Cellebrite Reader Request Language

Request For Cellebrite Data. Upon a defendant's request, the government must permit a defendant to inspect and to copy or photograph the results or reports of any physical or mental examination and of any scientific test or experiment if:

(i) the item is within the government's possession, custody, or control;

(ii) the attorney for the government knows--or through due diligence could know--that the item exists; and

(iii) the item is material to preparing the defense or the government intends to use the item in its case-in-chief at trial.

Fed.R.Crim.Pro. 16(F).

It is counsel's understanding that government agents used a forensic tool called Cellebrite UFED to extract data from a digital device. Generally, there are three types of extractions that can be performed: logical, file system, and physical. Once data has been extracted, the government has several options on how to produce the data to the defense. When data is extracted from a digital device, the data can be stored in several formats depending on the type of device and type of extraction. After many extractions, Cellebrite saves a report of the data in .html (the "original .html version"). Additionally, a file is created with .ufd or .ufdx extensions. Moreover, depending on the extraction type, other data may be stored in .bin; ZIP/TAR extensions. As for the .ufd and .ufdx file formats, Cellebrite allows license holders to send a free reader which allows others to view the files in original file format (the .UFDR file format).

Accordingly, pursuant to Fed.R.Crim.Pro. 16(F), Mr. XXXX moves this Court to order the government to produce the following for each extraction completed on each digital device:

(1)   The original .html version of the report;
(2)   The UFED Reader;
(3)   The UFDR report; and
(4)   All data captured as a result of the extraction (*e.g.,* .bin files; ZIP/TAR files; etc.).