tried the main number but got the message that the office is closed). Otherwise, let's chat tomorrow and I'll try to get this sorted out for you to make sure you have everything.

Thanks,

Matt

From: Maria Weidner <[REDACTED]>
Sent: Thursday, March 08, 2018 5:26 PM
To: Restaino, Gary (USAAZ) <[REDACTED]>; Binford, Matthew (USAAZ) <[REDACTED]>; Escalante Konti, Fernanda (USAAZ) <[REDACTED]>
Cc: Linda Ondrovic <[REDACTED]>
Subject: Recent disclosures

Two questions:

- 1) please disclose Bates 4218, we can't seem to find it/may not have received it, and
- 2) It does not appear we received a complete cellbrite extraction report on the harddrive...lookks like we only got the extraction reports for the evidence you wish to use...are we missing something?

many thanks--Maria

Maria Teresa Weidner, AFPD

District of Arizona
850 West Adams Street, Ste. 201
Phoenix, Arizona 85007-2730

p: [REDACTED] f: [REDACTED]