

[REDACTED]

[REDACTED]

Plaintiff,

vs

[REDACTED]

[REDACTED]

Defendant.

[REDACTED]


MOTION FOR AN EARLY RETURN OF DISCOVERY

[REDACTED] through his attorney [REDACTED]

[REDACTED] moves this Court to order an early return of a subpoena to Parabon Nanolabs for the

following items:

1. The complete “GEDCOM” file associated with this case;
 - a. The electronic data file, in whatever format, generated from the evidence sample in this case, that was uploaded to any genetic genealogy database. Please provide the original raw data file generated by Parabon labs, either SNP or WGS, any data file that was/has been processed through a bioinformatics program, and the data file that came from the original raw data that was uploaded to any genetic genealogy database

- b. The quality control manuals or procedures for the first generation of the original data file from the SNP/WGS testing
 - c. Any and all data quality documentation from the data file generated by the SNP/WGS testing including but not limited to the call rate, need for imputation, mixture analysis, the presence of bacterial or other non-human DNA sequences
2. A list of all DNA testing kits, a list of all programs used in the processing of the data including but not limited to bioinformatics systems.
3. All bench notes (laboratory file) including but not limited to the chain of custody of the samples received and processed in this case, the testing of the samples using SNP/WGS technology, any and all notes regarding the use of bioinformatics on the data file, any and all notes by the individual who conducted the genetic genealogy search of any database including the information in the databases relied upon, the source materials including but not limited to the documentation such as birth, death and marriage records, newspaper clipping, any notes of the individual relating to conclusions of relationships drawn by the analyst.
4. The names and addresses of all persons identified as a potential “match” or “distant match” with the “subject” profile in the “Snapshot Genetic Genealogy Report.”

5. All versions of any validation studies or summaries about Parabon’s “Snapshot Genetic Genealogy Report” or any other system including bioinformatics systems used on the data in this case;
6. All versions of Parabon’s “Snapshot Phenotype Prediction Validation Summary”;
7. Parabon’s standard operating procedures (SOPs), policies, and protocols that apply to either the DNA testing done (SNP/WGS) and the genetic genealogy searches and/or analysis using Family Tree DNA and/or any public (e.g., GEDmatch) or commercial (e.g., AncestryDNA) genealogy databases;
8. Parabon’s SOPs, policies, and protocols that apply to genetic genealogy research and/or analysis;
9. Parabon’s SOPs and/or policies or protocols that apply to the creation and/or use of “GEDCOM” files, “Parabon Snapshot Phenotype Report(s)”, and/or “Parabon Snapshot Genetic Genealogy Report(s)”;
10. Any records regarding the use of other genealogy services in this case apart from Family Tree DNA (e.g., GEDmatch, 23andMe, etc.);
11. Any communications between Parabon and law enforcement;
12. Any communications between Parabon and Family Tree DNA.